

Appeal Ref: 6002485
Council Ref: 3/2025/0196

Outline planning application for up to 300 residential dwellings, associated access, rail station car park, green infrastructure and sustainable drainage systems (all matters reserved except for access) at Land south of Longsight Road, Langho

Case Management Conference to be held at 10:00 on Monday 23 February 2026 via Microsoft Teams

INSPECTOR'S PRE-CONFERENCE NOTE

Introduction

1. The case management conference (CMC) will be led by me, Gareth Jones MRTPI, as the Inspector appointed to conduct the associated Inquiry.
2. In addition to this Note, you should also receive instructions for joining the CMC, a note on the etiquette to be observed, and the CMC agenda.
3. Please read this Note carefully – it is set out in detail to help you prepare so that time at the CMC can be focussed on the most important matters.
4. The procedure at the Inquiry will generally follow the Town and Country Planning Appeals (Determination by Inspectors) (Inquiries Procedure) (England) Rules 2000.
5. The following links will take you to additional helpful information for good practice in presenting evidence in appeals:
[Resources | Planning and Environmental Bar Association](#)
[Planning Inspectorate webinars - GOV.UK](#)
6. I have opted to produce this Note a little earlier than I would have liked as I am on leave next week and the CMC will take place early the following week. Ideally, I would have preferred to have waited for the Council's Statement of Case to have been submitted and there to have been a completed, or at least more advanced draft, Statement of Common Ground (SoCG). Nonetheless, any matters arising can be picked up during the CMC.

Participants at the CMC

7. If you have not already done so, please provide the PINS case officer, Stephen Skeates, with a CMC attendance list by email as soon as possible. During the CMC I shall normally only expect to hear from one representative for each party, usually whoever shall perform the role of advocate at the Inquiry.

Purpose of the CMC

8. The appeal has been submitted on the basis that the Council refused to grant planning permission for the proposal. The description of development above is taken from the application form. The appeal is scheduled to be considered at an Inquiry.
9. The Inquiry will focus on areas where there is disagreement. It is essential that all parties work effectively with one another henceforth to narrow the issues for consideration at the Inquiry.
10. The purpose of the CMC is to consider the ongoing management of the case and arrangements for the Inquiry, so that the appeal is dealt with in an efficient and effective manner. There will be no discussion of the merits of the case at the CMC.
11. Nonetheless, I would like to discuss the likely main issues and what the evidence should cover, along with any other matters for discussion.
12. Inquiries tend to run most efficiently when concerns have been ironed out at the earliest opportunity. To this end, you are encouraged to contribute to the CMC. Participants are reminded that advice in respect of awards of costs in planning appeals includes that all parties are expected to behave reasonably to support an efficient and timely process, for example in providing all the required evidence in accordance with identified deadlines.

Housekeeping

Dates and times

13. The Inquiry is scheduled to open at 10.00am on Tuesday 28 April 2026, sitting for up to seven days: the four days to Friday 1 May and then on 6-8 May (the following Wednesday to Friday). During the CMC I would like to discuss whether seven days is likely to be sufficient. At this stage, I think that it will be.
14. While the Inquiry is running, in general, I will aim to finish each day at around 5.00pm. After the first day, it will normally resume at 9.30am. A lunch break of up to an hour shall be taken at around 1.00pm, with shorter breaks of some 15 minutes to be taken mid-morning and mid-afternoon.

Venue

15. I would like to discuss any potential venues for the Inquiry, during the CMC. If these are known now, I would be grateful if the details were to be communicated by the Council to Mr Skeates as soon as possible, please.
16. The venue shall be accessible, include suitable retiring rooms for me and each of the four main parties, provide Wi-Fi access, microphone/PA system and, if needed, facilities to livestream or record the event. I shall also need to be provided with a convenient car parking space at the venue.
17. Consideration may need to be given to providing a document/maps table in the inquiry room.

18. Experience indicates that it is best if responsibility for these matters is not left purely to the Council's professional witness/es for the Inquiry.
19. I will need to be advised of details of when and how I can access the building and security arrangements.
20. The following links provide additional advice for setting up a venue for a public inquiry and advice for hosting events:
[Setting up a venue for a public inquiry, hearing or examination - GOV.UK](#)
[Guidance for Local Planning Authorities and others hosting virtual events for the Planning Inspectorate - GOV.UK](#)
21. The Council shall also confirm at the CMC if notification of the appeal has taken place as required.

Main Issues

22. Based on the reasons for refusal, having regard to the wider information currently before me, the main issues are likely to be [respective reasons for refusal in box brackets]:
 - Whether the proposed development would conflict with the Council's strategy for the location of new housing [1];
 - The proposed development's effect on the character and appearance of the area [1 & 3];
 - Its effect on sustainable modes and patterns of transport [2];
 - Its effects on biodiversity, including in terms of Biodiversity Net Gain [4 & 5]; and
 - Whether any harm that might result from the development would be outweighed by other considerations, including housing land supply.
23. I note the email from the Council's Principal Planning Officer, Kathryn Hughes, of 12 January 2026 17:24, which appears to indicate that the Council no longer maintains that it can currently demonstrate a National Planning Policy Framework compliant supply of deliverable housing land.
24. I have yet to see a SoCG agreed between the main parties. I would encourage the Council and the appellant to finalise their SoCG/s before the CMC.
25. Nonetheless, I would like to use the CMC to gain a better understanding of the respective areas of disagreement between the main parties, and to gauge how appropriate the draft main issues might be.
26. The appellant's evidence will also need to address wider matters raised by interested parties and consultees.
27. At the CMC, you shall identify any other matters that you think may be raised at the Inquiry.

Participants at the Inquiry

28. At the CMC, the appellant and the Council, as the main parties, will be requested to provide me with details of their representatives and professional witnesses for the Inquiry.
29. Participation by other parties will be discussed, including whether there is a likelihood of any Rule 6 party/s coming forward.

Inquiry Format and Running Order

30. In terms of running order, following my opening comments on Day 1, I will invite opening statements from the advocates, which should be no longer than around 10 minutes*, the appellant first, then the Council.
31. I will then hear from any interested parties, which will be followed by the main parties' witnesses. If the Council is aware of any interested parties who have indicated that they wish to speak, to assist me with programming, please flag these during the CMC.
32. At this stage, my intention is that all of the witnesses shall be dealt with in the conventional format for Inquiries, by evidence in chief from the relevant witness for each main party, who will then be cross-examined, following a topic by topic format.
33. After the main evidence there will be the usual roundtable session on conditions and planning obligations.
34. I shall then hear the closing submissions, which should be no longer than an hour**, setting out your respective cases as they stand at the end of having tested the evidence, before I close the Inquiry.

Documents and Evidence

Topic specific statements of common ground

35. I expect expert witnesses to develop topic specific SoCGs to provide details of agreement and disagreement within their specialist areas as appropriate. These may be in a tabulated form and might need to be updated as we progress. I note the draft SoCG produced by the appellant, which is also referred to in Ms Hughes' email.
36. Advice on the preparation of SoCGs can be found here: [Statements of Common/Uncommon Ground for Hearings and Inquiries - GOV.UK](#)

Common terminologies and methodologies

37. To provide clarity and to avoid wasting Inquiry time, I would like expert witnesses to agree terminologies and methodologies in their SoCGs.
38. This includes language used by planning expert witnesses for the weighting of harms and benefits (for instance, *substantial, significant, moderate, limited and little*).

39. Where there are differences, these shall be clearly flagged.
40. At the CMC, and without discussing the evidence, the parties shall flag if there are methodological disagreements which are likely to persist to the Inquiry.

Plans and drawings

41. I note that paragraph 3.24 of the draft SoCG provides a list of plans, along with a schedule of reports. I also note that the appellant would like the appeal to be determined on the basis of revised versions of two of the plans: Landscape Masterplan and Illustrative Masterplan. As landscaping is a reserved matter, at this stage, I anticipate that this is likely to be acceptable. I shall take a final position on this matter following the CMC once I have heard from the Council.
42. As all matters, except for access, are reserved for future consideration, a shorter list of the plans for which detailed consent is sought at this stage also needs to be agreed between the main parties and included in the finalised SoCG.

Core Documents & Library

43. You will need to discuss and agree a list of Core Documents (CDs) in advance of preparing your proofs of evidence so that the CDs can be properly referenced in the proofs.
44. The purpose of the CDs is to avoid the need for witnesses to append documents to their evidence where these are likely to be referred to by more than one witness. They should comprise only those documents to which the parties will be referring.
45. Any Appeal Decisions and/or legal authorities on which the parties rely will each need a note, perhaps best included in the witness's proof of evidence, explaining the relevance of the document to the issues arising in the Inquiry, together with the propositions on which they seek to rely, with the relevant paragraphs identified.
46. At this stage, I suggest that the appellant leads on co-ordinating the list of CDs. It would be helpful if an online set could be made available for us all to use and to allow interested parties to access the documents. I suggest that the Council hosts this on its website.
47. I will probably not require a hard copy set of most of the documents, provided that there is a good quality electronic set. Nonetheless, I may require a hard copy set of some of the materials, especially those relating to landscape and visual impact, for instance photomontages.
48. As we approach the inquiry, I find it helpful for the Council to provide a link to the core document library on a web based 'front page' for ease of use.
49. It can also be helpful for interested parties to include this link on the Inquiry page [Guide to taking part in planning and listed building consent appeals proceeding by an inquiry - GOV.UK](#)

50. I would like a core document list to be provided to me in Word format once everything is agreed.
51. It is essential that parties effectively communicate with one another to seek to narrow the issues for consideration at the Inquiry. This should be an on-going conversation. I encourage on-going work to narrow down and clarify areas of disagreement, but I do expect to be kept up to date and for witnesses to adhere to agreed timetables.
52. The attached Annex sets out the required preferred format and content of proofs.

Inquiry Timetable

53. There will usually be four sessions each day, with comfort breaks mid-morning and mid-afternoon, along with a lunch break.
54. During the Inquiry, advocates are encouraged to help identify suitable times to adjourn to take comfort breaks.
55. Once proofs have been exchanged, each party shall provide detailed timing estimates (openings*, evidence in chief, cross-examination and closings**) so that I can put together a timetable / programme to help with the efficient running of the event.
56. I would like advocates to consider how the programme might be arranged in order to allow them adequate time to write closing submissions.

Conditions and S106 Agreement

57. While the draft SoCG refers to suggested conditions, none are included yet. A full agreed schedule will need to be included in the finalised SoCG or provided as a freestanding document as soon as possible.
58. The list shall be reviewed periodically as evidence is produced to ensure conditions remain relevant and fit for purpose.
59. I note that there are a draft S106 Agreement and reference to potential planning obligations in the SoCG. I would like an update at the CMC, from the appellant and the Council, regarding how the S106 Agreement is likely to progress.
60. Before the Inquiry opens, I would also like an update on any remaining areas of disagreement re conditions / S106 matters.
61. Planning obligations and Conditions will be discussed at a roundtable session towards the end of the inquiry on a without prejudice basis.
62. The appellant is to submit express written confirmation of its acceptance of any pre-commencement conditions within 1 working day of the close of the Inquiry.

Timetable for Submission of Documents

63. The following link takes you to the GOV.UK flow chart of the inquiry process:
[Inquiries process diagram.pdf](#)
64. Following the CMC I shall issue a timetable setting out key steps in the run up to the Inquiry along with deadlines.

Site Visit

65. I shall conduct my formal site visit at some point after the Inquiry has opened. At this stage I anticipate that it may be done on an unaccompanied basis, following an itinerary to be agreed between the main parties. If so, I shall ask the main parties to jointly prepare such an itinerary covering all matters they each want me to see and visit, both on and off-site.
66. All being well, I shall also visit the area prior to the Inquiry on an informal basis.

Costs

67. Local planning authorities, appellants and interested parties who have taken part in the Inquiry process, including statutory consultees, may apply for costs, or have costs awarded against them.
68. Costs may be awarded where a party has behaved unreasonably, and the unreasonable behaviour has directly caused another party to incur unnecessary or wasted expense in the appeal process.
69. I can also make an award of costs, in full or in part, if I consider that a party has behaved unreasonably resulting in unnecessary expense even though another party has not made an application for costs against them.
70. No applications for costs have been foreshadowed as far as I am aware. If any application is to be made, the planning practice guidance makes it clear that, as a matter of good practice, it should be made in writing before the inquiry. While I am not inviting any such applications, if any party intends to make an application it would be helpful to have an indication of this at the CMC for the purposes of timetabling.

Other Procedural Matters

71. You are requested to give consideration in advance regarding whether there are any other matters that should helpfully be discussed during the CMC.
72. Please would the Council ensure that a copy of this Note is made available on its website with the Inquiry documents.

G D Jones

INSPECTOR

10 February 2026

ANNEX

Content and Format of Proofs and Appendices

Content

Proofs of evidence **shall**:

- focus on the main considerations identified, in particular on areas of disagreement;
- be proportionate to the number and complexity of considerations and matters that the witness is addressing;
- be concise, precise, relevant and contain facts and expert opinion deriving from witnesses' own professional expertise and experience, and/or local knowledge;
- be prepared with a clear structure that identifies and addresses the main considerations within the witness's field of knowledge and avoids repetition;
- focus on what is really necessary to make the case and avoid including unnecessary material, or duplicating material in other documents or another witness's evidence;
- where case law is cited in the proof, include the full Court report/ transcript reference and cross refer to a copy of the report/ transcript which shall be included as a core document.

Proofs **shall not**:

- duplicate information already included in other Inquiry material, such as site description, planning history and the relevant planning policy;
- recite the text of policies referred to elsewhere: the proofs need only identify the relevant policy numbers, with extracts being provided as core documents. Only policies which are needed to understand the argument being put forward and are fundamental to an appraisal of the proposal's merits need be referred to.

Format of the proofs and appendices

- Proofs to be no longer than 3000 words if possible. Where proofs are longer than 1500 words, summaries are to be submitted.
- Proofs are to be spiral bound or bound in such a way as to be easily opened and read.
- Appendices are to be bound separately from the proof.
- Appendices are to be indexed using **projecting tabs**, labelled and **paginated**.