

Core Documents List - APPEAL REF: 6004972

Core reference	Document name / reference	Relevant Section Reference / Paragraph	Explanation to relevance to case
CD1	Application Plans and Documents		
1.1	Application form (19/12/24)		
1.2	Covering letter (RPS, 19/12/24)		
1.3	Location plan (17/01/25) (P24-1200-DE_001)		
1.4	Land use parameter plan (06/01/26) (P24-1200-DE-0014-S1-Rev F)		
1.5	Indicative building heights (06/01/26) (P24-1200-DE-0016-S1-Rev B)		
1.6	Indicative placemaking (06/01/26) (P24-1200-DE-0024-S1)		
1.7	Indicative street hierarchy (06/01/26) (P24-1200-DE-0023-S1)		
1.8	Proposed Site Access Durrants Drive (09.06.2025) (T24544.001 Rev E)		
1.9	Proposed Site Access Links Way (17.12.2024) (T24544.002 Rev D)		
1.10	Proposed Site Access Shared Footway / Cycleway (17.12.2024) (T24544.003 Rev F)		
1.11	Proposed Site Access Shared Footway / Cycleway (09.06.2025) (T24544.004 Rev B)		
1.12	Potential Parking Provision (09.06.2025) (T24544.005 Rev C)		
1.13	Ecological biodiversity impact assessment (24/12/24)		
1.14	Education Report (EFM, December 2024)		
1.15	Energy Statement (Greengage, December 2024)		
1.16	Flood Risk Assessment (BWB, December 2024, 233574_FRA)		
1.17	Health Impact Assessment (RPS, December 2024, 1.0)		
1.18	Air Quality Assessment (BWB, December 2024, 233574-01-AQA)		
1.19	Sustainable Drainage Strategy (BWB, December 2024, 233574-SDS)		
1.20	Utilities Statement (BWB, December 2024, 233574)		

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1.21	Agricultural land classification and soil resources report (24/12/24)		
1.22	Sustainable Drainage Strategy (BWB, December 2024, 233574-SDS)		
1.23	Heritage Statement (Pegasus Group, December 2024, P24-1200)		
1.24	Landscape and Visual Impact Assessment (iceni, December 2024)		
1.25	Green Belt Addendum Assessment (Iceni, March 2025).		
1.26	Noise Impact Assessment (BWB, December 2024, 233574_002)		
1.27	Sports and Leisure Strategy (Sports Planning Consultants, December 2024)		
1.28	Planning Statement (RPS, December 2024)		
1.29	Planning Statement Addendum (RPS October 2025). Including (2) 'Planning Policy Changes and Implications' such as the Sarratt Neighbourhood Plan and (3) Response to themes and matters raised at the preliminary Planning Committee, by consultees and public consultation.		
1.30	Phase 1 GEO-Environmental Assessment (BWB, December 2024, 233574)		
1.31	Amended Transport Assessment and Appendices (hub Transport Planning Ltd, Rev C 3/7/25).		
1.32	Amended Transport Assessment and Appendices (hub Transport Planning Ltd, Rev E 23/10/25).		
1.33	Stage 1 Road Safety Audit Report (hub Transport Planning Ltd, July 2025).		
1.34	Amend Travel Plan (hub Transport Planning Ltd, 26/6/2024) (NB. The agent has confirmed that the amended travel plan received July 2025 should be dated 26/6/2025).		
1.35	Active Travel Route Audit (hub Transport Planning Ltd, 2/7/25).		
1.36	Response to TRDC Stage 4 Green Belt Review (iceni, September 2025).		
1.37	Addendum to M1 J5 Vissim model tests report (16/12/25)		
1.38	Affordable Housing Statement (Tetlow King Planning, December 2024, M24/0511 01.RPT)		
1.39	Updated Affordable Housing Position Statement (Email from RPS, 15/12/2025).		
1.40	Amended design and access statement and design code part 1 of 2 (24/10/25) (Revision C, October 2025)		

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1.41	Amended design and access statement and design code part 2 of 2 (24/10/25) (Revision C, October 2025)		
1.42	Amended Landscape Strategy (iceni, ref. DL02 G – previously Appendix 11 of LVIA).		
1.43	Amended Preliminary Arboricultural Impact Assessment (Tyler Grange, 11702_R02_NC, 9 October 2025)		
1.44	Woodland Recreational Management Plan (Outline), ref. RSE_8239_R2_V2 October 2025.		
1.45	Biodiversity checklist (24/12/24)		
1.46	Biodiversity Calculation Metric (24/12/24)		
1.47	Local Centre Capacity Statement (Lambert Smith Hampton, December 2024)		
1.48	Technical Note TN3 – All Modes Travel Demand (hub Transport Planning Ltd, 1/9/25).		
1.49	Technical Note TN2 – Impact on the SRN (hub Transport Planning Ltd, 18/8/25).		
1.50	TRDC 5 Year Housing Land Supply Assessment (Emery Planning, December 2024, 24-305)		
1.51	Statement of Community Involvement (Cratus Group, December 2024)		
1.52	Sustainability Statement (Greengage, December 2024)		
1.53	Transport Assessment Addendum (hub Transport Planning Ltd, 10/12/2025).		
1.54	M1 J5 Vissim Model Tests (WSP, 13/11/2025)		
1.55	HCC Highways Notice Letter (RPS, 16/01/2025)		
Core reference	Document name / reference	Relevant Section Reference / Paragraph	Explanation to relevance to case
CD2	Applicant Responses		
2.1	Response to TRDC Heritage Officer comments (Pegasus Group 27/03/25 received 28/03/25).		

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2.2	Response to Lead Local Flood Authority comments (BWB Ref. 233574-BWB-ZZ XX-T-W-0005_LLFA received 07/05/25).		
2.3	Applicant response to Herts Ecology (17/02/25)		
2.4	Response to Sport England comments (RPS 22/05/25).		
2.5	Green belt purpose A note. Response to TRDC Stage 4 Green Belt Review (iceni, September 2025).		Following discussion with Officers and initial consideration that the Site contributed strongly to Purpose A
Core reference	Document name / reference	Relevant Section Reference / Paragraph	Explanation to relevance to case
CD3	Consultee Comments		
3.1	Check list from HCC Flood Risk Management Team (07/02/25)		
3.2	Comment from HCC Flood Risk Management Team		
3.3	Comment 2 from HCC Flood Risk Management Team		
3.4	Comment from Transport for London		
3.5	Comment 2 from Transport for London		
3.6	Comment 3 from Transport for London		
3.7	Comment 4 from Transport for London		
3.8	Comment from National Highways		
3.9	Comment 2 from National Highways		
3.10	Comment 3 from National Highways		
3.11	Comment 4 from National Highways		
3.12	Comment 5 from National Highways		
3.13	Comment 6 from National Highways		
3.14	Comment 7 from National Highways		
3.15	Comment from Forestry Commission		
3.16	Comment 2 from Forestry Commission		
3.17	Comment 3 from Forestry Commission		

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3.18	Comment 4 from Forestry Commission		
3.19	Comment 4 from Forestry Commission – Attachment		
3.20	Comment from Hertfordshire County Highways (07/01/26)		
3.21	Comment 2 from Herts Highways (07/01/26)		
3.22	Comment 3 from Herts Highways (07/01/26)		
3.23	Comment from Sport England (12/03/26)		
3.24	Comment 2 from Sport England (28/05/26)		
3.25	Comment from Croxley Green Parish Council (21/02/25)		
3.26	Comment 2 from Croxley Green Parish Council re planning addendum (14/11/25)		
3.27	Comment from Active Travel England (11/02/25)		
3.28	Comment 2 from Active Travel England (28/07/25)		
3.29	Comment from The Woodland Trust (18/02/25)		
3.30	Comment 2 from Woodland Trust (13/11/25)		
3.31	Comment from Trees and Landscapes Officer (02/04/25)		
3.32	Comment 2 from Trees and Landscape Officer (04/11/25)		
3.33	Comment from Housing Strategy and Development Manager (23/01/25)		
3.34	Comment 2 from Housing (16/12/25)		
3.35	Comment from Herts and Essex ICB (18/02/25)		
3.36	Comment 2 from Hertfordshire and West Essex Integrated Care System (15/12/25)		
3.37	Comment form TRDC Local Plans (24/02/25)		
3.38	Comment 2 from Local Plans (16/12/25)		
3.39	Comment from Environmental Protection (20/02/25)		
3.40	Comment from Conservation Officer (21/02/25)		
3.41	Comment from Herts Ecology (10/02/25)		
3.42	Comment 2 from Herts Ecology (27/02/25)		
3.43	Comment from Natural England (05/02/25)		

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3.44	Comment from Affinity Water (13/03/25)		
3.45	Comment from British Pipeline Agency Ltd (28/01/25)		
3.46	Comment from Chilterns Conservation Board (21/07/25)		
3.47	Comment from Chilterns Conservation Board (21/10/25)		
3.48	Comment from Growth and Infrastructure (14/02/25)		
3.49	Comment 2 from HCC GIU (07/08/25)		
3.50	Comment 3 from HCC GIU (13/11/25)		
3.51	Comment 4 from HCC GIU (22/01/26)		
3.52	Comment from Fire Officer (18/07/25)		
3.53	Comment from HCC Minerals and Waste Policy Team (22/01/25)		
3.54	Comment from Hertfordshire County Council Highways (07/01/26)		
3.55	Comment from Hertfordshire Healthy Places (23/07/25)		
3.56	Comment from Herts Archaeology (27/01/25)		
3.57	Comment from Herts Constabulary Crime Prevention (28/07/25)		
3.58	Comment from Herts Constabulary Crime Prevention (22/09/25)		
3.59	Comment from London Underground (26/02/25)		
3.60	Comment from National Grid (22/07/25)		
3.61	Comment from Sarratt Parish Council (21/02/25)		
3.62	Comment from Thames Water (03/02/25)		
3.63	Comment from The Ramblers (25/01/25)		
3.64	Comment from Three Rivers Leisure Department (10/02/25)		
3.65	Comment from Watford Environmental Health Team (11/02/25)		
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CD4	Decision and Council Response		

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4.1	TRDC July 2025 Preliminary Committee Report (17 July 2025)		
4.2	TRDC Decision notice (16/01/26)		
4.3	TRDC January 2026 Committee Report (22/01/26)		
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CD5	Relevant Appeal Decisions		
5.1	Appeal Ref: APP/C3620/W/23/3324631 Land at Sondes Place Farm, Westcott Road, Dorking (28 November 2023)	p.16 [85-86]	Inspector endorsed the use of the Sedgefield approach to clear a previous backlog of affordable housing delivery.
5.2	Appeal Ref: APP/M2270/W/21/3282908 Land to the East of Highgate Hill and South of Cophall Avenue, Hawkhurst, Kent (22 March 2022)	p.23 [118]	Considers the benefits of development, notably affordable housing.
5.3	Appeal A Ref: APP/P1940/W/22/3311477 Land rear of 17-49 Church Lane, Sarratt & Appeal B Ref: APP/P1940/W/22/3311479 Land adjacent to 97 Church Lane Sarratt. Dated: 10 June 2026	p. 18 [79-81], 21 [95]	Inspectors weight to affordable housing in the planning balance.
5.4	Appeal Ref: SoS APP/P1940/W/24/3346061 – Bedmond Road. Dated 12 May 2025.	Paragraph 35	SoS position on appropriateness of development in the context of national greenbelt policy and local policy
5.5	Appeal Ref: APP/P1940/W/25/3370028 - Little Green Street Farm, Chorleywood. Dated 2 December 2025.	Paragraph 14	Example of accordance of policy where development fell within a relevant Green Belt exception and was not inappropriate development
5.6	Appeal Ref: APP/W3520/W/18/3194926. Land on East Side of Green Road, Woolpit, Suffolk. Dated 28 September 2018		
5.7	Appeal Ref: APP/Y0435/W/17/3169314. LAND TO THE EAST OF NEWPORT ROAD AND TO THE EAST AND WEST OF CRANFIELD ROAD, WOBURN SANDS, BUCKINGHAMSHIRE. Dated 25 June 2020		
5.8	Appeal Ref: APP/C3105/W/24/3355576 Land west of Fringford Road, Caversfield. Dated: 16 December 2025.		
5.9	Appeal Ref: APP/A0665/W/14/2212671. LAND OFF DARNHALL SCHOOL LANE, WINSFORD, CHESHIRE. Dated 4 November 2019.		

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5.10	Appeal Ref: APP/V4630/W/25/3369937 Land West of Longwood Lane, Walsall. Dated 11 February 2026		
5.11	Appeal Ref: APP/P0119/W/24/3357956 Land south of Hencliffe Way and west of Castle Farm Road, Hanham. Dated 4 July 2025.		
5.12	Appeal Ref: APP/M1710/W/23/3329928 Mount Royal, 46 Lymington Bottom, Four Marks, Alton, Hampshire. Dated 10 April 2024.		
Core reference	Document name / reference	Relevant Section Reference / Paragraph	Explanation to relevance to case
CD6	Relevant Judgements		
6.1	City of Edinburgh Council v Secretary of State for Scotland [1997] 1 WLR 1447	p.3	Confirmed the primacy of the development plan while recognising that policies must be interpreted and applied in context
6.2	R v Rochdale MBC ex parte Milne [2000] EWHC 650	p.15 [46]	Confirms the notion that a proposal does not need to comply with every relevant policy in order to be in accordance with the development plan as a whole
6.3	Lindblom LJ in Hallam Land vs SSCLG	p. 16 [51]	Exposition of the operation of the tilted balance in circumstances where there is a five-year housing land supply deficit
6.4	Suffolk Coastal District Council v Hopkins Homes Ltd [2017] UKSC 37)	p. 83	Outlines the precedent for reduced weight of settlement boundary policies in the face of out-of-date supporting policy
Core reference	Document name / reference	Relevant Section Reference / Paragraph	Explanation to relevance to case
CD7	Other Supporting Information		
7.1	Three Rivers Core Strategy (adopted 2011) (2001-2026)		The Core Strategy sets out the TRDC strategy for delivering new homes, jobs and infrastructure over the 25-year plan period from 2001/02 to 2025/26.

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7.2	Three Rivers Development Management Policies Local Development Document (2013)		The Development Management Policies LDD sets out the criteria against which all planning applications within TRDC are considered.
7.3	Matthew Pennycook MP TRDC Local Plan Intervention Letter (18 March 2026)		On 18 March 2026, the Minister of State for Planning and Housing issued a total of nine directions to TRDC including modifications to lift the housing requirement to approximately 85% of need, and to review and update the draft plan and evidence base in readiness for Regulation 19 consultation and Submission.
7.4	Sarratt Neighbourhood Plan (2025)		The appeal site falls within the designated area for the Sarratt Neighbourhood Development Plan.
7.5	Three Rivers Affordable Housing Supplementary Planning Document (2011)	Paragraphs 1.1, 1.2, 3.11, 3.21, 4.5, 4.8	Provides guidance on the application of Core Strategy Policy CP4 'Affordable Housing'.
7.6	Three Rivers Council Plan 2026 – 2029	Pages 3, 6, 7, 14, 17	Sets out TRDC's corporate goals for the district between 2026 and 2029.
7.7	Three Rivers Housing, Homelessness and Rough Sleeping Strategy 2023 – 2028	Pages 4, 5, 11, 16.	Sets out the key issues, challenges and priorities related to the delivery of housing-related services in the district over a five-year period.
7.8	Three Rivers Temporary Accommodation Placement Policy (December 2018, reviewed May 2024)	Paragraphs 2.2, 2.3	Details how TRDC places customers in temporary accommodation within and beyond Three Rivers District.
7.9	London Commuter Belt (West) Sub-Region Strategic Housing Market Assessment (2008) (published 2010)	Figure 156	The 2008 SHMA forms part of the housing evidence base for the adopted Three Rivers Core Strategy (2011), identifying housing needs for Three Rivers District between 2007/08 and 2020/21.
7.10	South West Herts Local Housing Needs Assessment Update (2024)	Section 7 – Affordable Housing Needs [Figures 7.10 and 7.43]	The 2024 LHNA currently provides the most up to date assessment of housing need in Three Rivers District. It was commissioned to assess future development needs for housing across South West Hertfordshire over the 2021-2041 period to help inform strategic and local planning activities, including the production of the Three Rivers Emerging Local Plan.

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7.11	TRDC Housing Land Supply Update (April 2026)	Chapter 3 – section 3.6	TRCD can demonstrate a 1.185 yr supply of deliverable housing over the 2025/26 to 2029/30 five year period.
7.12	“Social and Affordable Housing Renewal” Written Ministerial Statement (2 July 2025)		Registered Providers ability to deliver affordable housing and to invest in affordable homes delivered through Section 106 planning obligations.
7.13	“Building the Homes We Need” Written Ministerial Statement (30 July 2024)		Indicates the Government’s ‘direction of travel’ for national planning policy.
7.14	“Building the Homes We Need” Written Ministerial Statement (12 December 2024)		Government objective to deliver 1.5 million homes during the current Parliament and a series of observations in respect of housing costs, the use of temporary accommodation, and insufficient new housing coming forward.
7.15	“Further Support for Social and Affordable Housebuilding and Next Steps on Supported Housing” Written Ministerial Statement (12 February 2025)		References the scale of the housing crisis, but places specific emphasis on affordable housing.
7.16	House of Commons Debate (24 October 2013)		Discussion on planning and housing supply emphasising the pressing need for more housing, and in particular affordable housing across the country.
7.17	Bleak Houses: Tackling the Crisis of Family Homelessness in England (August 2019)	Page 10, 12, 18	Sets out that family homelessness in England today is primarily a result of structural factors, including the lack of affordable housing.
7.18	Denied the Right to a Safe Home – Exposing the Housing Emergency (May 2021)	Pages 5, 6, 9, 10, 12, 14, 15, 25, 29, 32, 33	Affirms that we will only end the housing emergency by building affordable, good quality social homes.
7.19	Unlocking Social Housing: How to fix the rules that are holding back building (April 2022)	Pages 3, 6, 7, 11, 12, 21	An affordable and secure home is a human need.
7.20	Ancient woodland, ancient trees and veteran trees: advice for making planning decisions		Guidance regarding how to assess applications on or near proposed development sites.
7.21	Three Rivers District Council & Watford Borough Council, Green Belt Review: Strategic Analysis (2017)		The review assesses Green Belt openness and purposes, providing evidence to test whether alleged openness harm is significant.

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7.22	Stage 2 Green Belt Assessment for Three Rivers District and Watford Borough (2019)		Provides site-specific evidence on Green Belt parcel performance and openness impacts, analysing refusal reasons as they relate to greenbelt harm
7.23	Stage 4 Green Belt Review (February 2026)		Provides up-to-date evidence on Green Belt, Grey Belt and fundamental importance, testing whether openness and policy harm are overstated
7.24	Pages from TRDC Annual Monitoring Report 2023-24		Provides evidence of housing delivery and shortfall, increasing the weight attached to housing need
7.25	TRDC Annual Monitoring Report 2023-24 (December 2024)		Provides evidence of housing delivery and shortfall, increasing the weight attached to housing need
7.26	Three Rivers District Council Brownfield Land Register		Provides evidence regarding available brownfield land, testing the appropriateness of an application for greenbelt development
7.27	National Planning Policy Framework (NPPF, December 2024)		
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CD8	Pre-Inquiry Actions		
8.1	Statement of Common Ground (7 th July 2026)		
8.2	S106 Statement of Common Ground (07.07.2026)		
8.3	Appellant Statement of Case (11.02.2026)		
8.4	Three Rivers District Council Statement of Case (05.05.2026)		
8.5	Croxley Green Parish Council Statement of Case (29.05.2026)		
8.6	INSPECTOR'S NOTE OF CASE MANAGEMENT CONFERENCE (CMC) HELD AT 2PM ON MONDAY 1 JUNE 2026		
8.7	Croxley Green Parish Council Rule 6 Party Withdrawal (24.06.2026)		
8.8	LPA Reason for Refusal 2 Withdrawal Letter (24.04.2026)		

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8.9	LPA Reason for Refusal 1 Withdrawal Letter (24.06.2026)		
8.10	Appellant's Planning Proof of Evidence (Cameron Austin-Fell – Tetra Tech)		
8.11	Appellant's Landscape Proof of Evidence (Silke Gruner – Icení)		
8.12	Appellant's 5YHLS Proof of Evidence (Stephen Harris – Emery Planning)		
8.13	Appellant's Self-Build and Custom Housebuilding Statement (Andy Moger – Tetlow King Planning) (to be read with 8.10)		
8.14	Appellant's Affordable Housing Proof of Evidence (Delivery) (James Stacey – Tetlow King Planning)		
8.15	Appellants' Arboriculture Proof of Evidence (Julian Forbes-Laird – FLAC)		
8.16	Appellant's Transport Proof of Evidence (James Parker – Ridge)		
8.17	Appellant's Mortgagee in Possession Proof of Evidence (moratorium period) (John Baird – Osborne Clarke)		
8.18	Appellant's Mortgagee in Possession Statement (valuation) (Giles Sutcliffe – Savills)		
8.19	Appellant's Mortgagee in Possession (affordable housing) Proof of Evidence (James Bullivent – Pioneer)		
8.20	Appellant's Mortgagee in Possession Proof of Evidence (regulatory framework) (Richard St John Williams – Addleshaw Goddard LLP)		
8.21	Statement of Common Ground (8 th May 2026)		
8.22	Appellant's Education Proof of Evidence (Matthew Kingham – Icení)		
8.23	LPA Planning Proof of Evidence (Liz Fitzgerald – Barker Parry)		
8.24	LPA MIP Proof of Evidence (Adam Ralton – Three Rivers District Council)		
8.25	LPA S106/MIP Proof of Evidence (Roy Pinnock – Dentons UK and Middle East LLP)		