

Core Documents List

New Inquiry Core Documents List (Documents/Plans submitted from 16/07/2024 to present)

Land at Midhurst Road, Haslemere, Surrey (Scotland Park Phase 2)

LPA REF: WA/2022/01887

APPEAL REF: APP/R3650/W/23/3327643

Last updated: V19 14/05/2025

Core Documents List

NID Number	Document Title	Date	Author	Comments
NID1 Legal Challenge				
1.1	Consent Order	16/07/2024	High Court Decision	
1.2	Pre-Action Protocol Letter Before Claim	07/06/2024	Clarke Willmott	
1.3	Letter to PINS	31/05/2024	Savills	
1.4	Response from Secretary of State to Pre-Action Protocol Letter	21//06/2024	DLUHC	
1.5	Response from WBC	25/06/2024	WBC	
1.6	Redwood Statement of Facts and Grounds	26/06/2024	Redwood South West Ltd.	
NID2 Further Statutory Consultee Representations / Submissions				
2.1	Thames Water Capacity Update	18/09/2024	Thames Water	
2.2	Surrey Hills National Landscape Board	30/11/2024	Surrey Hills National Landscape (SHNL) Board	
2.3	Natural England	04/12/2024	Natural England	
2.4	Haslemere Scouts	12/12/2024	Haslemere Scouts	
2.5	Environment Agency	14/11/2024	Environment Agency	
NID3 Other Appeal Documents				
3.1	Rule 6 Status Application by HSRA	n.d.	Haslemere South Residents Association (HSRA)	
3.2	Case Management Conference (CMC) Agenda	20/12/2024	PINS	
3.3	Position Statement of the Appellant to inform the Pre-Inquiry Meeting	20/12/2024	Redwood South West Limited	
3.4	Rule 6 Statement of Case	20/12/2024	HSRA	Version 2
3.5	Position Statement of WBC to inform the Pre-Inquiry Meeting	3/1/2024	WBC	
3.6	Rule 6 Amended Statement of Case	5/1/2024	HSRA	Version 3
3.7	Revised CMC Summary Note	7/1/2025	PINS	
3.8	Previous Inspector's Decision	24/05/2024	PINS	
3.9	Andrew Griffith MP Public Response	30/12/2024		

Core Documents List

3.10	Confirmation of Tree Protection Order (TPO) 20/24 Notice	14/02/2025	WBC	
NID4 Statements of Common Ground (SoCG)				
4.1	Housing Land Supply SoCG Final and WBC 5YHLS Statement (2 parts)	29/01/2025	WBC / Neame Sutton	
4.2	Draft Landscape SoCG (Appellant Version)	11/02/2025	Fabrik	Superseded by NID4.4
4.3	Draft Planning SoCG (Appellant Version)	11/02/2025	Savills	Superseded by NID4.5
4.4	Draft Landscape SoCG V2	21/02/2025	Fabrik / WBC	Superseded by NID4.6
4.5	Draft Planning SoCG V2	26/02/2025	Savills / WBC	Superseded by NID4.7
4.6	Draft Landscape SoCG V3	28/02/2025	Fabrik / WBC	Superseded by NID4.9
4.7	Draft Planning SoCG V3	28/02/2025	Savills / WBC	Superseded by NID4.8
4.8	Draft Planning SoCG V4	03/03/2025	Savills / WBC	Superseded by NID4.11
4.9	Draft Landscape SoCG V4	03/03/2025	Fabrik / WBC	Superseded by NID4.10
4.10	Landscape SoCG Final	04/03/2025	Fabrik / WBC	
4.11	Planning SoCG Final	04/03/2025	Savills / WBC	
NID5 Proofs of Evidence				
5.1	Mr Collins Planning Proof of Evidence	11/03/2025	Savills	
5.2	Mr Jack Ecology Proof of Evidence	11/03/2025	EPR	
5.3	Mr Smith Landscape Proof of Evidence	11/03/2025	Fabrik	
5.4	Mr Pullan Design Proof of Evidence	11/03/2025	Pegasus	
WBC				
5.5	Mr Johnson Planning Proof of Evidence	11/03/2025	Luken Beck	
5.6	Mr Johnson Planning Proof of Evidence Summary	11/03/2025	Luken Beck	
5.7	Mr Petrow Landscape Proof of Evidence	11/03/2025	Petrow Harley Ltd	
R6P				
5.8	Mr Harrison Landscape Proof of Evidence	11/03/2025	R6 Party	
5.9	Ms Moses Biodiversity and Ecology Proof of Evidence	11/03/2025	R6 Party	Includes ecology report prepared by GS Ecology
NID6 Opening and Closing Statements				
6.1	Appellant Opening Statement	08/04/2025	Redwood South West Limited	
6.2	Council Opening Statement	08/04/2025	WBC	
6.3	Rule 6 Party Opening Statement	08/04/2025	R6 Party	
6.4	Appellant Closing Statement	06/05/2025	Redwood South West Limited	
6.5	Council Closing Statement	06/05/2025	WBC	
6.6	Rule 6 Party Closing Statement	06/05/2025	R6 Party	
NID7 Other Relevant Guidance and Documents				

Core Documents List

7.1	Written Ministerial Statement – Secretary of State Angela Rayner	30/07/2024	MHCLG	
7.2	The Secretary of State’s Statement in Parliament	30/07/2024	MHCLG	
7.3	Chief Planner’s letter to Local Planning Authorities	2/08/2024	MHCLG	
7.4	NPPF Consultation Response Document	12/12/2024	MHCLG	
7.5	Statement in Parliament – Matthew Pennycook	12/12/2024	MHCLG	
7.6	Written Ministerial Statement – Matthew Pennycook	12/12/2024	MHCLG	
7.7	Message from the Chief Planner	13/12/2024	MHCLG	
7.8	Prime Minister’s Speech on Plan for Change	5/12/2024	Prime Minister's Office	
7.9	The King’s Speech 2024	17/07/2024	His Majesty King Charles III	
7.10	WBC 5YHLS Position Statement	11/2024	WBC	
7.11	DEFRA Guidance for relevant authorities on seeking to further the purposes of Protected Landscape	16/12/2024	Department for Environment, Food & Rural Affairs (DEFRA)	
7.12	Lichfields Start to Finish	03/2024	Lichfields	(Third Edition)
7.13	Council Meeting Committee Report and Minutes	21/02/2023	WBC	
7.14	Council Meeting Committee Report and Minutes	18/07/2023	WBC	Includes 2 Appendices
7.15	WBC Local Development Scheme	12/2023	WBC	
7.16	Q3 2022-23 Corporate Performance Report	02/03/2023	WBC	
7.17	Q4 2023-24 Corporate Performance Report	07/06/2024	WBC	
7.18	WBC Leader of the Council Letter to Deputy Prime Minister	19/09/2024	WBC	
7.19	Secretary of State Decision for Land Adjacent to Turnden	22/11/2024	MHCLG	
7.20	The Surrey Hills Environmental Design Guide	14/11/2019	Surrey Hills National Landscape Board (formerly AONB)	
7.21	National Planning Policy Guidance (NPPG) – Design: process and tools	1/10/2019	MHCLG	
7.22	Land off Scotland Lane, Scotland Lane, Haslemere (WA/2020/1213) Officer’s Committee Report and Late Sheet	07/2021	WBC	
7.23	Building Design into the Surrey Hills: Guidance on the preparation of Design Statements for new development	08/2004	Surrey Hills National Landscape Board (formerly AONB)	

Core Documents List

7.24	WBC Landscape Study – Part 2: Haslemere & Godalming	08/2014	WBC / AMEC Environment & Infrastructure UK Limited	
7.25	R (Kinnersley) v Maidstone BC [2023] EWCA Civ 172	22/02/2023	Court of Appeal	
7.26	WBC Corporate Strategy 2024-2028	10/2024	WBC	
7.27	WBC Homelessness Strategy 2023-2028	12/2023	WBC	
7.28	New draft National Planning Policy Framework – implications for Waverley	09/2024	Iceni	
7.29	WBC's response to the NPPF Consultation	09/2024	WBC	
7.30	Five Year Housing Land Supply Statement	01/2025	WBC	
7.31	House of Lords Built Environment Committee inquiry into the Grey Belt Evidence on behalf of WBC	21/10/2024	WBC	
7.32	Land West of London Lane, Ascott under Wychwood, Oxfordshire, (APP/D/3125/W/23/3332089)	03/05/2024	PINS	
7.33	Hunston Properties Ltd v Secretary of State for Communities and Local Government [2013] EWHC Civ 1610	12/12/2013	High Court	
7.34	Land at Chichele Road, Oxted, RH8 0NZ, (APP/M3645/W/24/3345915)	11/12/2024	PINS	
7.35	Land south of Newhouse Farm, Old Crawley Road, Horsham, (APP/Z3825/W/21/3266503)	30/07/2021	PINS	
7.36	North Wiltshire DC v Secretary of State for the Environment (1993) 65 P. & C.R. 137	12/04/1992	Court of Appeal	
7.37	R (on the application of Matthew Davison) v Elmbridge Borough Council [2019] EWHC 1409	02/05/2019	High Court	
7.38	R (on the application of Paul Havard) v South Kesteven District Council [2006] EWHC 1371	06/04/2006	High Court	
7.39	St Modwen Developments Ltd v Secretary of State for Communities and Local Government [2017] EWCA Civ 1643	20/10/2017	Court of Appeal	
7.40	Land at Sondes Place Farm, Westcott Road, Dorking (APP/C3620/W/23/3324631)	28/11/2023	PINS	
7.41	Land South of Shenley Road, Radlett, WD7 7BP (APP/N1920/W/23/3320599)	26/01/2024	PINS	
7.42	Land lying to the east of Hartfield Avenue and fronting on to Barnet Lane, Elstree, Hertfordshire (APP/N1920/W/23/3329947)	25/03/2024	PINS	
7.43	Land at Coombebury Cottage, Dunsfold Common Road, Dunsfold (APP/R3650/W/23/3332590)	08/05/2024	PINS	

Core Documents List

7.44	Land west of Hedgehog Lane, Hedgehog Lane, Haslemere GU27 2PH (APP/R3650/W/22/3295573)	01/06/2023	PINS	
7.45	HTC Application Response to Land West of Hedgehog Lane, Haslemere (WA/2024/02460)	07/02/2025	HTC	
7.46	PINS emails in relation to the First Appeal Decision	02/08/2024	PINS	
7.47	WBC Local Development Scheme	03/2025	WBC	
7.48	HTC Planning & Highways Committee Signed Minutes	06/02/2025	HTC	
7.49	Weston Homes Plc, R (On the Application Of) v Secretary of State for Levelling Up, Housing and Communities & Anor [2024] EWHC 2089 (Admin)	07/08/2024	High Court	
NID8 Inquiry Documents				
8.1	New Forest National Park Authority v Secretary of State for Housing, Communities and Local Government & Mr Simon Lillington [2025] EWHC 726 (Admin)	27/03/2025	High Court	
8.2	Land West of Hedgehog Lane, Haslemere (WA/2024/02460) Officer's Report	1/04/2025	WBC	
8.3	Protected Landscapes Targets and Outcomes Framework	31/01/2024	DEFRA	
8.4	Rule 6 Declarations Biodiversity, Ecology, Landscape	20/03/2025	R6 Party	
8.5	Tree Retention and Removal Plan Sheet 1 of 2 and 2 of 2	03/2025	Fabrik	Drawing No. 6046 / PL 03A Supersedes CD1.33.
NID9 Public Responses (Alphabetical Order)				
9.1	Public responses A-B	12/2024		Public Responses Received in Relation to Re-determination Appeal in December 2024
9.2	Public responses C-D	12/2024		
9.3	Public responses E-G	12/2024		
9.4	Public responses H-I	12/2024		
9.5	Public responses J-L	12/2024		
9.6	Public responses M-N	12/2024		
9.7	Public responses O-R	12/2024		
9.8	Public responses S-T	12/2024		
9.9	Public responses U-Z	12/2024		

Core Documents List

NID10 Public Responses from Previous Appeal (Alphabetical Order)				
10.1	Public responses A-B	11/2023		All Public Correspondence is from Previous Appeal received in October 2023.
10.2	Public responses C-D	11/2023		
10.3	Public responses E-F	11/2023		
10.4	Public responses G	11/2023		
10.5	Public responses H-I	11/2023		
10.6	Public responses J-L	11/2023		
10.7	Public responses M-N	11/2023		
10.8	Public responses O-R	11/2023		
10.9	Public responses S-T	11/2023		
10.10	Public responses U-Z	11/2023		
NID11 Rebuttals				
11.1	Mr Collins Planning Rebuttal	25/03/2025	Savills	
11.2	Mr Jack Ecology Rebuttal	25/03/2025	EPR	
NID12 S106 Planning Obligation, Planning Conditions and CIL Compliance				
12.1	Draft Schedule of Conditions (Appellant Version)	11/02/2025	Redwood South West Limited	
12.2	Draft Schedule of Conditions (Appellant & LPA Version)	03/03/2025	Redwood South West Limited / WBC	
12.3	Draft Schedule of Conditions V3 (Appellant & LPA Version)	01/04/2025	Redwood South West Limited / WBC	
12.4	Agreed Schedule of Conditions V4 (Appellant & LPA Version)	23/04/2025	Redwood South West Limited / WBC	
12.5	Final Section 106 Agreement – Council	02/05/2025	Redwood South West Limited / WBC	Includes appendices. Not signed.
12.6	Agreed CIL Compliance Statement	06/05/2025	Redwood South West Limited / WBC	
12.7	Summary Note Regarding Council Level Obligations	14/04/2025	Clarke Willmott	
12.8	R122 Note Regarding County Level Obligations	14/04/2025	Clarke Willmott	

Core Documents List

12.9	Council S106 Monitoring Fee Table Rational	17/04/2025	WBC	
12.10	Final Section 106 Agreement – Council (Signed)	12/05/2025	Redwood South West Limited / WBC	
NID13 Documents Shared at Inquiry				
13.1	Clive Smith Surrey Hills Landscape Adviser Response	11/03/2025	National Landscape Unit	
13.2	Mr Pullan Inquiry Presentation	08/04/2025	Pegasus	
13.3	Mr Weldon Inquiry Statement	08/04/2025		
13.4	Mr Bradford Inquiry Statement	08/04/2025		
13.5	Mr Coombes Inquiry Statement	08/04/2025		
13.6	Ms Ahern Inquiry Statement	08/04/2025		
13.7	Mr Page Inquiry Statement	08/04/2025		
13.8	Ms Peters Inquiry Statement	08/04/2025		
13.9	Ms Hamilton Inquiry Statement	08/04/2025		
13.10	Ms Brown Inquiry Statement	08/04/2025		
13.11	Mr A Page Inquiry Statement	08/04/2025		
13.12	Land at Scotland Park Public Exhibition Boards	2019	Pegasus	
13.13	Land at Scotland Park Vision Statement for Public Exhibition	05/2019	Adam Architecture	
13.14	Ms Devlin Inquiry Statement	08/04/2025		
13.15	Mr Pullan Presentation Speaking Notes	08/04/2025	Pegasus	
13.16	Ms Strachan Inquiry Statement	09/04/2025		
13.17	National Planning Policy Guidance (NPPG) – Natural Environment Extracts	2019/2025	MHCLG	
13.18	Photo of the Appeal Site from Howard Brown	10/04/2025	R6 Party	Introduced in Mr Harrison's evidence.
13.19	Thames Water Response to R6 Party	09/04/2025	Thames Water	
13.20	Correspondence between EPR and Natural England	07/04/2025	Natural England / EPR	
13.21	Grayswood Forest School Inquiry Statement	07/04/2025	Grayswood Forest School	
13.22	R6 Party Statement on Water Interruptions	14/04/2025	R6 Party	
13.23	Ecology Statement of Common Ground	14/04/2025	R6 Party	
13.24	The Old Grove (WA/2021/02876) Officer's Report	14/04/2025	WBC	
13.25	Waverley Landscape Designations Map	23/04/2025	Fabrik	
13.26	Frack Free Balcombe Residents' Association v Secretary of State for Housing Communities and Local Government and Angus Energy Weald Basin No.3	16/04/2025	Court of Appeal	

Core Documents List

	Limited and West Sussex County Council [2025] EWCA Civ 495			
13.27	Mr Clark Written Statement	23/04/2025		
13.28	1st Haslemere Scout Group and Scout Hall Lease Letter	17/04/2025	1st Haslemere Scout Group	
13.29	Letter from DAC Beachcroft on behalf of WBC regarding Scout Hall at Bunch Lane, Haslemere	30/04/2025	DAC Beachcroft / WBC	
13.30	R. (on the application of Samuel Smith Old Brewery (Tadcaster)) v Secretary of State for Communities and Local Government [2009] EWHC 3238	26/11/2009	High Court	
13.31	Kingswood District Council v Secretary of State for the Environment and Another [1987] EWHC 2	15/07/1987	High Court	
13.32	R. (on the application of The Forge Field Society, Barraud and Rees) v Sevenoaks DC, West Kent Housing Assoc and The Right Honourable Viscount De L'Isle [2014] EWHC 1895	15/06/2014	High Court	
13.33	Town and Country Planning Act 1990 c. 8 s. 288 Proceedings for questioning the validity of other orders, decisions and directions.	01/03/2016		
13.34	Vision Transport's Response to Mr Clark's Written Statement	02/05/2025	Vision Transport Planning	
13.35	Ecology Evidence Chronology	02/05/2025	EPR / R6 Party	

END