

October 2020



Briefing

Public Inquiries

A campaigner's guide

Introduction

This briefing gives an introduction to **planning inquiries** in England. There are some helpful tips throughout the briefing and at the end of the document there is further information and advice on timetabling, examples of written evidence statements and general links.

Section 1 gives a brief overview of the process. **Section 2** outlines the different types of inquiry. **Section 3** discusses the different stages to Inquiries. **Section 4** explains how to get involved. **Section 5** elaborates on key parts of public inquiry procedure. **Sections 6** and **7** discuss the role of written and oral evidence and **Section 8** provides details on the final decision.

Section 1: What are Public Inquiries?

What is a Public Inquiry?

A public inquiry is a highly structured formal meeting overseen by a planning inspector, where evidence is presented and considered, witnesses are cross-examined, and a site visit is undertaken before a final decision on a development proposal is reached.

On a very basic level, a public inquiry leads to planning permission being approved or refused for development. Its purpose is to set the case both for and against a development proposal before an inspector, who eventually makes the final decision or makes a recommendation to the Secretary of State who has the final say in specific instances.

There are many forms of public inquiry, but in terms of town planning, public inquiries are reserved for consideration of complicated and contentious applications that have either been:

- a) refused and subsequently appealed by a developer for refusal or non-determination
- b) refused and subsequently appealed by a developer which is then “recovered” by the Secretary of State for Housing, Communities and Local Government (SoS) for their determination
- c) **or ‘called-in’** by the SoS **before** a local planning authority has made a decision. This may be because i) the planning authority took too long to issue a decision (‘non-determination’); ii) because the application conflicts with national policy/is a departure from a local plan (in some instances); or iii) the development is of national significance.

Whatever the reason, the inquiry process ensures such development proposals will be rigorously scrutinised and a decision issued by a planning inspector (criterion (a) above) – with the SoS deciding in instances (b) and (c).

A planning inspector will consider in detail a wide variety of planning policy documents, third-party submissions, proofs of evidence, previous decisions and will listen to expert witnesses for and against a development. Inquiries can last several days, although those lasting more than a week are less common.

Members of the public can attend and also speak at public inquiries (although only usually if they’ve previously objected to the application) – whether it’s a fracking site, housing development or industrial use. More often than not, you will probably be objecting but you might also be supporting good planning applications, such as sustainable housing or renewable energy projects.

The basic principle of planning inquiries is that despite being more adversarial than determination solely by written representations or written representations and hearing, all parties should be allowed a fair chance to put forward their point of view whether in writing, or at the inquiry itself. All evidence presented to the Inspector will be considered before he/she makes a decision in light of national policy, local plan policies and any other material considerations. Where the final decision is made by the Inspector, he or she will publish the decision in a report a few months after the inquiry has finished. Where the SoS decides, the

Inspector prepares their report (as per the above) and makes a recommendation for the Secretary of State to have the final say.

What is the Planning Inspectorate?

Planning Inspectors work for an organisation called the Planning Inspectorate (PINS). PINS is an Executive Agency which serves the Ministry for Communities, Housing and Local Government in England **and** the National Assembly in Wales. Scotland and Northern Ireland each have their own equivalent of the Planning Inspectorate: the Planning and Enforcement Appeals Division of the Scottish Government **and** the Planning Appeals Division in Northern Ireland, respectively.

What does the Inspectorate do?

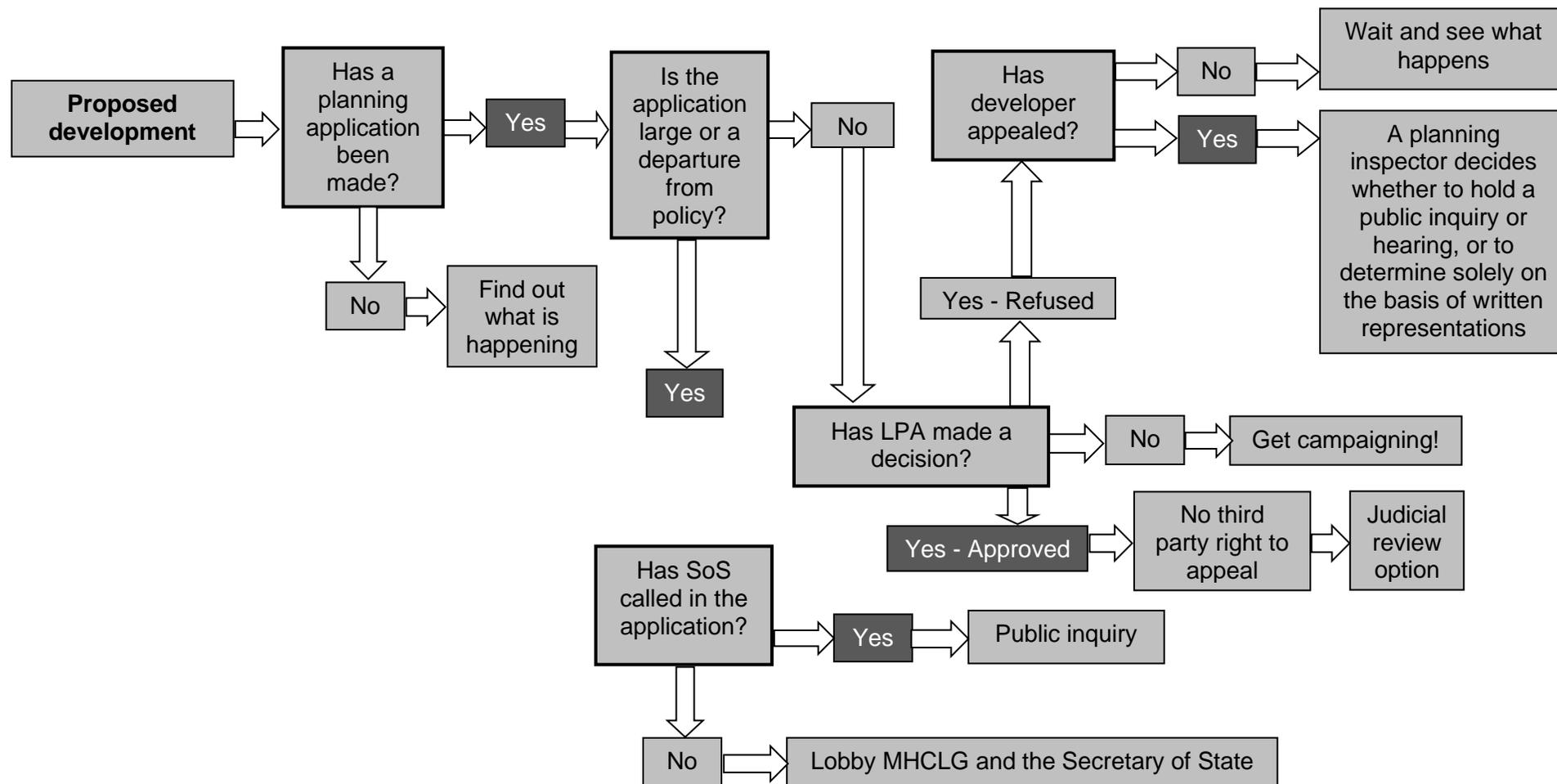
The principal work of PINS (or equivalent devolved inspectorate) involves the processing of planning application and enforcement appeals/non-determination and other call-ins **and** undertaking examination into strategic and local plans. In England, PINS also deals with a wide variety of other planning related casework, including applications for Development Consent Orders for Nationally Significant Infrastructure Projects (e.g. power stations, new runways etc); advertisement appeals; compulsory purchase orders; rights of way cases; cases arising from the Environmental Protection and Water Acts, the Transport and Works Act and other Highways Legislation. In addition, they also decide on applications for the awarding of costs which may arise from any of the above appeals.

How do public inquiries fit in with the rest of your campaign against a development?

There is absolutely NO substitute for a well organised and visual public campaign. The Inspector will hear about the campaign, read articles in local papers and see banners, window stickers etc. during his/her travels.

Running such a campaign is beyond the scope of this briefing, but it is essential that in the run up to a public inquiry, during and beyond, a campaign is run to highlight the public concern or views on the issue at hand. Remember to pick your campaign issues wisely – the most obvious need not be the most effective. Not many public inquiries are won solely on environmental grounds.

Route map to Public Inquiry



Section 2: Types of inquiry

There are different types of planning inquiry which you will need to be familiar with as each has implications **for** submission timelines – see **Annex C**.

Planning Appeal Inquiry

Planning appeal inquiries are held when a developer appeals against a refusal of planning permission by a local authority; **or** against a condition linked to a permission; **or** where the developer appeals against an authority's failure to issue a decision within the statutory time period (otherwise known as a 'non-determination' appeal).

While in most instances, planning appeals are settled via written representations or a public hearing, the inspector may decide whether to uphold or change the decision issued by the local authority following a public inquiry. Inquiries are usually reserved for highly contentious applications of overriding public interest. Following the inquiry, the inspector will issue their report. It is sent to the council and developer and is published for members of the public on the PINS website.

Further information can be found in **section 5**.

Recovered Appeal Inquiry

This refers to circumstances where an appeal is "recovered" by the SoS for him/her to make the final decision. Recovery can occur at any stage of the appeal, even after the inquiry has taken place. In such cases, the Inquiry will take place, with the Inspector's report passed to the Secretary of State to make the final decision, taking into account the Inspector's recommendation.

Call-in Inquiry

Similar to recovery, this is where a planning application is 'called in' by the Secretary of State (SoS) for Housing, Communities and Local Government (in England) or the Minister for Environment, Planning and Rural Affairs (Welsh Assembly) **before** the planning authority's final decision. The call-in means that the SoS will decide on the application based on the Inspector's report following Inquiry.

If you think that an application should be called in then you must write to the Secretary of State in England or the Welsh Assembly and ask for the application to be called in, clearly explaining why **before** a decision has been made.

The criteria the government uses to decide whether to call in an application in England are listed at **Annex A**.

Section 3: Different stages of an inquiry

There are sets of rules and regulations which go with any formal procedure, including planning inquiries. It can get complicated and confusing, but if you are keen to learn more the resources and references at the end of this briefing should come in useful.

The Planning Inspectorate (PINS) is responsible for setting the inquiry date. This should occur 14 weeks following the date of the start letter. All parties must have their resources ready from the outset, with the following representing the main inquiry stages to bear in mind:

Key points in the public inquiry process

1. pre-submission notification letter sent to PINS by the developer
2. start letter received from PINS (start date set)
3. interested/ Rule 6 Parties confirm intention to take part to PINS (within 1 week)
4. pre-inquiry meeting/conference call (within 7 weeks)
5. statements of case
6. proofs of evidence
7. public inquiry
8. decision
9. appeal (via the courts).

Sticking to deadlines

During the lead up to an inquiry, there will be a set of deadlines depending on the type of inquiry – see **Annex C** for detailed timetable. A lot of these require action by the appellant but, depending on how involved you or your group wish to get (see section 4), some are mandatory for all parties and require attention. For example, 7 weeks after the start date, a pre-inquiry meeting will usually be held to discuss inquiry matters to which all parties (including Rule 6 and interested parties) can attend. This may be undertaken as a conference call where the issues are deemed less complicated by the inspector.

Submissions of evidence, such as **Statements of Case** (SOC) are also required at different times from different parties. A full SOC is initially required only from the appellant when they submit the appeal, and subsequently from the local authority 6 weeks from the start date and later for Rule 6 parties. If written by the council or Rule 6 party, the SOC should set out a succinct statement why the development should be opposed and should be written in a particular way. These must refer (inter alia) to planning policy, all available evidence, setting out planning and legal arguments, citing case law and possible conditions and other requirements. More specific guidance on how to write effect SOCs is given in section 6 and **Annex B**.

Proofs of evidence are also required from the appellant, local planning authority, Rule 6 parties and statutory consultees 4 weeks before the inquiry commences. A proof of evidence (POE) refers to the document containing the written evidence about which a person appearing at a public inquiry will speak, so that the inspector and all other parties involved can easily read and refer to the arguments. These need to be written in a particular way, as described in more detail in **section 6**.

Remember – once the ‘start’ letter is sent out, the clock starts ticking for submission deadlines, so keep an eye on the dates in the letter and Annex C

Rosewell Review 2019

In 2019 an independent review into Planning Inquiries ('the Rosewell Review') made recommendations, some of which PINS is rolling out. These include the creation of a central online appeal portal; quicker pre-inquiry processing; Inspectors being assigned when a 'start letter' is sent; appellants sharing costs of Inquiry venues (instead of the council footing the bill); and more time to allow inspectors to write up evidence immediately after close of an inquiry (et al). The reference section to this guide provides links to these recommendations in full.

Section 4: Getting involved and procedures

As soon as the inquiry is announced via start letter, the clock starts ticking. The start letter will be sent by the PINS and is a crucial document for you to be aware of. It includes the document submission timetable, which is usually set in stone – meaning if you miss a deadline it could jeopardise any future involvement in an inquiry.

More often than not you will be objecting to an application/appeal, but you may also be in support of good applications, such as sustainable housing or renewable energy projects. The case you make needs to accurately reflect your position, but the rules and process apply to both scenarios. Whether supporters will be allowed to present evidence is a matter for the Inspector to decide, but interested parties are usually given a chance to speak where they originally objected to the proposals.

Above all, it is really important to find out who is “on your side”, and network. In this way you can compare approaches and arguments and lend support to one another during the inquiry process. This will aid both your argument and your standing with the inspector. It also avoids wasting time at the inquiry by repeating evidence given by someone else, as repeating evidence does not strengthen your case in the view of the inspector and may waste time.

Remember – networking with others is key to success at a Public Inquiry

As soon as you find out about an inquiry, check the council website or phone the council to find out who its principal contact person is. He/she will then be able to steer you in the right direction and help you with timetables, inquiry preparation, presentation etc. This may be the case officer. Alternatively, contact the PINS case officer (contact details on the start letter) – citing the appeal reference number – and they should be able to advise you accordingly.

If a public inquiry is called for a planning application that concerns you, you have a good opportunity to present your case on behalf of your community. However, your involvement in the inquiry process can demand considerable commitment from you and your supporters. The level of commitment you are willing to give will ultimately depend on your circumstances, but to have the biggest impact we'd recommend applying for **Rule 6 status**. Doing this will, however, require a high level of organisation and time commitments in terms of preparing evidence, developing

your case and submitting evidence in time to meet fixed deadlines, as well as the task of presenting and defending your case at the inquiry – all of which can involve large amounts of time, effort, resource (including financial) and, essentially, teamwork – see **below** for further details.

If you can't commit to be a Rule 6 party, it is still worth objecting, to flag key issues and support other objectors even if you can't do much preparation. This can be done by objecting as an 'interested party' and submitting a representation. If you want to speak at the inquiry, plan what you are going to say in advance and on the day use notes or read out a brief statement. An inspector will usually hear from those who originally objected to the application.

The inspector

The inspector will be from the Planning Inspectorate. He or she will have a great deal of knowledge and experience of the planning system and will be professionally qualified (for example, a former senior planning officer, solicitor, architect etc).

The inspector has considerable discretion in running an inquiry and deciding the schedule. If you have special requirements it is worth contacting the programme officer or the inspector, who may be able to help, or at least take your specific needs into account. Inspectors will also try to ensure that the views of unrepresented third parties are understood and that they are not intimidated by the formality of the inquiry proceedings.

However, it can also be the case that some objectors give long rambling speeches that are largely irrelevant to the proceedings. In such situations an inspector will likely intervene to stop repetitious or irrelevant submissions. To avoid this, you should state your case clearly and concisely.

Inspectors have clear guidelines on what is and is not relevant to a planning inquiry. They will set out what the main issues are both before and when the hearings commence/inquiry opens.

It's therefore really important that you are able to show how your case is relevant when submitting written evidence and when you give oral evidence.

Remember: The inspector is your friend, is impartial and does not work for the developer.

How to take part in the inquiry

As the name suggests, the public can attend and listen to all public inquiries, but are only allowed to present evidence at some, subject to the inspector's discretion and where they've previously engaged with the process.

Although you may have a right to be heard, you will need to tell the Planning Inspectorate that you want to make a case so that you can be included in the timetable and the mailings. Again - depending on whether you're an interested party or Rule 6 - this means you need to make **either** a formal objection (within 5 weeks of the start date) or a full SOC (within 4 weeks of being confirmed as Rule 6). **Annex**

B provides an example SOC, in which key arguments as to why the scheme should be refused should be provided. If submitting a SOC, you will have a chance to expand on this later as a Proof of Evidence.

The stages in an inquiry

The inquiry timetable is outlined in **section 3** and listed in full in **Annex C**.

The inquiry or hearing timetable commences with a start letter sent by the Planning Inspectorate. It is crucial that you start getting all the relevant information about the inquiry from this date, as a strict timetable kicks in as to when things have to happen. Indeed, any prior preparation of your case will be useful and save you time and stress later on.

Larger inquiries will necessitate a pre-inquiry meeting or case management conference call (see **section 3**). Those who have confirmed they wish to speak at the inquiry are also invited to this.

This is to discuss the arrangements for the inquiry. It is an opportunity to raise any problems you have and ask questions about procedure, but **the merits of the planning application will not be discussed at this stage**.

Tip: make sure you attend the Pre-Inquiry Meeting or conference call and find out all you need to know.

In most types of inquiry, you will be expected to give written evidence some time before you get a chance to speak. This will state your case fully, although you will be able to expand on it verbally. Copies of this will be given to other participants and you will receive, or have access to, copies of theirs, and possibly a response to your evidence. After this, you will be able to give written or verbal evidence. This may be in the form of an informal discussion or formal evidence with cross examination by other participants (including legal counsel), depending on whether a hearing or an inquiry is held.

The inspector will generally make one or more visits to the site or sites. There will be no discussion of the case at the site visit, although the inspector will need to be accompanied by the appellant (person who has put in the application to develop) or owner of the site to enable the inspector to get onto the site. You may be allowed to accompany the inspector if he/she gives permission and the owner of the land has no objection.

The role of evidence at inquiries

If you are appearing at an inquiry, the evidence you give will be both written and spoken. To be successful, you will need to give a strong and clear case. You will need to be factual as far as you can, but you can add how you feel about it. Controversial points need to be supported by evidence, usually in the form of references to accepted authorities.

Tip: try to be absolutely clear about what you are giving evidence on.

Written evidence will be more compelling if it is clear and concise. You can read a speech or talk from notes or off the cuff. It is not necessary to read out your submitted written evidence as all the evidence is likely to be taken as read by the inspector. However, you can circulate your prepared speech (if you have one) to parties when/if you are called to give evidence verbally.

There are rules about what is and is not relevant to a planning inquiry. In general, environmental concerns are relevant, but you may need to explain why these are relevant. For this purpose, you can quote national or local plan policies, relevant evidence you are aware of and views of influential or statutory bodies, such as the Environment Agency.

You will need to gather information to support your case. You can use the Freedom of Information Act and Environmental Information Regulations requests if necessary to gather the information. You also need to read carefully the case of your opponents so that you can dispute the arguments they give. There are often technical reports that give details which you should scrutinise.

In an inquiry, verbal evidence may be given formally. You state your case and then you may be cross-examined on your evidence by the developer or the council's counsel. If you are Rule 6, you can usually cross-examine the appellant's evidence if you wish, assuming the inspector gives you permission to do so.

Top tip: do not underestimate the time taken to prepare and present your case.

Section 5: Procedures

Pre-inquiry meeting

The inspector will arrange either a **pre-inquiry meeting** in person or a **Case Management Conference Call** on the phone – up to seven weeks following the start letter – depending on how complicated the inquiry issues. The main participants – which include Rule 6 parties acknowledged by an inspector – will be invited to attend the meeting. Members of the public who've expressed an intent to speak as an interested party may also invited to attend.

In holding such meetings, the inspector's objective is to encourage the parties to prepare for the inquiry, so that time will not be wasted or taken up with matters which are not relevant or in dispute. Among matters which may be discussed and resolved at pre-inquiry meetings are the timetable, sitting hours, evidence formats, and inquiry procedure.

Discussion may cover preparation and exchange of proofs of evidence, including the format which proofs of evidence should take (to include a summary and with technical material as appendices), presentation of evidence and the timing of exchange of proofs in advance of the inquiry or of being submitted. There is, however, no discussion about the merits of the case for or against at this meeting.

Top tip: If you are not sure about something you would like to be clarified, ask a question at the pre inquiry meeting/case management conference call.

Inquiry timetable

Annex C of this guide provides an indication of the way that different types of appeal (including written representations, hearing or inquiry) will be timetabled. The “start” letter will include a timetable of key dates that need to be followed. The inquiry programme is a matter for the inspector’s discretion and needs to be arranged in an efficient and business-like way. The programme officer (or assigned person) will do their best to meet the needs of different people wishing to participate.

The aim of the inquiry programme is to give all participants a clear framework in which to operate, to avoid time wasting and ensure time is used efficiently.

The inspector and programme officer will estimate the duration of each party’s case (including presentation, cross examination and re-examination) to allow a programme to be prepared prior to the inquiry.

Deadlines for submission of written evidence are broadly set out in **Annex C** of this guide, along with other relevant issues such as when the inquiry will be in session.

Sitting hours

Inquiries normally open on a Tuesday at 10am, and sit at 9:30am to 5:30pm (Wednesday to Friday). A 1-hour lunch break and shorter mid-morning and afternoon breaks are also provided. You should not approach the inspector during these times.

It is very important that you make your case at the pre-inquiry meeting or on the conference call if you or your group will find it difficult to attend during normal working hours. For example, you may wish to ask whether some evening sessions can be arranged so that people at work can have a chance to speak. Evening sessions are held at the inspector’s discretion, but Friends of the Earth has previously attended such sessions.

Presentation of cases

What the inspector will be looking for in opening and closing submissions and whether parts of the evidence should be dealt with on a topic basis, will be decided at the pre-inquiry meeting / Case Management Conference. You may wish to ask for sessions where you will be able to present your own evidence and put questions to the appellant’s witnesses on the same day – although you will need to have **Rule 6 status** to request this (see below).

Otherwise, if you’re an **interested party**, it’s recommended you attend the first day of the inquiry as a good inspector will usually schedule a session for interested parties to speak early on. You may also want to attend and ask questions at other sessions – where this is allowed.

Networking with other attendees (objectors or supporters, depending on your argument) is a good way to ensure you don't miss out on key events.

“Rule 6” status

As is suggested above, you and others from your area have the chance to apply for a more substantive role at the inquiry as a rule 6 party. If successful, you will be given a formal opportunity to appear at the inquiry, call your own witnesses and in turn be open to cross-examination.

You will have to work fast and hard if you intend to apply for Rule 6 status and be highly organised, in terms of meeting strict submission deadlines set by the Inspectorate in the 'start' letter. It is advisable to discuss this route with a planning professional before committing to be properly informed of the resources, energy and time you and your group will need to commit. That said, the rewards can be great, and you'll have more influence in the proceedings.

If you intend to apply, it's worth doing so as quickly as possible after the start letter has been issued, as inspectors are unlikely to appoint such status after 7 weeks from the start date (according to PINS guidance). You should also choose one of you to advocate for the group. He/she will take the role of going through each of the witness's evidence in chief, cross-examining the opposing parties' witnesses, and presenting your party's closing statement. **Annex C** provides timetables of when to apply for Rule 6, with further PINS guidance also available in the reference section.

A reminder: You can only apply for Rule 6 status for public inquiries.

Section 6: Written evidence

Statement of Case (SOC)

A SOC sets out your case, identifying the main issues and the evidence to be called.

Where a pre-inquiry meeting/conference call is held before an inquiry, the local planning authority and the appellant will be required to provide their full statements of case earlier on in order to provide the inspector with an idea of the issues to be aired at the eventual inquiry. Full statements of case (FSOC) provide much more detail than previously required in outline SOCs. The appellant needs to submit their FSOC when formally submitting their appeal; the council must submit a FSOC within 5-6 weeks of the start date and Rule 6 parties must do so within 4 weeks of being formally recognised by the inspector (**Annex C**).

The **appellant** must ensure their FSOC gives full particulars and copies of any documents it refers to and any other evidence at the time of making the appeal. It also must contain full details of relevant facts and planning/legal arguments; contain all available evidence; be accompanied by all documents (including for example data, analysis or copies of legal cases) maps and plans and any relevant extracts to which the statement refers – et al (See [PINS Appeal Procedural Guidance 2020](#)).

The **local planning authority's** FSOC is submitted later on, but must include a succinct statement supporting the reasons for opposing the proposal, including differences between the evidence supplied by the appellant and arguments being put forward by the local planning authority. Its FSOC must be accompanied by **all** the documents the local planning authority relies on (including, for example, data, analysis or copies of legal cases) maps, plans and any relevant extracts to which the statement refers. It must also contain all the factual evidence the local planning authority relies on.

A **Rule 6 party's** SOC should follow the above principles, in terms of setting key reasons for opposition, and be accompanied by all documents and evidence it will rely on. This sounds like a lot of work, but where a statement of common ground is agreed between the authority and appellant (see below) the scope of issues may have been lessened somewhat. An example Rule 6 statement of case is provided in **Annex B**.

Where there is a '**call-in**' **application inquiry**, both the local planning authority and the applicant will need to assess what evidence is to be presented in order to cover the matters identified by the Secretary of State as important to his/her consideration of the proposals. See separate PINS Guidance in the reference section for more details.

If you are not Rule 6, but are an '**interested party**', it's likely your appeal representation (submitted within 5 weeks of the start date) will be sufficient for the purposes of making a verbal objection during proceedings, though you may wish to prepare a brief statement to read out at one of the hearing sessions

Top tip: When writing your statement of case:

- **Refer to the Planning Inspectorate's letter setting out the questions to be probed at the Inquiry, and show how your case is going to answer them**
- **for a call-in application, refer to the letter from the Secretary of State setting out the questions to be probed at the inquiry, and show how your case is going to answer them.**

Statement of Common Ground

This is usually submitted by the appellant and local planning authority together with their FSOC. A statement of common ground is essential to ensure that the evidence at an inquiry focuses on the material differences between the appellant and the local planning authority. It should provide a commonly understood basis for the appellant and the local planning authority to inform the statements of case and the subsequent production of proofs of evidence. It should do this by clearly identifying agreed matters between the appellant and the local planning authority, followed by matters that are in dispute. This means that the other documents and the inquiry can focus on the areas still at issue.

While a Rule 6 party does not send in a statement of common ground, it can get involved in the process between the planning authority and appellant. Speak to the inspector or programme officer about this.

Proof of Evidence

A proof of evidence is more formative and represents a written account of the case witnesses want to put before the inspector at the inquiry. It should interpret previously provided evidence in a way which is convenient to the presentation of the witness' case at the inquiry and give their professional opinion on evidence provided by other parties in their statements of case.

Set aside as much time as possible to prepare your proof of evidence. Make sure that your points are easy to follow, as you will need to take the inspector through the arguments. Your evidence should be:

- **clearly set out:** this will help you and the inspector to understand your case
- **clearly written:** use plain English
- **relevant:** cover only areas which remain at issue between the parties
- **supported by appropriate evidence:** refer to third party reports submitted with the application, academic publications and/or other credible sources
- **comprehensive, but succinct:** don't leave things out just because you are reluctant to deal with them. Think of the difficult issues at this stage, and devote preparation time to how you will deal with them at the inquiry. Policy quotes aren't needed, just paragraph references
- **truthful:** if you are found to be dishonest, it will devalue your evidence, and
- **accurate:** if you exaggerate your case, it will weaken it.

Presentation of your proof of evidence is important. Prepare a number of copies. Find out at the pre-inquiry meeting /case management conference how many copies are needed and who needs them. Have some spare in case anyone at the inquiry session needs a copy. It's customary to double space what you intend to read out. In addition, check for spelling and other things appellants (or counsel) would pick up on. Proofs should be page and paragraph numbered. Make sure your name and group are on each sheet, with perhaps the date and session, if appropriate – anything to be helpful! Staple documents rather than paperclip (as the latter get lost). Use size 12 font or larger.

Top tip: keep it simple, to the point and accurate (and make sure it's submitted no later than 4 weeks before the start of the Inquiry – if applicable)

Structure

It may help to structure your proof of evidence as follows:

- 1 Establish your qualifications for giving evidence. Describe your involvement in local organisations and give details of any organisation that you are representing, including membership numbers.

- 2 Point out the features of the site that are important to you. Although others may do this, it's important to put your case in context, in your own way. Highlight what makes the proposed development unacceptable or acceptable.
- 3 Point out elements of particular concern or areas you support.
- 4 Draw attention to the elements of the development plan (local planning policies in force in your area in the Local Plan and, if applicable, Neighbourhood Plan or spatial development strategy), national planning policy, legislation and guidance or other official documents that strengthen your case. Quote from them sparingly and explain their relevance to the appeal and your case.
- 5 Use any information about the planning history of the site that illustrates why the development would be inappropriate or otherwise.
- 6 Outline why you want the inspector to either turn down the appeal or approve it. You need to show the harm or benefits the proposal would cause. Use graphs, diagrams and statistics to illustrate and back up your points.
- 7 Include a summary of your evidence if your proof exceeds 1,500 words.
- 8 Supply any documents you have referred to in your evidence that the inspector will not have access to; the inspector will have copies of all national planning documents and the local planning authority will supply local policy documents.

Top tip: keep your evidence short, focussed and submit it before the deadline.

Section 7: Oral evidence

Oral evidence

You will need to have a written copy of your 'Proof of Evidence', or in some instances your appeal objection (where flexibility is allowed). Use your time to explain the Proof of Evidence to the inspector and flesh out the details.

Presenting your evidence

When delivering your evidence, take a deep breath. This is your opportunity; remember, you have a right to be there. Take your time, as long as you are not wasting time and explain things written in your proof if needed.

Cross-examination

You – as the witness

You have the right to refuse to be cross-examined. In most instances, this will be undertaken by a legal counsel (or barrister). However, evidence that has been tested by such questioning can usually be given more weight by the inspector.

The object of cross-examination is two-fold:

1. to challenge evidence put forward by a witness to reduce its weight in the eyes of the inspector, and
2. to bring out helpful evidence from the witness.

If it is your first time at cross-examination or presenting evidence, be sure to tell the inspector. Remember, the inspector's job is to get information and facts, not to have fun in seeing people suffer at the hands of heavy-handed legal advocates.

If you are being cross-examined do not make the mistake of saving up good points to be introduced later during cross-examination, as the opportunity may not happen. Many lawyers at public inquiries are reluctant to cross-examine third parties.

If you are being cross-examined by an aggressive barrister, stay calm and polite. Your evidence is there in writing in your proof of evidence, so refer them to the answer if it is in your proof.

Some questions you will be able to answer, others not, but it is OK to answer that you don't know. You can also say you will find out the information if needed. If, having been cross-examined, you feel there was something in the cross-examination you did not make clear, ask the inspector for an opportunity to do so.

Remember to listen carefully and answer the question you are asked.

Do not answer what you think the person cross-examining might mean by the question or try to anticipate the next question. If the point put to you is correct then do not try to be evasive. Answer 'Yes' if that is the correct answer.

If you have answered the question put to you but wish to qualify the answer, then you should be allowed to do so. If the person asking the questions tries to stop you qualifying your answer, then tell the inspector that you wish to qualify or add to your answer. But answer the question first without being evasive.

Cross-examining others as a Rule 6 Party

As a Rule 6 Party you have the right to cross-examine other expert witnesses. Questions can be asked that arise out of the witness's whole proof of evidence, not just the summary.

You can have someone next to you to find documents and places in documents if you want. That person should have a copy of what you are saying.

Leading questions – which indicate the answer you want – play an important part in cross-examination. But you must not use leading questions if you are asking questions of a witness on your side.

Do not try to cross-examine another party's witness without preparing first. Make sure that you prepare the questions you wish to ask based on their proofs of evidence and sort out the order in which you propose to ask them. It helps to ensure that your questions are well tied down to answers which the witness has already

given or to statements in the proof of evidence. Make sure that you do not ask the same questions which have already been asked, as the inspector will stop you if you repeat questions already answered.

Listen carefully to the cross-examination which has already taken place and make notes of important answers. It may give you further material for your cross-examination.

Cross-examination can be difficult when a witness stonewalls all your questions. Explain that the question has not been answered and try again. Perhaps try putting it a different way. Be polite but firm. If you are having no success, ask the inspector for help. You cannot always get the answer you want, but you should get an answer. Pay attention to the questions asked by the inspector of all witnesses. This is one of the few pointers you will get about the issues on which the inspector is focusing.

Section 8: The decision

Inquiry decisions do not come at the very end of the inquiry proceedings. Usually, they come a few months after and, ultimately, the decision timeframe depends on who's making it. For a normal appeal inquiry, a decision is issued by the same inspector up to 3 months later. If it's a call-in inquiry or recovered appeal (see section 1), however, the final decision will be made by the Secretary of State (rather than the Inspector), taking into account the report and recommendations of the inquiry inspector. Such a decision could take up to 22 weeks, according to guidance, though in practice may take longer.

When inquiry discussions with all parties are complete, the inspector will close the proceedings and write down his or her detailed conclusions. The inspector's decision is then issued in a 'decision document' or report. Once issued, the decision can then be challenged in the High Court by the developer (appellant), the LPA, or any person who made representations during the course of a planning appeal within 6 weeks of the decision being made. In enforcement appeals the right of challenge is restricted to the appellant, LPA and those having an interest in the land to which the enforcement notice relates. Judicial Review is the only recourse you will have if you are not covered by any of these as there are no third-party rights of appeal in the UK – but the 6-week rule will also apply.

The decision document

In most circumstances the decision will be made by the inspector, except on those cases requiring reports with a recommendation to the Secretary of State (eg call-ins) who then makes the final decision.

The decision will be in the form of a document or letter, sent out to all parties involved. It will be published on the [PINS](#) website.

Overall timescales from submission to decision also depend on whether the appeal was decided via written reps, hearing or public inquiry. Planning Practice Guidance gives the following timeframes for each method from appeal submission to decision:

Planning appeal	Valid appeal to decision
Written representations	25 weeks
Hearings	42 weeks
Inquiries	36 weeks

(source PPG - <https://www.gov.uk/guidance/appeals-average-timescales-for-arranging-inquiries-and-hearings>)

Challenging the decision

Appeal decisions can only be challenged via the High Court within 6 weeks of the date of the decision. It is worth noting that if you lose, you usually have to pay the other party's costs as well as your own.

It is also possible to request the correction of a "correctable error" by making a request in writing within 6 weeks of the decision, provided any error is not part of any reasons given for the decision. S56 of the [Planning and Compulsory Purchase Act 2004](#) covers correctable errors. Further information is also available on the Planning Inspectorate website.

The Rosewell Review into Planning Inquiries

An independent review into planning inquiries was undertaken by Bridget Rosewell (OBE) in 2018, with her findings published in 2019. The aim was to see if decision making timeframes for planning inquiries could be shortened. Recommendations were based around three main themes: 1) encouraging earlier engagement by all parties; 2) providing greater certainty about timescales; and 3) harnessing technology to improve efficiency and transparency. Recommendations included:

- ensuring PINS is notified up to 1 week *before* an inquiry is to be submitted
- shortening the initial timeframe for allocating an inspector (with them now being named on the start letter) so they can get to grips with the key issues of a case and streamline inquiry matters needing discussion more quickly
- proposed sharing of the inquiry venue costs between councils and appellants so the financial burden is not just borne by the council and to speed up identification of a suitable venue
- formation of a central appeal electronic document database where all appeal documents can be viewed by all parties online and
- better focus on timely submission of key documents and a reduction in timeframes of some key parts of the process.

Annex C sets out revised timescales as published in PINS' inquiry guidance (Feb 2020).

Annex A – Call-ins

The government reaffirmed its position on calling in applications in May 2012: – The Minister of State, Department for Communities and Local Government (*then Greg Clark*):

The government believes that planning decisions should be taken in, and by, local communities, and so use their call-in powers sparingly. Essentially, the powers are used when matters are of national significance

In a written statement on 30 June 2008, the Secretary of State set out the circumstances in which the Secretary of State would consider recovering appeals:

- proposals for development of major importance having more than local significance
- proposals giving rise to substantial regional or national controversy
- proposals which raise important or novel issues of development control, and/or legal difficulties
- proposals against which another government department has raised major objections or has a major interest
- proposals of major significance for the delivery of the government’s climate change programme and energy policies
- proposals for residential development of over 150 units or on sites of over 5 hectares, which would significantly impact on the government’s objective to secure a better balance between housing demand and supply and create high quality, sustainable, mixed and inclusive communities
- proposals which involve any main town centre use or uses that comprise(s) over 9,000m² gross floorspace (either as a single proposal or as part of or in combination with other current proposals) and which are proposed on a site in an edge-of-centre or out-of-centre area.

Further additions to the above list since the 2008 statement include:

- appeals involving unauthorised development in the green belt (letter to chief planning officers in England, 31 August 2015)
- appeals for renewable energy development (extended for a year from 9 April 2014 – April 2015; although no further announcements have been made and timeframe may have run out)
- appeals for exploring and developing shale gas (until 16 September 2017 when it will be reviewed. However, there has been no review to date).

In summary, the following are taken into consideration when a decision is made by the Secretary of State whether to recover a planning appeal:

[Written Ministerial Statement \(recovery criteria\) 30 June 2008](#)

[Written Ministerial Statement \(neighbourhood planning\) 9 July 2015](#)

[Written Ministerial Statement \(onshore oil and gas\) 16 September 2015](#)

Annex B – Statement of Case example (extract)

Application for Planning Permission for proposed surface mine, (to include auger mining) for the extraction of coal, sandstone and fireclay, with restoration and ecological uses at Highthorn, Widdrington, Northumberland NE61 5EE

Planning Inspectorate Reference: 315****

Local Planning Authority Reference: 15/****/CCMEIA

Date of Inquiry: 31 May 2017

Rule 6: Outline Statement of Case (Friends of the Earth)

1. INTRODUCTION

1.1 This Statement of Case is submitted by Friends of the Earth, which campaigns for the wellbeing of people and planet. We have a network of over 200 local groups, many of whom are engaged in local planning in order to deliver more sustainable places. We work with communities locally and internationally to protect our natural resources, champion the move to clean energy to keep our climate stable and safeguard the right of every person to have a healthy place to live.

1.2 Friends of the Earth was granted Rule 6 status on 18 October 2016.

1.3 The application is for a proposed surface mine, (to include auger mining) for the extraction of coal, sandstone and fireclay, with restoration to agricultural and ecological uses. The site comprises some 325ha, of which 250 would be subject to mineral extraction. Most of the site is of (moderate quality) grade 3b agricultural land, and has never been developed.

1.4 It is located in the south east of Northumberland, approximately 6km north of Ashington. There are a number of nearby properties in Druridge, Hemscott Hill, Houndalee, Highthorn and Blakemoor Farm. To the east is an extensive area of dunes and beach. The site is near to both the Northumbria Coast SPA, which is also a Ramsar site and a Site of Special Scientific Interest (SSSI), and Cresswell Ponds SSSI; and water from the site would ultimately be discharged into the recently designated Coquet Island to St Mary's Marine Conservation Zone.

1.5 Friends of the Earth's case is that the proposed development is contrary to the development plan and to the government's policy on phasing out coal, reducing greenhouse gas emissions, and promoting renewable and low carbon energy as an alternative to unabated coal power generation. There are no material considerations which justify the grant of planning permission.

1.6 The proposed development will cause environmental harm; the purported benefits of the development are diminished by the government's own policy on coal phase out and are outweighed by the harm which the proposed development would cause.

1.7 Friends of the Earth will contend that the government's own policy on climate change diminishes the weight that can be attributed to the need for the development.

1.8 The Secretary of State will be invited to refuse the development on these grounds.

1.9 Friends of the Earth's letter of 15 December 2015 set out the full extent of its objections to the development. However, Friends of the Earth anticipates that a number of these will be covered by other Rule 6 parties. Friends of the Earth will work with other parties to ensure that overlap in the evidence presented is minimised. Consequently, Friends of the Earth expects to focus its evidence on the issues outlined above and below, in the expectation that issues of more local concern will be covered by those other Rule 6 parties.

2. PLANNING POLICY

2.1 The starting point for the determination of the planning application is the policies in the adopted Development Plan. The Development Plan comprises the saved policies of the adopted Northumberland Minerals Local Plan (MLP) 2000 and Castle Morpeth Local Plan 2003.

2.2 Friends of the Earth will argue that the application is in conflict with the development plan and in particular with saved Policy C3 of the Northumberland MLP, which identifies the Northumberland coast between Amble and Lynemouth as an Opencast Coal Constraint Area, and saved Policy C3 of the Castle Morpeth Local Plan, which identifies the coastal area of Druridge Bay as an Area of High Landscape Value. The site lies wholly within the Opencast Coal Restraint Area, and part of it lies within the Area of High Landscape Value.

2.3 Friends of the Earth will argue that these policies are not out of date, and that there are no other material planning considerations that indicate development should be permitted. Friends of the Earth will refer to the NPPF, as appropriate, in this regard, and to relevant case law on the weight to be attached to the policies of a development plan in the light of the NPPF.

2.4 Friends of the Earth will bring evidence on the weight to be attached to the emerging development plan in the Northumberland Core Strategy (draft).

2.5 Friends of the Earth will also rely on applicable international, national and local policies and relevant statutory duties, including:

2.5.1 Climate Change Act 2008

2.5.2 EU 2020 Climate and Energy Package

2.5.3 UK Low Carbon Transition Plan (2011)

2.5.4 Paris Agreement (November 2016)

2.5.5 Northumberland County Council's Climate Change Action Plan (2008)

2.5.6 Coal Phase Out Written Ministerial Statement (2015)

2.5.7 Coal Generation in Great Britain Consultation Document (2016)

2.5.8 Planning and Compulsory Purchase Act 2004

2.5.9 National Planning Policy Framework (2012)

2.5.10 Planning Practice Guidance (2012-2016)

3. FRIENDS OF THE EARTH'S CASE: CLIMATE CHANGE

3.1 The National Planning Policy Framework (“NPPF”) is clear that: “Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions...” (paragraph 93). It is accompanied by the commitment in paragraph 94 that: “Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations”.

3.2 These policy commitments explicitly link to the objectives and provisions as required by:

3.2.1 the Climate Change Act 2008, which places a duty on the Secretary of State to ensure a reduction in greenhouse gas emissions of 80% by 2050 together with a series of carbon budgets; and

3.2.2 section 19 of the Planning and Compulsory Purchase Act 2004, which places a duty on local planning authorities to include in their Local Plans “policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change”.

3.3 They also reflect the international obligations recently accepted by the United Kingdom to hold the increase in global temperature below 1.5°C and to take action to meet this objective consistent with science and on the basis of equity.

3.4 Friends of the Earth will bring evidence on the extent to which the proposed development is consistent with government policies for meeting the challenge of climate change and facilitating the sustainable use of minerals, as set out in the National Planning Policy Framework, Chapters 10 and 13.

3.5 Friends of the Earth will further expand on this point (as necessary) following the receipt of the further environmental information due on 10 March 2017.

3.6 Friends of the Earth will show that there is a clear obligation imposed by the planning system for development, and in particular applications for the extraction of coal, to contribute to meeting national objectives for greenhouse gas emissions at the local and national level, and that the greenhouse effects of the proposed development, including both on and offsite emissions, are significant. Permission should be refused as a result.

[Other issues of coal phase out and renewable and low carbon energy were also argued in the statement of case, but are not repeated here]

Annex C – Appeal (written representations, hearing, inquiry) timetable

Timetable	Appeal – “written representations” (excludes householder, adverts and minor commercial) see Appendix D.1 & D.2 of 2020 PINS guide.	Appeal – hearing (excludes householder and minor commercial development appeals) see Appendix E.1. of 2020 PINS guide.	Appeal – public inquiry – ‘not recovered’ (excludes householder and minor commercial development appeals) see Appendix F.1 of 2020 PINS guidance.	Appeal Inquiry – “recovered” by Secretary of State Appendix G.1 of 2020 PINS guidance.
At least 10 days before appeal submission			Appellant informs PINS and local planning authority (LPA) of intention to submit an appeal.	Appellant informs PINS and LPA of intention to submit an appeal.
Appeal/ Plan received PINS sets start date and timetable	Appeal form and full statement of case sent to PINS. LPA received documents.	All appeal docs (including form, full statement of case and draft statement of common ground) sent to PINS and LPA.	Appeal form and supporting docs (as well as full statement of case and draft statement of common ground) submitted by appellant and sent to PINS and LPA. Statement of case cannot be amended.	Appeal form and supporting docs (as well as full statement of case and draft statement of common ground) submitted by appellant and sent to PINS and LPA (statement of case can be amended after pre-inquiry meeting – if needed).
Appeal start date commences	PINS acknowledges receipt of all documents for appeal and sends to LPA. A “start date” is set and a letter is sent with inspector announced and key submission dates.	PINS acknowledges receipt of all documents for appeal and sends to LPA. A “start date” is set and letter sent with inspector announced and key submission dates.	PINS acknowledges receipt of all documents for appeal and sends to LPA. A “start date” is set and letter sent with inspector announced and key submission dates. The inquiry date should be set within 14 weeks of start date (but anywhere between 13-16 weeks is “acceptable”).	PINS acknowledges receipt of all documents for call-in. A “start date” is set and letter sent with inspector announced and key submission dates. The inquiry date should be set within 14 weeks of start date (but anywhere between 13-16 weeks is “acceptable”).
Within 1 week of start date		“Interested people” (who previously objected to application) receive letter from LPA advising they must send	LPA notifies “interested people” (who previously objected to application) advising they must send further representations	

		further representations within 5 weeks of start date (response can be based on appellant’s statement of case). LPA sends PINS and appellant completed questionnaire and supporting documents.	within 5 weeks of start date (response can be based on appellant’s SOC). Anyone wanting to apply for Rule 6 status should do so ASAP (and is unlikely to be accepted if past week 7). LPA should send PINS and appellant completed questionnaire and supporting documents.	
Within 2 weeks of start date	“Interested people” (who previously objected to application) receive letter from LPA advising they must send further representations within 5 weeks of start date. LPA sends PINS and appellant completed questionnaire and supporting documents.			LPA notifies “interested people” (who objected to application) advising they must send further representations within 5 weeks of start date (response can be based on appellant’s SOC) Anyone wanting to apply for Rule 6 status should do so ASAP (and is unlikely to be accepted if past week 7). LPA should send PINS and appellant completed questionnaire and supporting documents.
Within 3 weeks of start date				
Within 5 weeks of start date	Interested parties should send representations to PINS. If LPA	Interested parties should send representations to PINS. LPA to	Interested parties should send representations to PINS. LPA to	

<p>*Very important this deadline is not missed*</p>	<p>decides not to treat questionnaire and supporting docs as submission, it sends full statement of case.</p>	<p>send its full statement of case and agreed statement of common ground.</p>	<p>send its full statement of case and agreed statement of common ground.</p>	
<p>Within 6 weeks of start date</p>				<p>Interested parties should send reps to PINS.</p> <p>LPA to send its full statement of case and agreed statement of common ground.</p> <p>Rule 6 parties can get involved in statement of common ground process, also. Submission timings may differ depending if pre-inquiry meeting is called by the Secretary of State or inspector.</p>
			<p>Rule 6 party submits full statement of case within 4 weeks of inspector confirming Rule 6 status.</p>	<p>Rule 6 party submits their full statement of case within 4 weeks of inspector confirming Rule 6 status.</p>
<p>Within 7 weeks of start date</p>	<p>Appellant sends final comments on LPA’s case and on representations from interested parties. Copy of planning obligation sent to PINS – no new evidence allowed once submitted.</p>		<p>Pre-inquiry meeting or case management conference held between appellant, LPA and any third party afforded Rule 6 status (where applicable).</p> <p>Discussion of matters to be examined at the Inquiry and provides an opportunity for</p>	<p>Pre-inquiry meeting (or case management conference call held between appellant, LPA and any third party afforded Rule 6 status (where applicable).</p> <p>Discussion of matters to be examined at the inquiry and provides an opportunity for</p>

			parties to ask procedural questions.	parties to ask procedural questions.
10 weeks before hearing		Hearing date announced.		
6 weeks before hearing				
4 weeks before Inquiry/hearing			Appellant, LPA and Rule 6 Party sends PINS its proofs of evidence. LPA to notify Inquiry is taking place in local paper.	Appellant, LPA and Rule 6 Party sends PINS its proofs of evidence. LPA to notify Inquiry is taking place in local paper.
At least 2 weeks before inquiry		Interested parties receive details from LPA on hearing arrangements. LPA may put a notice in local paper regarding hearing.	Interested parties receive details from LPA on inquiry arrangements. Appellant displays a site notice with inquiry details.	Interested parties receive details from LPA on inquiry arrangements. Appellant displays a site notice with Inquiry details.
No later than least 10 working days before the Inquiry		Appellant sends draft planning obligation to PINS – if relevant.	Appellant sends draft planning obligation to PINS – if relevant.	Appellant sends draft planning obligation to PINS – if relevant.
Inquiry/Hearing commences		All parties to attend on time. Members of the public may have opportunity to be heard, although discretionary. Hearing usually lasts 1-2 days.	All parties to attend on time. Interested parties should attend first day as inspector may ask if anyone would like to speak, usually the best chance to air grievances if you are not registered as Rule 6. Site visit, cross-examination and presentation of evidence all take place.	All parties to attend on time. Interested parties should attend first day as inspector may ask if anyone would like to speak, which is the best chance to air grievances if you are not registered as Rule 6. Site visit, cross-examination and presentation of evidence all take place.
Post hearing/inquiry				
Decision/Report issued	Inspector visits site and decision issued in 14 weeks.	Decision issued within 14 weeks.	Decision issued up to 3 months later.	PPG states decision could take up to 22 weeks.

Further information and guidance:

Friends of the Earth – Tel: 020 7490 1555
1st Floor, The Printworks, 139 Clapham Road, **London**, SW9 0HP.
www.foe.co.uk

Useful resources

It is vital that you get hold of several excellent publications which go into much greater detail than this briefing.

Called-in applications and recovered appeals

<https://www.gov.uk/government/collections/planning-applications-called-in-decisions-and-recovered-appeals>

Call-ins (House of Commons Library) 2019

<http://researchbriefings.files.parliament.uk/documents/SN00930/SN00930.pdf>

Calling in Planning Applications – Commons Research Briefing, House of Commons, (January 2019) <https://commonslibrary.parliament.uk/research-briefings/sn00930/>

Code of Conduct for all who work for the Planning Inspectorate

<https://www.gov.uk/government/publications/code-of-conduct>

“The Conduct of Planning Inquiries – should advocates sit or stand?”

<https://www.gov.uk/government/publications/conduct-of-inquiries>

Environment Agency Public Registers

<https://www.gov.uk/guidance/access-the-public-register-for-environmental-information>

National Infrastructure Planning

<https://infrastructure.planninginspectorate.gov.uk/>

National Planning Policy Framework

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Neighbourhood Statistics

www.neighbourhood.statistics.gov.uk

[PINS guidance on statements of case \(2019\)](https://www.gov.uk/government/publications/statement-of-case)

<https://www.gov.uk/government/publications/statement-of-case>

PINS Guide to Rule 6 for interested parties involved in an inquiry – planning appeals and called-in applications – England (2019)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/832158/guide_rule_6_planning_Sept_2019.pdf

PINS Procedural Guide: planning appeals – England (2020)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/864777/Procedural_Guide_Planning_appeals_version_8.pdf

The Planning and Compulsory Purchase Act 2004
<http://www.legislation.gov.uk/ukpga/2004/5/contents>

Planning appeals guidance
<https://www.gov.uk/guidance/appeals>

Planning Appeals Division Northern Ireland <https://www.pacni.gov.uk/>

Rosewell Review of Planning Inquiries (2018)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/777822/Independent_Review_of_Planning_Appeal_Inquiries_Exec_Summary.pdf
The Town and Country Planning (Local Planning) (England) Regulations 2012 <http://www.legislation.gov.uk/uksi/2012/767/contents/made>

Government departments, agencies and public bodies

Environment Agency
<https://www.gov.uk/government/organisations/environment-agency>

Information Commissioner's Office
<https://ico.org.uk/>

Ministry for Housing, Communities and Local Government
<https://www.gov.uk/government/organisations/ministry-of-housing-communities-and-local-government>

The Planning Inspectorate
<https://www.gov.uk/government/organisations/planning-inspectorate>

Planning Portal
www.planningportal.co.uk

Non-Governmental Organisations (NGOs)

Air Quality – UK National Air Quality site
www.airquality.co.uk

CPRE - The Countryside Charity
www.planninghelp.org.uk

Environmental Law Foundation
www.elflaw.org/

Liberty
www.liberty-human-rights.org.uk/

Wildlife and Countryside Link
www.wcl.org.uk