

PINS and Needles: Good (and Bad) Practice at Appeals

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Introduction

The purpose of the paper is to give an insight into the role of the Planning Inspectorate, from an Inspector's point of view. By getting to know more about the day to day operation of the Inspector role and exploring good and bad practices, we can build up a picture of how to work together to improve the appeal process.

I have been a Planning Inspector for over 15 years, undertaking a large number of appeals as written representations, Hearings and Inquiries from the most straightforward to the most complex. I also have considerable experience in examining Local Plans. I have managed Inspectors for many years, been involved in training and recruitment and worked on strategic projects. Over my long career at the Planning Inspectorate, I have become very familiar with good (and bad) practice.

Setting the scene

About the Planning Inspectorate

The Planning Inspectorate is responsible for a wide variety of work, including:

- Development plan examinations.
- Planning, enforcement and listed building appeals.
- Applications which have been "called-in" by the Secretary of State or Welsh Ministers.
- National Infrastructure Applications.
- Rights of Way and other specialist casework.
- Work for other government departments (including the Departments for Environment, Food & Rural Affairs and Transport).

Over each of the last five years we dealt with between 15,000–19,000 appeal cases per year with this figure rising as set out below. In addition, Inspectors examine around 60 Local Plans and determine 15 or so National Infrastructure projects per year, carry out work related to Rights of Way, Environmental Planning, Common Land, Hedgerows and other specialist work we take for other Government Departments. Table 1 sets out details of appeals and call-ins received over the last five years.

Table 1¹

Fiscal Year	HAS/CAS	WR	H	I	Total	HAS/CAS	WR	H	I
2013–2014	4605	8543	964	498	14610	32%	58%	7%	3%
2014–2015	5372	9380	865	488	16105	33%	58%	5%	3%
2015–2016	5339	10430	905	468	17142	31%	61%	5%	3%
2016–2017	5984	10718	670	418	17790	34%	60%	4%	2%
2017–2018	5899	11580	1450	349	19278	31%	60%	8%	2%
<i>Total</i>	<i>27199</i>	<i>50651</i>	<i>4854</i>	<i>2221</i>	<i>84925</i>	<i>32%</i>	<i>60%</i>	<i>6%</i>	<i>3%</i>

¹ WWW.GOV.UK Inquiries Review data.

The majority of appeals are dealt with by written representations (“WR”) casework, but, in reality, it is cases that are heard at Inquiries and Hearings that bring forward the large scale development (for example 20,000 houses in 2016/2017 at Inquiry, compared to 10,000 for WR and Hearings).²

When appeals are submitted to the Planning Inspectorate they are assessed for their level of complexity and whether they are likely to have evidence of specialist nature. A combination of the level, the specialisms and the location assist in the allocation of the casework to the appropriate Inspector.

Technology will influence ways of working in the future and we have a programme of Digital Transformation underway. For example, we hope to see new digital systems in place that will allow you to track your appeal and see the case file, including the information submitted. Other changes to ensure that only valid appeals are accepted by the Planning Portal will reduce time taken in going back to get missing information from the parties. At present, we set up an electronic file for all cases, although WRs are the only case types that proceed solely electronically and generate very little paperwork for Inspectors. Local Plans are already largely working electronically, relying on the Council’s evidence base, which eliminates the passage of a great many boxes around the country!

There is no doubt that electronic working will feature more at Hearings and Inquiries, and it would be beneficial for us to work together to update our practices. We need to be certain that information can be accessed by everyone in the same way. As part of the Digital Transformation, the Planning Inspectorate is exploring electronic solutions, ensuring that all parties have equal access to relevant appeal documents.

One persistent and ever growing problem we all encounter is the large amount of background and supporting information that comes forward. Critical appraisal of what the Inspector needs to see would be really helpful. Sometimes you need only provide relevant extracts rather large documents and be more focused about directing the Inspector to the information on the key issues. Do we really need all of the Core Document, which are the ones that are really relevant? It is unrealistic to expect an Inspector to read everything submitted in the Core Documents and at some large Inquiries Inspectors may ask the advocate to advise on which documents they expect to be read or what key documents are needed for next day or week.

Some Inspectors like paper documents but before you press “print”, check to see if an electronic list and version will suffice. Many Inspectors are very happy to work from electronic versions. However, if you do send an electronic version of the Core documents or other documents, make sure that the information is available in the same form to the other main party(s), so that everyone has the opportunity to access documents in the same way.

About Planning Inspectors

We have around 250 full time equivalent Planning Inspectors. Most are qualified town planners, but we draw from lots of other professions including architects, landscape architects, engineers, surveyors and solicitors. However, the key point is that when you join, no matter where you are from or what your background is, you become an Inspector. The majority of Inspectors are generalists and can do a variety of casework. They are capable of handling technical material from an evidence base no matter what the source, from highways to housing.

Inspectors do not all come from Bristol for the day (a very common assumption) but are based at home and are living all over the Country. It is not surprising, that matching Inspectors, their specialisms experience and location to appeals is a highly complicated process. This can, on occasion, mean travelling long distances, or causing delays in setting event dates. It is usually the case, that Inspectors undertaking complex casework including Inquiries are the most experienced Inspectors.

² *WWW.GOV.UK* Inquiries Review data.

Planning Inspectors get constant updates on knowledge and policy, with a strong emphasis on continuous learning, mentoring and developing skills. We find out where Inspectors lack skills and aim to build training programmes to suit. The outcome of complaints and challenges feeds into our training programmes to help us avoid these in the future. For new Inspectors continuous training and monitoring takes place for some time to build the skills necessary for all types of casework. For all Inspectors, we have regular training events and produce a variety of literature filled with updates on key issues and specialisms, case law, policy and procedure. We know that it is not perfect and we rely on Inspectors training Inspectors which is very good for passing on skills, but perhaps being open to external expertise may widen our knowledge and make us better Inspectors. It would be interesting to know how you think we could improve.

Inspectors' work programmes

Staff and systems based at Temple Quay House provide all the necessary support to Inspectors to enable them to undertake casework. This is a comprehensive and much appreciated support network that frees up Inspector time which is devoted to preparation, undertaking events and reporting on appeals casework. For the parties, contact is usually with the case officer or major casework team and they are very helpful on procedural matters including liaising with the Inspector.

Work programmes are full and busy. For most appeal cases dealt with by WR, the work programme for Inspectors is around three to four appeal cases per week. Preparation of cases on the Monday, followed by visits on the Tuesday and reporting for the rest of the week. Hearings are prepared in a day, sit for a day and report for a day with longer preparation and reporting if needs be. Inquiries generally follow a ratio of the number of sitting days to the amount of time needed for preparation and reporting. For example, three Inquiry sitting days might accrue two days of preparation and four days for reporting. More time is available if needs be, for example where there is a particularly large volume of material or issues appear to be more complicated than first thought. Absorbing information, thinking quickly, and writing concisely are valuable skills for Inspectors.

What do Inspectors expect from the parties in WR, H and LI?

Presentation of case

Inspectors deal with a high volume of casework and our charts can be booked for six weeks to a year ahead, depending on the case type. The amount of time available to read the parties' cases is short (less than two hours for a WR case). For each appeal, the time scheduled for preparation, the event and reporting must be put to best use to ensure an efficient turn-around of casework.

My advice is to "think Inspector"—put yourself in the shoes of the Inspector and think about the time available for all types of casework. Organise information with that in mind by presenting clear arguments with plenty of signposts and headings. Send a list of submitted documents, index, paginate and clearly title each document. Set out the references of appeal plans and make sure you send the right ones to the Inspector (there is often a myriad of plans to wade through). Absorbing information quickly can be aided by straightforward language, bullet points, plans, diagrams and visual aids. It helps everyone if the proofs of evidence are consistent between different witnesses, and there is little overlap as possible. Where there is technical evidence we need clear descriptions and explanations to unlock technical evidence and help us understand the issues.

For WR, Hearings and Inquiries:

- follow the procedural guidance;
- provide all the necessary documents at the right stages to avoid delay;

- meet all of the deadlines set out in the timetable;
- adhere to any deadlines set out in pre-event inspector requests;
- avoid surprises;
- make every effort to get it right in the first place so you do not need to add new grounds, submit late documents or send post-event correspondence; and
- if there is late evidence, liaise with the other main party as early as possible so they can be prepared and respond in good time.

Content of case

It is very important that you have the opportunity to present your case in full. However, focused arguments which are tightly drawn around the important issues are more useful than long documents, full of extraneous information. Aim for shorter proofs that deal with specific issues rather than reams of paperwork setting out unnecessary information.

The type of information to leave out completely would be policies not relevant to the main issues, local and national policies that are set out in full elsewhere, extensive details of previous dealings with the Council or appellant and full transcripts of high court cases. Including unnecessary information can often obscure the main points you wish to make and it can be hard for the Inspector to find the important bits. It is better to save the detail for the appendices in case they need to be referred to and focus on issues in dispute.

Be rigorous in avoiding repetition, fluff, or flannel. You only need to make a good point once or have one key issue on which the case turns. Avoid make-weight arguments. The case should primarily be argued on the principal issues. Throwing in weak arguments to try and add weight in favour can undermine the case. If it is genuinely considered that it adds something to the argument mention it but do not labour the point.

If you are very familiar with the case and the area, it is easy to assume too much and take a flying leap with the evidence, without justifying it, forgetting that the Inspector is coming to the area and the case afresh. Therefore, when you prepare, watch out for assertions, statements without evidence and missing details. Some issues may also need the evidence on the key points taken in a few, smaller steps in your submission so the Inspector fully understands your case.

If you are an appellant, please take the opportunity to address interested parties' cases put forward during the planning application and appeal stage. It is always helpful to have a short section in the statement or proof that addresses these as the Inspector wants to understand how matters raised by local residents and interested groups have been considered by you.

Technical evidence

Technical or specialised evidence often underpins arguments on a variety of issues, both simple and complex. The interrogation of technical evidence is often critical at Inquiries (and some Hearings) in assisting the Inspector to evaluate the information they need to determine an appeal. It can be the reason why an Inquiry is necessary. There is usually common ground between the parties on lots of areas of technical evidence. It is very helpful and saves time at an event if these can be agreed beforehand. Agreeing definitions, agreeing where the methodology differs and whether this makes a difference is a good start. Statements of Common Ground (addressed below) on a particular topic are invaluable, as this gives the opportunity to hone down the arguments to where it really matters.

For Inspectors, there are probably two kinds of technical/specialist evidence. First, evidence they are familiar with; an example might be Landscape and Visual Impacts Assessments ("LVIAs"), which are fairly common documents seen at many appeals. It is generally not necessary to spend a long time on the

methodology in your statements and proofs, although having this as an appendix might be useful. What is most helpful is not to get hung up on the technical, to move the evaluation and consequences on to jargon free, easy to understand language. Helping the Inspector and all parties to understand the issues by relating it back to people and places will better illustrate your point. There is no need to spend a huge amount of time on things that the Inspector can see for themselves and form a view on at the site visit.

There are often more complex, highly specialised technical issues in appeal casework for large schemes. Examples that come to mind are noise, traffic and housing. In these cases, there is a responsibility on the witness and it is the role of a good advocate, to help the Inspector understand the technical issues, language and concepts. We need the technical detail unlocked with clear explanations and simple (but not simplistic) language. It is essential to work closely with the Inspector to ensure they understand your case completely before the close of the event.

Complex casework often turns on the big picture, the planning balance, the policies taken as a whole. Make sure that one of the witnesses spends time bringing together all of the arguments and explains the conclusions in some detail to the Inspector.

Legal advice before the event

Good practice would suggest that Inspectors should engage before the event, but equally advantageous is for a barrister or solicitor to have early sight of a case. This could be an important opportunity for some critical assessment. Much time can be wasted by seeking to pursue arguments that later get discarded in the cold light of the evidence. A barrister or solicitor could identify the strongest and perhaps weakest arguments and help focus these on the points that really matter.

Legal points and requests for rulings

Try and avoid asking the Inspector to make rulings if at all possible. Let the Inspector take submissions but accept that they may not want to come to a conclusion until they write their decision. If there is a difficult legal issue that arises at an Inquiry the Inspector will often seek to resolve this by batting the issue to each advocate in turn to get clarity and resolution. Where legal points or rulings are unavoidable or seeking the adjournment of the event, it is essential for the Inspector to see these in advance, even if they go on to hear submissions and make a finding on the opening day.

Case law

The relevant case law brought to the Inspector's attention is necessary and sometimes full transcripts can be useful, but clarity is needed over the over the part that is relevant. Explaining the case, divesting it of legalistic language in a short paper, before the event and directing the Inspector to the parts which are relevant to the appeal really help.

Statements of Common Ground

Within five weeks of the start date for Hearings and Inquiries the appellant and LPA should submit an agreed Statement of Common Ground (a draft should be submitted when the appeal is made). It would be helpful for the parties to be working together on common and uncommon issues as early in the process as possible.

Some Statements of Common Ground add little because they cannot agree or help to eradicate some of the issues and disputes. However, where statements agree to disagree on key matters in dispute they are hugely valuable documents. It might only be one element, for example, an aspect of methodology, but

a clear non-technical explanation of why there is a disagreement can help the Inspector understand the essence of the difference between the parties.

Inspectors are quite happy to receive a number of topic based Statements of Common Ground, in draft if data and details are still being agreed. Housing, landscape and viability come to mind as suitable topics for separate statements. Inspectors are, of course, aware that Statements of Common Ground do not prevent any matter raised by another party being a main issue at an appeal.

In compiling Statements of Common Ground the procedural guidance³ should be followed. It helpfully suggests:

- be concise and not duplicate information already sent—by anyone;
- explain revisions or amendments to the original proposal and confirm if they were agreed at application stage;
- include a list of the agreed plans and drawings on which the Inspector will be asked to base his or her decision and which were considered at application stage;
- include a list of agreed and/or shared core documents, ministerial statements, and policies and references to any relevant passage of the National Planning Policy Framework;
- include relevant statutory and emerging development plan policies, their status and the suggested weight to be attached to them and Supplementary Planning Guidance and Supplementary Planning Documents;
- identify and provide the reference number(s), of any relevant appeal decisions, relating to the site or neighbouring sites;
- identify whether there is/is not agreement over measurements;
- identify agreed elements of the evidence and any technical studies that have been undertaken;
- include a list of suggested conditions (agreed and not agreed) and include the reasons why the conditions are suggested; and
- say if there is a draft planning obligation which would satisfactorily address one or more of the reasons for refusal.

Planning obligations

The Inspector should have early sight of a Planning Obligation. The completed version must be submitted with the appeal in the case of WR. For Hearings and Inquiries it is very useful to have the completed document before the event. If not the completed document, a draft with areas where there are outstanding disputes as this helps to focus any later session on the document. In all cases, early work helps the Inspector understand why the obligation is necessary and how it complies with statutory tests can save much time at the event. It is very useful to have a table or statement agreed between parties which assesses compliance with regulations and gives reasons for any disagreement.

WR—other points

WR—be proportionate, try not to overload the Inspector with information, keep statements short. Do provide details of where you would like the Inspector to view the site and surroundings from when they visit. Do make the correct access arrangements.

³ The Planning Inspectorate, Procedural Guidance, Planning Appeals—England (July 2018).

What makes a good advocate and planning witness, what are the common pitfalls of presenting a case and how can participants avoid them?

Inquiries and Hearings are very different types of events. Although they have planning matters and issues in common, the skills and behaviours of advocates and witnesses and what is good practice is not the same. The next section looks at both types of events, starting with Inquiries.

Inquiries

Pre-event preparation is helpful for everyone. Knowing the number of witnesses, the time they will take and having a list of the order of appearance, as early as possible enables the Inspector to prepare a timetable. In my experience, the timetable has been a useful guide, but I would prefer to see working together in advance to agree a timetable, which all were prepared to adhere to. I would also be happy for you to request a topic based Inquiry or some sessions are round table discussion if this would be more efficient.

What makes a good advocate?

A good advocate helps the Inspector to gather the information necessary for the decision. For me, a good advocate ensures the Inspector is fully aware of the party's case. They robustly test evidence of opposing side. They marshal witnesses and oversee evidence, which has many parts, into the bigger whole. They bring a necessary degree of precision and rigour to the process. They cut through the extraneous information and get to the point.

The best run Inquiries are where the advocates have a working relationship which enables and facilitates discussion on matters, sometimes outside the Inquiry which can move things forward. They take direction from the Inspector about moving on with evidence or swifter presentation. Respect, good humour, quiet persistence with witnesses and working positively with the Inspector all help.

The elements that make up an Inquiry are generally the same. To help understand what makes a good advocate, I carried out a survey of experienced Inspectors. These are unscientific, off the top of the head comments, but useful, nonetheless. Here is a summary what they had to say:

- **Openings:**

Inspectors find these useful to set the scene and to allow the main parties to be introduced to the Inquiry room. Concise and focussed openings are the best, picking out the main issues and summarising the requisite information. A heads up on how you are going to tackle the other parties' proofs and rebuttals, and acknowledging the concerns of interested parties and how they will be addressed is helpful.

- **Evidence in Chief:**

It is useful to have the case aired and draw out what is fact and what is judgement. However, it should be assumed that the Inspector has read the proof and the summary, so keep evidence in chief tightly focussed and reasonably short. The really useful bit is to explicitly direct the witnesses to the matters that make a difference, and drill down to the detail where you need to. Explore with the witness where the other side have got it wrong and why, but avoid a long cross examination of the other proof. If you are an advocate for the appellant, elicit responses to interested parties objections. Keep it interesting and build up a rapport with the witness that can help demonstrate their competence and ability. Technical, highly specialised evidence is an area where the advocate should work with the Inspector to find a pace to suit. Describe and explain methods and processes, guiding the Inspector through the evidence.

- **Cross examination:**

Is of course the exciting bit, the part a witness dreads, and I suspect the advocate enjoys the most. For Inspectors, testing the evidence is one of the main reasons for the Inquiry and should be focussed, robust and thorough. It is helpful if this is logical and straightforward, concentrating on matters that define the case, especially on the differences between the relevant witnesses. It should not be about testing the witnesses' resilience and there is no need to keep repeating a question until the witness gives in. If they do not give the answer you want, put the answer you want to them, give them the chance to comment and move on. Build-up questions which have about five pre-questions can waste time—get to the point and ask the killer question. It is helpful to recognise when you have made your point and stop there. Be brief, takes things quickly, try and keep to time estimates and avoid repetition. Persuasive advocacy relies on a good case, knowledgeable, well prepared witnesses, and clear and straightforward communication.

By and large, advocates are gentle on interested parties which may be advisable as it can be frightening to be cross examined. It is worth exploring and challenging responses with some witnesses and the views they have expressed. Generally, advocates are getting the balance right.

- **Re-examination:**

This should not be used to rescue a witness who has made a concession unhelpful to the case. However, it can be useful to straighten up and clarify issues, cut through the muddying of waters that can happen in cross examination.

- **Closing:**

This is one of the most valuable parts of the proceedings and is most helpful produced in writing. It is often the item that Inspectors turn to first after the event and is invaluable in Secretary of State casework to report the parties' case. Emphasising the important points but being succinct and to the point is good. Closing submission are often the place where the big picture, which draws together all of the evidence, the policies as a whole and the planning balance can be best expressed. Leave out any references to unreasonable behaviour which can be put in a costs application. Reading out loud at an event can take a long time. If it is to be a lengthy closing session (1.5 hours or more), factor in short breaks. A really good closing includes key references to specific parts of evidence that you may need for your decision. It can be a fabulously useful road map of your case having heard the evidence.

The Inspectors surveyed were all keen to pass on how much they appreciated advocates help at Inquires. Working together for a smooth event was much appreciated especially where they are long and difficult.

What makes a good witness?

Being an expert witness involves presenting evidence in front of a lot of people which can be intimidating and difficult when it is not your day job. Where you are less familiar with being an expert witness, practice some presentation techniques before the event. Think about your body language and your tone of voice. If you are quiet, like me, practice speaking more loudly and make sure there are microphones. Be enthusiastic, this is your topic and that can help to get the evidence across, particularly if it is very complex. Ask the advocate for guidance and let them know if you are nervous, they will always help you through

the event. Inspectors know how difficult this is and many have come from a background where they have been a witness so they understand.

Check through your evidence for any errors and bring these to the Inspectors' attention, at any time. It is better to have these cleared up, than for the Inspector not to have the correct information. Before you give evidence, check you have the right documents and know where they are. Put them back in the same place so you can find them.

Knowing your case and the opposing witnesses' case in fine detail and being able to respond confidently is essential. Know where the points are that differ between the expert witnesses and prepare for questions that might be asked. Try not to have questions where you read off a prepared answer sheet, but answer from your knowledge and skills. Where evidence is technical, it can be helpful to explain more slowly and in smaller steps to unlock the evidence. Be led by your advocate who will help you.

When it comes to the questions, listen carefully—think about what are you being asked and why? If you don't understand or get lost, ask for the question to be repeated. Do wait for the question to be asked rather than anticipate. In cross examination, answer the questions even if it is "yes" or "no" and then go on to qualify your answer. However, if you want to qualify an answer and the cross examining barrister is cutting you short, you can ask the Inspector if you can add more. The Inspector may find the qualification more useful than the yes or no answer. Try not to be long winded and repeat chunks of your case from the proofs. Keep your responses as clear and simple as possible and do not use jargon. Complex cases nearly always turn on a balance of factors and being realistic and accepting adverse impacts, where they exist, can save time and be very helpful.

Where interested parties give evidence the Inspector will ensure fair treatment. The Inspector would set out the procedure as it goes along, help to explain questions and make every effort to ensure that the parties put forward their case. To gauge how this might influence the timing of events it is very helpful for the Inspector, the Council and the appellant to know in advance if they are going to speak and have a copy of what they will say. Cross examination is part of the Inquiry so they should be prepared in a similar way to the expert witness, to have evidence confronted and challenged. They may be invited by the Inspector to ask the questions of opposing witnesses, and they should be focussed and prepared if this happens.

Visual aids and presentations

The way information is displayed is moving forward at a rapid pace, and over time technology may influence material that comes forward at Inquiries and Hearings. We welcome visual aids such as images and models that are agreed, but anything that involves presentations, like an architect presenting a scheme, may be difficult as it is not evidence capable of being tested. Inspectors are often reluctant to accept presentations for this reason. Presenters can also take over the Inquiry moving away from the impartial atmosphere set by the Inspector. They can even annoy parties and stir up issues around matters that the Inquiry does not want to focus on. There is also a fairness issue as they can leave participants perceiving that one side has an advantage. It may open the door to everyone seeking to give a presentation, with a loss of rigour. So be cautious and take advice from a barrister or solicitor before going down this route.

Hearings and round table sessions at Inquiries

At Hearings and round table sessions barristers, solicitors and witnesses take on a different role. There is no formal presentation of case and usually no cross examination and it is not usually an adversarial environment. It is a discussion which the Inspector will directly lead, asking questions of the parties. Although they appear less formal they are carefully organised, often following an agenda prepared by the Inspector which will inform how it proceeds. The sessions are topic based and this enables participation

in the discussion for everybody. It works well for the Inspector who can gather the information in a structured way.

As with Inquiries the inspector will have read all of the evidence and there is no need to repeat or read this out at the event. Normally Inspectors would not welcome cross examination at hearings. More commonly questions are asked through the Inspector rather than across the table as this can diffuse tension and seem less intimidating. Closings can be very helpful particularly where there are complex issues. Let the Inspector know before or during the event if you would like to give a closing submission.

Advocates at Hearings can be very helpful, particularly in summarising complex issues, focussing the discussion, addressing legal and policy issues, and leading the team of people—a sort of project manager. However, sometimes an advocate's role can be very unclear to the Inspector and good practice would be to explain what it is, as part of the team. You should advise the Inspector in advance if a barrister is to be present. It is most important to adapt your style to suit the event. Events can be very varied, taking place in formal settings or in small venues and village halls, with professional and non-professional people around the table. Just the presence of a barrister or solicitor can be intimidating and suppress other people coming forward. Forceful questioning or direction is not appropriate. However, the experience of having an advocate at a Local Plan examination is very positive and Inspectors find them particularly helpful, with the right approach.

For expert/professional witnesses it is much the same as Inquiries, be just as prepared as if it was an Inquiry, your submissions are no less important because the event type is less formal. Expect difficult questions, be prepared to be challenged and confronted on your evidence. Make sure it is justified and correct.

Pitfalls

The pitfalls are embodied in the text of the paper and I would be repeating myself if I set them out here. However, for all the behaviours and practices set out as good, you can take it as read that the opposite is generally true for pitfalls.

Conclusion

This article is about how you can help Inspectors and the conclusions drawn are often related to working together. Abiding by procedure rules and timescales, having the correct material available at the right time, liaising to agree common and uncommon ground much earlier in the process can help. However, this is not the end of the story and Inspector intervention at the right time and in the right way is a key component in improving the way we work. It is not the subject for this paper but is something for the Planning Inspectorate to consider.

My final word is that this article is my view and is not a Planning Inspectorate document. It does not stray from advice in the procedural rules or Planning Inspectorate guidance. Nevertheless, it should not be regarded as formal advice and used in evidence against me (or any other Inspector!).