



Woolf Bond Planning
Chartered Town Planning Consultants

APPEAL BY FOREMAN HOMES LTD.

LAND SOUTH OF ROMSEY AVENUE, FAREHAM

**OUTLINE PLANNING APPLICATION FOR 225 DWELLINGS, BIRD CONSERVATION AREA AND
AREA OF PUBLIC OPEN SPACE WITH ALL MATTERS RESERVED EXCEPT FOR ACCESS
LPA REF: P/18/1073/FP**

REASONS FOR REQUESTING AN INQUIRY

In accordance with the provisions laid down in Annexe K of the Planning Inspectorate's Procedural Guidance for Appeals (March 2021), an Inquiry will be the most appropriate procedure in this instance because the Council's reasons for refusal will require expert evidence (Annexe O) from professional witnesses and the case is likely to be heard over 5-6 days.

The submitted evidence will need to be tested by the Inspector for the following reasons:

- The issues which need to be assessed in the determination of the appeal are complex and evidence will need to be presented by professional witnesses, particularly in dealing with matters relating to:
 - (i) The extent and materiality of the shortfall in the five year housing land supply position having regard to the overall planning balance
 - (ii) The landscape impact of the Appeal Scheme given the location of the site adjacent to but outside the defined settlement boundary.
 - (iii) The impact of the Appeal Scheme upon European sites and the need for a Habitats Regulations Assessment.
 - (iv) The acceptability of on-site ecological mitigation.
 - (v) The impact of the Appeal Scheme in relation to highway impact and safety.
 - (vi) The suitability of the approach to and strategy for surface water drainage.
 - (vii) The judgment taken in carrying out the overall planning balance.

- The Appellant and the Council are expected to call 6 witnesses in order deal with the aforementioned issues at (i) to (vii) above. There is also significant local resident interest. As such, it is envisaged that the appeal is likely to require 5-6 days in order for the evidence to be considered in full.
- Material facts and matters of opinion are in dispute (including in relation to the application of the NPPF), such that cross examination of witnesses is required; and
- Legal submissions are required to be made in relation to the application of the NPPF, including in the context of case law concerning s38(6) and compliance with the development plan when taken as a whole.

19th March 2021
