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**From:** Eileen Paterson

**Sent:** 20 December 2021 16:39

**To:** Dutton, Holly <[HOLLY.DUTTON@planninginspectorate.gov.uk](mailto:HOLLY.DUTTON@planninginspectorate.gov.uk)>; Lizzie Marjoram <[ehm@BWSLaw.co.uk](mailto:ehm@BWSLaw.co.uk)>

**Cc:** [nmatthews@savills.com](mailto:nmatthews@savills.com); Jamie Gibbins <[jamie.gibbins@Barwoodland.co.uk](mailto:jamie.gibbins@Barwoodland.co.uk)>; James Causer <[james.causer@barwoodland.co.uk](mailto:james.causer@barwoodland.co.uk)>; Rebecca Mitchell (<[rebecca.mitchell@barwoodland.co.uk](mailto:rebecca.mitchell@barwoodland.co.uk)> <[rebecca.mitchell@barwoodland.co.uk](mailto:rebecca.mitchell@barwoodland.co.uk)>

**Subject:** RE: Planning Inspectorate APP/P0119/W/21/3288019: Land to the west of Park Farm, BS35 [EXTERNAL]

Hello Holly,

Thank you for the agreement to allow an extension of time for the Council to submit its Statement of Case. I have noted this also applies to the Agreed Statement of Common Ground.

Regards  
Eileen

**Eileen Paterson**

Major Sites Manager

South Gloucestershire Council

[eileen.paterson@southglos.gov.uk](mailto:eileen.paterson@southglos.gov.uk)

Tel: 01454 864549

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**From:** Dutton, Holly <[HOLLY.DUTTON@planninginspectorate.gov.uk](mailto:HOLLY.DUTTON@planninginspectorate.gov.uk)>

**Sent:** 20 December 2021 15:29

**To:** Lizzie Marjoram <[ehm@BWSLaw.co.uk](mailto:ehm@BWSLaw.co.uk)>; Eileen Paterson <[Eileen.Paterson@southglos.gov.uk](mailto:Eileen.Paterson@southglos.gov.uk)>

**Cc:** [nmatthews@savills.com](mailto:nmatthews@savills.com); Jamie Gibbins <[jamie.gibbins@Barwoodland.co.uk](mailto:jamie.gibbins@Barwoodland.co.uk)>; James Causer <[james.causer@barwoodland.co.uk](mailto:james.causer@barwoodland.co.uk)>; Rebecca Mitchell (<[rebecca.mitchell@barwoodland.co.uk](mailto:rebecca.mitchell@barwoodland.co.uk)> <[rebecca.mitchell@barwoodland.co.uk](mailto:rebecca.mitchell@barwoodland.co.uk)>

**Subject:** RE: Planning Inspectorate APP/P0119/W/21/3288019: Land to the west of Park Farm, BS35 [EXTERNAL]

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## Hackers don't take time off for Christmas

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Dear All,

Please note this deadline extension also applies to the agreed Statement of Common Ground.

Kind regards  
Holly

Holly Dutton | Inquiries & Major Casework Team

**The Planning Inspectorate**

3J Kite Wing, Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6PN

[holly.dutton@planninginspectorate.gov.uk](mailto:holly.dutton@planninginspectorate.gov.uk) | 0303 444 5022

<https://www.gov.uk/government/organisations/planning-inspectorate> | [@PINSgov](#)

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**From:** Dutton, Holly

**Sent:** 20 December 2021 15:27

**To:** Lizzie Marjoram <[ehm@BWSLaw.co.uk](mailto:ehm@BWSLaw.co.uk)>; Eileen Paterson <[Eileen.Paterson@southglos.gov.uk](mailto:Eileen.Paterson@southglos.gov.uk)>

**Cc:** [nmatthews@savills.com](mailto:nmatthews@savills.com); Jamie Gibbins <[jamie.gibbins@Barwoodland.co.uk](mailto:jamie.gibbins@Barwoodland.co.uk)>; James Causer <[james.causer@barwoodland.co.uk](mailto:james.causer@barwoodland.co.uk)>; Rebecca Mitchell ([rebecca.mitchell@barwoodland.co.uk](mailto:rebecca.mitchell@barwoodland.co.uk)) <[rebecca.mitchell@barwoodland.co.uk](mailto:rebecca.mitchell@barwoodland.co.uk)>

**Subject:** RE: Planning Inspectorate APP/P0119/W/21/3288019: Land to the west of Park Farm, BS35

Dear All,

Thank you for your emails.

We will allow the Council an extension for their statement of case however, due to the Inspector's scheduled preparation time we would need to receive the statement by no later than **close of play Friday 28 January**.

Kind regards

Holly

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Holly Dutton | Inquiries & Major Casework Team

**The Planning Inspectorate**

3J Kite Wing, Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6PN

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<https://www.gov.uk/government/organisations/planning-inspectorate> | [@PINSgov](#)

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**From:** Lizzie Marjoram <[ehm@BWSLaw.co.uk](mailto:ehm@BWSLaw.co.uk)>

**Sent:** 20 December 2021 13:35

**To:** Eileen Paterson <[Eileen.Paterson@southglos.gov.uk](mailto:Eileen.Paterson@southglos.gov.uk)>; Dutton, Holly

<[HOLLY.DUTTON@planninginspectorate.gov.uk](mailto:HOLLY.DUTTON@planninginspectorate.gov.uk)>

**Cc:** [nmatthews@savills.com](mailto:nmatthews@savills.com); Jamie Gibbins <[jamie.gibbins@Barwoodland.co.uk](mailto:jamie.gibbins@Barwoodland.co.uk)>; James Causer <[james.causer@barwoodland.co.uk](mailto:james.causer@barwoodland.co.uk)>; Rebecca Mitchell ([rebecca.mitchell@barwoodland.co.uk](mailto:rebecca.mitchell@barwoodland.co.uk)) <[rebecca.mitchell@barwoodland.co.uk](mailto:rebecca.mitchell@barwoodland.co.uk)>

**Subject:** RE: Planning Inspectorate APP/P0119/W/21/3288019: Land to the west of Park Farm, BS35

Dear Holly

Please could the appellant register concern about slippage in the appeal timetable if the LPA's request for an extension of time is approved. The request was only made last week however the appellant gave prior notification of the request for a Rosewell Inquiry appeal to the LPA on 1 October 2021. The appellant filed the appeal on 30 November 2021 and sent all papers to the LPA electronically on the same day.

Kind regards

Mrs Lizzie Marjoram

**Please note I am currently working from home the quickest methods of contact are email or my mobile number 07540 450773**

**COVID-19 UPDATE:**

Our business is continuing as usual despite the restrictions arising from Coronavirus. In order to comply with social distancing measures, we will not hold face to face meetings, except in exceptional circumstances. **Please do not attend our office without a prior appointment.**



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**From:** Rebecca Mitchell <[rebecca.mitchell@barwoodland.co.uk](mailto:rebecca.mitchell@barwoodland.co.uk)>  
**Sent:** 17 December 2021 15:18  
**To:** Eileen Paterson <[Eileen.Paterson@southglos.gov.uk](mailto:Eileen.Paterson@southglos.gov.uk)>; [HOLLY.DUTTON@planninginspectorate.gov.uk](mailto:HOLLY.DUTTON@planninginspectorate.gov.uk)  
**Cc:** [nmatthews@savills.com](mailto:nmatthews@savills.com); Tonya Meers <[Tonya.Meers@southglos.gov.uk](mailto:Tonya.Meers@southglos.gov.uk)>; Lizzie Marjoram <[ehm@BWSLaw.co.uk](mailto:ehm@BWSLaw.co.uk)>; Jamie Gibbins <[jamie.gibbins@Barwoodland.co.uk](mailto:jamie.gibbins@Barwoodland.co.uk)>; James Causer <[james.causer@barwoodland.co.uk](mailto:james.causer@barwoodland.co.uk)>  
**Subject:** RE: Planning Inspectorate APP/P0119/W/21/3288019: Land to the west of Park Farm, BS35

Dear Holly

The changes to the timetable that the Council has proposed would have material knock on implications for the rest of the programme set out, and we would please like a right to respond on the points raised in Ms Paterson's email below if PINS is minded to consider this request.

Our agent, Lizzie Marjoram, for this appeal returns on Monday and we will provide a response on our behalf then.

Many thanks

Rebecca

**Rebecca Mitchell**  
Planning Director

D 01604 369226  
M 07880 358201

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**From:** Eileen Paterson <[Eileen.Paterson@southglos.gov.uk](mailto:Eileen.Paterson@southglos.gov.uk)>

**Sent:** 17 December 2021 14:54

**To:** [HOLLY.DUTTON@planninginspectorate.gov.uk](mailto:HOLLY.DUTTON@planninginspectorate.gov.uk)

**Cc:** Rebecca Mitchell <[rebecca.mitchell@barwoodland.co.uk](mailto:rebecca.mitchell@barwoodland.co.uk)>; Tonya Meers <[Tonya.Meers@southglos.gov.uk](mailto:Tonya.Meers@southglos.gov.uk)>;  
Lizzie Marjoram <[ehm@bwsllaw.co.uk](mailto:ehm@bwsllaw.co.uk)>

**Subject:** Planning Inspectorate APP/P0119/W/21/3288019: Land to the west of Park Farm, BS35

**Importance:** High

Dear Holly,

Further to the correspondence yesterday and following receipt of the Start Letter dated 13 December 2021, I am writing to set out the Council's position regarding the inquiry timetable.

The current timetable presents a problem for the Council. Since this is an appeal against non-determination, the Council will now take a report to committee so as to confirm its position and any putative reasons for refusal in the usual way. This will enable it to set out its position in its Statement of Case. However, the proposed deadline for the submission of its Statement of Case and the Statement of Common Ground (17 January 2022) pre-dates, by three days, the Council's next strategic sites planning committee, which is due to be held on 20 January 2022, which is the committee that will need to consider this proposal. The appeal was only submitted on 30 November 2021, and the Start Letter was not received until 13 December 2021. The Council's strategic planning committee is not meeting in December, and the Council is proposing to take a report to the first available committee date (20 January 2022). However, it will clearly not be possible for the Council to submit a meaningful Statement of Case before that meeting in accordance with the current timetable.

Furthermore, the Council is also due to publish a new monitoring report at the end of December 2021, setting out its updated five year supply position, which will clearly be relevant to the Council's decision and the appeal and its Statement of Case.

Accordingly, the Council respectfully requests that the current deadline for the submission of its Statement of Case and the Statement of Common Ground is deferred by 2 weeks to 31 January. Although this extension would still only give the Council just over 1 week to submit these documents following the meeting of the planning committee, the Council has endeavoured to suggest a date that would not cause any further disruption to the current inquiry timetable, including the proposed date for the CMC on 7 February 2022.

I would be grateful if you could confirm that the proposed extension is acceptable as soon as the Inspector has had an opportunity to consider it. Otherwise the Statement of Case we will have to submit will not really serve any useful purpose.

Yours Sincerely,

**Eileen Paterson**

Major Sites Manager

South Gloucestershire Council

[eileen.paterson@southglos.gov.uk](mailto:eileen.paterson@southglos.gov.uk)

Tel: 01454 864549



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