

The Planning Inspectorate
Registry/Scanning Team
3/01 Kite Wing
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

30 August 2024
EP ref: 24-401

Dear Sir or Madam

Re: Town and Country Planning Act 1990 (as amended)
Appeal by Bloor Homes NW Ltd
Site: Land East of Froghall Road, Cheadle

Emery Planning is instructed by Morris Homes NW Ltd to submit an appeal against the refusal of Staffordshire Moorlands District Council to grant planning permission reference SMD/2021/0610 for "Outline application for residential development with access considered (all other matters reserved)". The decision was issued on 15 April 2024.

The following documents are submitted via the Appeals Casework Portal:

- Completed planning appeal form;
- Statement of Case;
- Draft Statement of Common Ground
- Appeal document list; and
- Planning application documents (as listed in document list).

In accordance with Annex K of the Planning Inspectorate's Procedural Guide for Planning Appeals in England (December 2022), we request that the appeal proceed by way of an Inquiry, which we anticipate will last for 4 days (dependent on Third Party involvement). We consider that an Inquiry is necessary because:

- The application proposals relate to major development.
- The appellant wishes to be represented by an advocate.

- The issues are complex and include technical matters relating to the impact of the proposals on designated heritage assets, landscape impacts and housing land supply. Addressing these matters will involve large amounts of technical evidence and cross examination. The issues cannot be properly tested and interrogated through Written Representations or a Hearing.
- There is a difference of approach between the Appellant, and the Council in relation to the interpretation and application of policies contained in the Local Plan and the National Planning Policy Framework, particularly in relation to those spatial policies relating to the delivery of housing within the borough.
- There are clear differences between parties on a range of complex issues arising from policy fact and expert opinion, which will need to be tested by way of cross examination.
- There was a significant level of local interest in the application, with the application attracting a total of 194 comments, including 185 objections. A large number of third parties may wish to speak / be represented at the Inquiry. Conducting a Hearing with such a number of parties would not be workable.

For the reasons stated above, an inquiry is considered the most (and only) appropriate method for determining the appeal. There is no basis for the appeal to be determined by way of any other procedure and to do so would seriously prejudice the Appellant's case and would risk an unnecessary and costly adjournment.

We estimate that the case will take 4 days to be heard.

We confirm that the local planning authority have been informed of this appeal and provided copies of the relevant appeal documentation.

Please mark any future correspondence to our office regarding this appeal to John Coxon noting our job reference: 24-401:JC.

Should you have any queries please do not hesitate to contact us.

Yours sincerely
Emery Planning

John Coxon

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Director

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