



CASE MANAGEMENT CONFERENCE NOTE

Appeal Ref: 6006497

Land at Mount Avenue, Chaldon CR3 5BB

The erection of up to 30 dwellings (including 50% affordable) including provision of vehicular and pedestrian access, landscaping (incorporating SUDs) and other associated infrastructure provision. All matters reserved except scale, layout and access.

Notes from Case Management Conference (CMC) held at 11:00am on 22 June 2026.

Introduction

1. The CMC was led by Simon Rawle BA(Hons) DipTP, Solicitor as the Inspector appointed by the Secretary of State for the appeal.
2. The CMC considered the management of the case so that the appeal is dealt with in an efficient and effective manner. There was no discussion of the merits of the case.
3. At the CMC the Council was represented by Dr Ashley Bowes, Landmark Chambers and the Appellant was represented by Mr Hashi Mohamed, Landmark Chambers.

Participation in the Inquiry

4. I will give an opportunity for interested parties (including local residents) to speak during the opening day of the Inquiry, after the opening statements of the main parties. If not already done so it would be helpful if those intending to speak could inform the Inspectorate's case officer.

The issues and evidence

5. Based on the material currently submitted I set out the main issues in my pre-CMC note. At the CMC the appellant queried whether the main issue that deals with whether the site represents a suitable location for the proposed use was drafted too widely.
6. However, I have taken the wording referenced at the end of the issue from the relevant development plan policy (Policy DP5 of Tandridge Local Plan: Part 2 – Detailed Policies 2014-2029) and so I am content to keep the wording as previously set out. However, the main parties can set out any matters where

there is agreement in the Statement of Common Ground (SoCG) which may narrow the matters covered in this main issue and I am happy to keep the wording under review.

7. On that basis the main issues are worded as:

- Whether or not the proposal would be inappropriate development in the Green Belt having regard to the National Planning Policy Framework and any relevant development policies with particular reference to whether the appeal site represents Grey Belt land and meets the Golden Rules;
- The effect of the proposed development on openness and on the purposes of including land within the Green Belt;
- Whether or not the site is in an appropriate location for the proposed use having regard to whether it represents sustainable development and promotes access by public transport, foot and bicycle to nearby residential, commercial, retail, educational, leisure and recreational areas; and
- Whether or not the harm by reason of the proposal being inappropriate development within the Green Belt, and any other harm would be clearly outweighed by other considerations so as to amount to the very special circumstances required to justify the proposal.

7. At the CMC the Council agreed to provide an update on any review of the Green Belt that may have a bearing on the appeal. Any update should be provided to the case officer with the appellant copied by 29 June 2026.

Procedure and timetable

8. The Inquiry is scheduled as sitting in person (a physical event) at the Council Chamber, Station Road East, Oxted, Surrey RH8 0BT.
9. It will start at 10:00 a.m. on Tuesday 11 August and will continue on Wednesday 12th, Thursday 13th, Friday 14th, Tuesday 18th and Wednesday 19th August 2026.
9. The above sittings will all commence at 10:00 a.m. unless all parties agree otherwise in the light of time pressures.
10. I envisage 1 hour for lunch and short mid-morning and mid-afternoon breaks. I will avoid breaking in mid examination if at all possible and will therefore shorten or lengthen sittings to accommodate that. Generally, I intend to sit to around 17:00 but not beyond 17:30.
11. At the CMC it was agreed that the main issues would be best tested by formal examination/cross examination in the traditional format with the Council presenting their evidence first and then the appellant. Following all of the evidence on the main issues there will be a without prejudice round table discussion on conditions and obligations followed by closing submissions. The

parties agreed to work together to provide a draft timetable by 28 July 2026 for review and I shall circulate the final version of the timetable by Wednesday 5 August 2026.

Documentation

13. The Statement of Common Ground (SoCG) should be used to narrow down the areas of dispute, highlight what is agreed and what is in contention. It was agreed at the CMC that the Council will provide comments on the draft SoCG by 1700 on Friday 26 June 2028 with the final version submitted by 17:00 on Tuesday 7 July 2026 to inform the finalising of proofs of evidence. To assist in the preparation I provide a link to the relevant guidance on preparation of a SoCG. [Statement of common ground - GOV.UK](#)
14. I note that the Council have agreed to host the document library on their website.
15. An agreed list of core documents should be provided no later than 30 June 2026 and Proofs of Evidence should be submitted no later than 17:00 on Tuesday 14 July 2026. Appendices, particularly where they contain large documents, should be broken down into manageable file sizes.
16. Please can a paper copy of each proof be forwarded to the Inspectorate's case officer. It was also agreed at the CMC that the Council would arrange that all documents would be available for interested parties electronically at the inquiry and that hard copies of the proofs would also be available.
17. Any rebuttal evidence should be succinct and timely, submitted by 17:00 on Friday 31 July 2026 and again I would ask that a paper copy is forwarded to the case officer.
18. Any evidence/documentation submitted during the Inquiry, including opening and closing submissions, will have to be copied to the Inspectorate and uploaded on to the core document file. A 'running list' of the documents and their reference number will need to be maintained and all parties are requested to assist in this process.
19. Please can copies of the notification letter/publicity be forwarded to the Inspectorate.

Conditions and legal agreement.

20. The Council agreed to liaise with the appellant and prepare a list of suggested conditions which should be submitted by 14 July 2026 as a word document. If there are any aspects in dispute, then they should be recorded as such.
21. If there are any pre-commencement conditions agreed, the Appellant should confirm in writing that they are accepted. Consideration will need to be given to the tests set out in paragraph 57 of the Framework.

22. A Section 106 agreement is being progressed, and a final draft should be submitted by 1700 on 28 July 2026. In addition, proof of title should be provided along with a CIL compliance statement.

Site visit

24. The site visit will be accompanied, at least the part onto the appeal site itself. I will not be expecting any discussion of the case during the site visit, but physical features can be indicated.
25. I am happy to look at the site from any viewpoints or any other relevant locations that the parties recommend. Indeed, I am open to a viewing schedule being suggested by the parties collectively.
26. At the CMC I emphasised the need to prioritise Inquiry sitting time and to allow time for the preparation of closing submissions so the timetabling of the visit can be flexible.

Costs

27. Any costs applications must be made before the Inquiry is closed. All parties are advised to read the Planning Practice Guidance: Advice on planning appeals and the award of costs on the Gov.uk website.

Summary of main timescales

Statement of Common Ground: 17:00 Tuesday 7 July 2026

Proofs of Evidence: 17:00 Tuesday 14 July 2026

Any rebuttal proofs: 17:00 Friday 31 July 2026

Simon Rawle

INSPECTOR