

I am the Senior Strategic Planning Manager for Persimmon Homes Limited in our South Coast Region and I am submitting a response to Foreman Homes' Satchell Lane, Hamble appeal [Reference: APP/W1715/W/22/3292580]. Persimmon Homes Limited own the freehold interest in the adjoining Hamble Airfield site. A plan of Persimmon's adjacent land is shown on the attached Location Plan (DOCUMENT 1).

The Airfield site is the subject of a submitted planning application for minerals extraction. This application is unlikely to be determined for a number of months. Discussions are ongoing between the applicant and lease holder (CEMEX) and the Minerals Authority regarding the scheme, including changes to the submitted Restoration Plan.

I note from the submitted Proof of Evidence documents provided by Foreman Homes that the appellant makes reference to the inclusion of a western footpath link to connect the appeal site with the Public Right of Way (PROW) (Route 1) that runs north-south close to the boundary between the two sites. An alignment of this PROW is shown on the Appellant's attached Illustrative Landscape Plan (Drawing Ref: 403.064427.00001.SL1 September 2022) (DOCUMENT 2), and within the landscape Proof of Evidence. Multiple references to this link are also made in Mr Hillson's Design Proof of Evidence and Mr Brown's Planning Proof of Evidence. I have not undertaken a complete review of all appeal documentation at this stage, so there may be other references to this connection.

Based on my review of the appellant's evidence, the appellant is putting forward the impression that a link can be formed between the appeal site and the PROW without impinging on Persimmon owned land. However, as shown on the attached Hampshire County Council Definitive Rights of Way map (DOCUMENT 3), which should be viewed as the true alignment of the PROW, the PROW is not contiguous with the appeal site boundary, and there is intervening land owned by Persimmon Homes Limited that is part of the Airfield site. As such, no connection can be made to this PROW without crossing (and relying on) land owned by Persimmon Homes Limited.

This link was not shown on the proposals submitted by Foreman Homes' as part of the planning application, but appears to have emerged as part of their recently submitted proof of evidence. I trust this explains the lateness of this submission, and I would hope this chronology of events provides justification for the Inspector to consider this Statement as part of the appeal.

The appellant's evidence (see for example, Landscape Proof, Paragraph 114) makes reference to 'permissive' walking routes across the Persimmon Homes land. This description is strongly contested; Persimmon does not permit any public use of the site (other than along the correct alignment of the PROW) but is aware that parties have sought to use the airfield despite signage being erected prohibiting this use. The Definitive Rights of Way Map clearly shows that no PROW exist other than the one marked "1".

Notwithstanding Persimmon's overriding concerns regarding the lack of a connection between the appeal site and PROW, there should also be no assumption that the unauthorised walking routes within the Airfield site should be relied upon for the purposes of determining the appeal. This issue was addressed by the previous appeal Inspector (PINS Ref: 3194846) at Paragraph 40 of his 2018 Decision Report (attached, DOCUMENT 4). I have extracted the relevant section of this Report below for ease of reference.

'40. I am conscious that there is an informal walking route across the former airfield, leading indirectly to the school and other facilities. However I place no reliance on this route as it does not appear to be legally established and its continuation is therefore uncertain. This route, leaving aside its legality, is unsurfaced and unlit, and is therefore unattractive and unwelcoming in inclement weather and certainly during the hours of darkness.'

The situation has not changed since this appeal decision was made and reliance cannot be placed on Persimmon Homes Limited land for the delivery of connections to local amenities.

Given that Foreman's application was refused (in part) due to poor accessibility to key services and facilities it is important that the Inspector has clarity on the factual position regarding connections (or lack thereof) through Persimmon land. Persimmon Homes Limited have not been approached by anyone from Foreman Homes regarding this connection. Any proposals for a connection through the Airfield site, and in accordance with the previous appeal decision, Persimmon Homes Limited request that no reliance is placed upon any potential link between its site and the appellant's appeal site to overcome connectivity issues cited in the reason for refusal.

On Behalf of Persimmon Homes Limited

Mr Daniel Ramirez BSc MSc MRTPI