Greater Cambridge Local Plan Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.

Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.

Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.

By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.

Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	**Personal details ***	**Agent's details (if applicable)**
Name	Dr. William Harrold	
Organisation (where relevant)	Cambridge Approaches Limited	
Job Title (where relevant)		
Address, including Post Code	[redacted]	
Telephone	[redacted]	
Email address	[redacted]	

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	X

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	No
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

1. The statutory duty

1.1 Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (SI 2017/1012) ("the Regulations" and "Regulation 105"respectively) requires the competent authority preparing a land use plan – here, Cambridge City Council and South Cambridgeshire District Council jointly (as Greater Cambridge Shared Planning ("the Councils")) – to undertake an Appropriate Assessment (of the implications of the plan for a European site, in view of that site's conservation objectives, where the plan is likely to have a significant effect on the site, either alone or in combination with other plans or projects. Under Regulation 105, the plan may only be given effect once the competent authority has ascertained, applying the precautionary principle, that it will not adversely affect the integrity of the site. The Court of Justice's test – established in *Waddenzee,* Case C-127/02[2], and *Sweetman v An Bord Pleanála*, Case C-258/11[3], and consistently applied by UK courts since, including in *Wyatt v Fareham* [2022] EWCA Civ 983[13] – is that this conclusion may only be reached where there is no reasonable scientific doubt as to the absence of adverse effects. This document is in response to the GSCP Reg. 19 HRA and all paragraph and Appendix references in this representation (e.g. '5.23', 'Appendix F.14') are a reference to that document. Bold references are the sections in this document e.g. **1.1**

1.2 The words '*either alone or in combination with other plans or projects'* in Regulation 105(1)(a) are not an election available to the plan-making authority as to how it conducts its Appropriate Assessment; they define the trigger for when an Appropriate Assessment is required. The provision asks whether a likely significant effect on the SAC could arise via either route – the plan's own contribution, or the plan's contribution added to that of other plans and projects – and if either route produces a likely significant effect, an Appropriate Assessment must follow. 'Or' in domestic legislation is typically read as an inclusive rather than an exclusive. Nothing in Regulation 105(1) then confines what that Appropriate Assessment must examine to whichever route triggered it: the assessment required is *'of the implications for the site in view of that site's conservation objectives*' – the object is the site's conservation objectives, not the Local Plan considered in isolation – and the ultimate question under Regulation 105(4) is whether the plan-making authority has ascertained that the land use plan 'will not adversely affect the integrity of' the site, a question about the real-world, cumulative pressure on the site which cannot be answered by examining only one contributor to it. Reading 'or' as conferring a choice would also make the words 'or in combination with other plans or projects' redundant: if an authority could always discharge Regulation 105 by assessing the plan alone, those words would do no legal work – contrary to the ordinary presumption against surplusage, and to the purpose of Article 6(3) of the Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and wild fauna and flora ("Article 6(3)"), which Regulation 105 implemented and which uses the same 'individually or in combination' formulation for the same reason, i.e. to prevent the combined impact of separate plans or projects on a European site escaping assessment because each is considered only in isolation. The Court of Justice has confirmed exactly this in practice: in Case C-142/16 *Commission v Germany ('Moorburg')*[12]. Germany was found in breach of Article 6(3) precisely because a power station's effects on a protected fish population had been assessed, and mitigated, on their own, without combining them with the effects of an existing upstream plant on the same population – the fact that the scheme's contribution

had been addressed did not satisfy the duty. In any event, this does not assist the Councils on the facts: the screening chapter did not rely on the 'alone' limb to the exclusion of the 'in combination' limb – paragraph 4.16 identifies East West Rail by name as a further contributor and states that the resulting effect 'is considered further at the Appropriate Assessment stage' (see **2.3** below). Having themselves treated the in-combination question as live and carried it forward to Chapter 5, the Councils cannot now treat Regulation 105(1) as permitting them to have left it unexamined there.

1.3 The population of barbastelle bats in the SAC is controlled by, amongst other factors, the available food resources. It will be in a Malthusian equilibrium where any adverse effect on neighbouring populations may increase competition for the remaining food supply. Any reduction in available food supply from other plans or projects in the area of the plan like East West Rail or the Cambourne to Cambridge Busway might also have an effect on competition for what food remains. This is what Regulation 105 (4) requires; the bats are potentially affected by all these things and have no knowledge of which plan or project might be causing their loss of food. They just starve to death. F.14 bullet 2 states '*Any mitigation required of policies in the Local Plan in relation to loss of (or disturbance of species at) functionally linked habitats is intended to mitigate the contribution of the Local Plan to in-combination effects, not to mitigate the effects of East West Rail.*' No attempt is made to even assess the effects of East West Rail which is in direct contravention of the *Moorbur*g case (see **1.2**). There is a subsidiary point. The argument in the Reg. 19 GCSP HRA depends on reference 24 at paragraph 3.21 (Defra (2026) Draft Eversden & Wimpole Woods SAC bat protocol, unpublished). This is to an unpublished DEFRA document and if it is to be referred in the HRA to it needs to be published. The same applies to any other such reference not available to the public.

1.4 It is also not open to the competent authority to discharge this Appropriate Assessment duty by reference to an assessment that has not yet been carried out by a third party. Tiering of assessment to a later consent stage is only lawful where (a) there is no reasonable scientific doubt now that adverse effects can be avoided, *and* (b) the later stage constitutes a further, equally rigorous assessment with a secured outcome (*R (Champion) v North Norfolk DC* [2015] UKSC 52[4]). Plan-level in-combination assessment must also properly address known, reasonably foreseeable projects; it cannot omit them because their assessment is incomplete (*Wealden DC v Secretary of State for Communities and Local Government* [2017] EWHC 351 (Admin)[5]). The 'no reasonable scientific doubt' standard, and the weight properly to be given to evidenced consultation with Natural England in meeting it, has since been restated by the Court of Appeal in *R (Wyatt) v Fareham Borough Council* [2022] EWCA Civ 983[13]; it is not met by a bare assertion that a related scheme's effects fall outside the scope of the assessment.

1.5 This is confirmed by the Court of Justice's judgment in Case C-461/17 *Holohan v An Bord Pleanála*[14], which holds that an Appropriate Assessment *'may not have lacunae and must contain complete, precise and definitive findings and conclusions capable of dispelling all reasonable scientific doubt as to the effects of the works proposed on the protected site concerned'*, and that, before a plan or project is approved, *'all aspects of [it]... which may, either individually or in combination with other plans or projects, affect [the site's] conservation objectives must be identified, in the light of the best scientific knowledge in the field*.' The Councils' screening chapter identifies East West Rail as such a project at paragraph 4.16 and states that it will be examined at Appropriate Assessment stage; the Appropriate Assessment then did not examine it (see **2.3** below). That is a lacuna in exactly the sense *Holohan* prohibits, and it is not cured by the explanation given at Appendix F.13 that the 'alone' trigger made further examination optional or even unnecessary (see **1.3** above).

1.6 It is clear from the 9 June 2026 South Cambridgeshire District Council (SCDC) Response to the 2026 EWR Non Statutory Consultation that the impact of EWR on the SAC was a concern. '*Barbastelle bat SAC and ecological connectivity: The Eversden and Wimpole Woods Special Area of Conservation remain a significant ecological concern for the Council. The Council requires EWR Co to incorporate male barbastelle bat territories within the Habitats Regulations Assessment, share ecological survey data with*

the Council's officers, and demonstrate a robust mitigation strategy. This should be reflected within the bridge and watercourse crossing designs, the Habitats Regulations Assessment, the Environmental Statement and the long-term management proposals.'[23] This response was authored by Greater Cambridge Shared planning on behalf of SCDC. It demonstrates significant concern about the impact of EWR on the SAC and a requirement to share survey data. How can the conclusion of 5.23 be consistent with this consultation response? It is not.

2. What the July 2026 HRA actually does

2.1 The July 2026 HRA is a small improvement on the October 2025 draft habitats regulation assessment, which did not mention East West Rail at all. This version now mentions EWR and records, at Appendix F.14, that consultation '*has been undertaken with the East West Rail team (see paragraph F.18) to understand the approach that they have taken*' to the habitats regulation assessment for that scheme, with further detail of that consultation – including a meeting with EWR Co.'s relevant consultants (Mott MacDonald/WSP) in April 2026 – given at Appendix F.18.

2.2 However, the substantive conclusion at paragraph 5.23[6] – that there will be *'no adverse effects on the integrity of Eversden and Wimpole Woods SAC, as a result of physical damage/loss or non-physical disturbance of functionally linked land*' – relies **exclusively** on Local Plan policies (BG/BG, BG/TC, GP/QD, I/CM and site-specific safeguards in S/CB, S/BA, S/CBN and S/SEA/CBN) that mitigate the Local Plan's housing-related contribution: bat surveys, dark corridors, sensitive lighting and retained woodland on the allocated sites themselves. Nothing in that conclusion assesses or mitigates the severance and fragmentation of the barbastelle commuting/foraging corridor that would result from the East West Rail line itself cutting through the Core Sustenance Zone and Landscape Connectivity Zone of the SAC – the mapped 6km and 6–10.2km bands by which the Councils' HRA methodology gives concrete effect to the general concept of 'functionally linked land' for this species. Nor does the conclusion assess or consider how East West Rail will interact with and impinge upon the effectiveness of those Local Plan policies. The 2022 EWR Survey report has been available since 5 Feb 2025 on WhatDoTheyKnow.com and the unredacted maps were also obtained on appeal they show significant barbastelle foraging areas in Knapwell north of Cambourne where the houses are planned.[24] We remain happy to share the unredacted maps even if EWRCo. are not. We could have shared this information earlier if SCDC had agreed to meet us as requested since January 2026. Of course, the males, although still essential to maintain the population Barbastelles tend to forage further afield perhaps more directly into the areas proposed for new housing such as Bourn Airfield and North Cambourne.

2.3 This is not simply an evidential gap; it is an internal inconsistency in the Councils' stated methodology. Paragraph 4.16 of the screening chapter of the July 2026 HRA identifies East West Rail by name as a potential contributor to in-combination effects on this same functionally linked habitat, and states in terms that '*[the effect] is considered further at the Appropriate Assessment stage.*' Chapter 5, paragraphs 5.11–5.23[6] – the Appropriate Assessment itself – does not mention East West Rail once. It moves directly from the Local Plan's site allocations (S/BA, S/CB, S/CBN, S/SEA/CBN) to Local Plan mitigation policies (BG/BG, BG/TC and site-specific safeguards) and then to the conclusion, at paragraph 5.23, that there will be 'no adverse effects on the integrity of Eversden and Wimpole Woods SAC.' The very matter the screening chapter said would be examined at Appropriate Assessment stage is simply absent from it. A 'no adverse effect' conclusion cannot lawfully be reached on the strength of an assessment that never carried out the enquiry its preceding chapter said it would (see also **1.3** above, where the Councils' explanation for this gap is addressed).

2.4 The Councils confirm the same substantive gap in terms at Appendix F.14[6]: *'Any mitigation required of policies in the Local Plan in relation to loss of (or disturbance of species at) functionally linked habitats is intended to mitigate the contribution of the Local Plan to in-combination effects, not to mitigate the effects of East West Rail.*' EWR Co.'s habitats regulations assessment does not yet exist and is not

expected until EWR Co submits its Development Consent Order application, expected in 2027[10] – after this Local Plan is due to be submitted for examination. The efficacy of EWR's proposed mitigation (bat bridges and underpasses) is itself contested in evidence already before the Councils: Appendix F.11[6] records a representation citing a 2012 study indicating that barbastelle bats do not reliably use linear landscape features to commute, calling the effectiveness of bridge/viaduct mitigation into question.

2.5 Appendix F.14, bullet 2 states the principle the Councils rely on to justify this: '*Any mitigation required of policies in the Local Plan in relation to loss of (or disturbance of species at) functionally linked habitats is intended to mitigate the contribution of the Local Plan to in-combination effects, not to mitigate the effects of East-West Rail*.' That principle is wrong, and the Court of Justice's decision in *Moorburg*[12] shows why. Germany's authorisation of the Moorburg power station was found unlawful under Article 6(3) precisely because its effects on protected fish populations in the Elbe were assessed and mitigated – by proposed fish ladders – on their own, without combining them with the effects of the existing upstream Geesthacht plant on the same population. The power station's own mitigation may, on its own terms, have been perfectly adequate to its own contribution; that was not the point. The error the CJEU identified was treating 'this scheme's contribution has been mitigated' as sufficient, when Article 6(3) asks whether the site's conservation objectives are protected considering every relevant contributor together. Appendix F.14, bullet 2 states the same reasoning as a matter of policy for this Plan: the Local Plan's mitigation deals with the Local Plan's contribution, not East West Rail's. That is not an answer to what Regulation 105(4) requires, which is a conclusion about whether Eversden and Wimpole Woods SAC's integrity will be preserved, **taking East West Rail's contribution into account alongside the Local Plan's own**. We recognise that the LP has no powers to mitigate the effects of EWR, but their mitigated effect in combination with those of the plan still need to be assessed with respect to the conservation objectives of the SAC.

2.6 On this evidence, there is reasonable scientific doubt as to whether adverse effects on the integrity of the SAC can be excluded once EWR's contribution is taken into account. The HRA's 'no adverse effect' conclusion at paragraph 5.23 is not, therefore, safely reached in combination with EWR, notwithstanding that it may be sound in relation to the Local Plan's allocations considered alone.

3. The Plan itself depends on East West Rail – it does not merely coincide with it

3.1 This matters because the Councils cannot treat East West Rail as an independent, unrelated project whose effects are someone else's problem, while simultaneously relying on it to justify the scale, form and deliverability of the Cambourne allocations. The Councils' report to the Performance, Assets and Strategy Overview and Scrutiny Committee (4 November 2025, on the Draft Local Plan)[7] states: *'Earlier stages of the Local Plan highlighted how the spatial strategy, and specific proposals under development, depended upon decisions on key infrastructure projects such as East West Rail (EWR)…*'. The same report confirms that, as of that date, *'Decisions consenting key infrastructure projects such as East West Rail, the Cambourne to Cambridge, Cambridge South East and Waterbeach to Cambridge public transport corridors remain outstanding at this time*' – i.e. EWR had not then, and still has not now, received development consent.

3.2 The Local Plan's vision and policy text for Cambourne[8] confirm the same dependency. The supporting text states that *'Planned new infrastructure means that Cambourne will become one of the best-connected places in the region with the A428 upgrade, Greater Cambridge Partnership's proposed public transport corridor and East West Rail project connecting Cambridge with Oxford delivering a new railway station'*, and that it is *'Through the new railway station being delivered by the East West Rail project… Cambourne will become a destination in its own right'*. Policy S/CBN itself requires development to *'Avoid prejudicing the delivery of the preferred East West Rail route alignment and associated rail infrastructure*', and the supporting text records that *'The new East West Rail station and busway provide*

good opportunities to enable greater density of development' – i.e. the quantum and density of the allocation are themselves predicated on the railway being delivered.

3.3 The Plan cannot have it both ways. If the scale, density, movement strategy and 'destination' vision for Cambourne and Cambourne North depend on East West Rail being delivered – as the Councils' scrutiny report and policy text say they do (see **3.1** and **3.2** above) – then East West Rail is not a separate, insufficiently defined project that can be left out of the Plan's habitats regulations assessment, as the July 2026 HRA has done. It is integral to the Local Plan, and its effects on Eversden and Wimpole Woods SAC must be assessed as part of the Local Plan's Appropriate Assessment before that plan is adopted, not left to EWR Co.'s, as yet unpublished process. The only lawful alternatives are: (a) the Councils obtain and rely on adequate assessment – whether EWR Co.'s published, examined habitats regulations assessment or an equivalent evidenced and secured assessment – demonstrating no reasonable scientific doubt that the SAC's integrity will be preserved on the currently preferred southern route, before the Local Plan is submitted for examination; or (b) the Councils accept that this cannot presently be demonstrated, and act accordingly – supporting, for example, East West Rail's alternative northern approach to Cambridge while phasing the Cambourne and Cambourne North housing trajectory so that it does not assume delivery of the railway until the route question is resolved. It is not open to the Councils to rely on East West Rail to justify the allocation while disclaiming responsibility for assessing its ecological impact.

3.4 The Councils' methodology confirms that East West Rail was never too remote or speculative to require examination. The HRA's guidance on identifying relevant plans and projects for in-combination assessment[6] states that consideration will focus on *'any strategic projects in the area that could have in-combination effects with the GCLP*', and lists, citing the 'HRA Handbook', categories relevant to that exercise including *'proposals in draft plans formally published or submitted for final consultation, examination, or adoption.*' East West Rail – with government funding committed, four rounds of public consultation since 2019 (2019, 2021, 2024 and 2026), a published preferred route and station location, and a Development Consent Order application – its next and only statutory stage – anticipated in 2027 – comfortably meets this test. In any event, the point is academic: paragraph 4.16 already treats East West Rail as sufficiently certain to require examination at Appropriate Assessment stage (see **2.3** above). The Councils cannot now credibly contend it was too remote to assess.

4. Anticipated response – 'this is covered by EWR Co's assessment' – and why that does not satisfy Regulation 105

4.1 The Councils may respond that no separate assessment of East West Rail's effect on the SAC is required in this Plan's HRA, even accepting the Plan's dependency on East West Rail described above, because that effect will be assessed by EWR Co as part of its Development Consent Order (DCO) application. That response does not answer our objection, for four reasons.

4.2 First, it conflates two distinct statutory duties held by two different competent authorities. Regulation 105[1] imposes a duty on the Councils, as the competent authority preparing this Local Plan, to assess the plan's likely significant effects on the SAC alone and in combination with other plans and projects, before the Local Plan is given effect. A separate duty will fall on the Secretary of State, as the competent authority determining EWR Co.'s DCO application under the Planning Act 2008, to assess the railway's own and in-combination effects before that consent is granted, under the equivalent project-level provision, Regulation 63[9]. EWR Co.'s future habitats regulations assessment will go towards discharging the Secretary of State's duty in relation to the railway; it cannot discharge the Councils' prior and distinct duty in relation to this Local Plan. There is no mechanism by which one competent authority's anticipated future compliance with its duty satisfies a different competent authority's separate duty to assess a plan now.

4.3 This is not merely a matter of statutory construction; it has been tested and confirmed in *R (Caffyn) v Shropshire Council [2025]* EWHC 1497 (Admin). The court rejected the argument that a competent authority may confine its in-combination assessment to projects within its own decision-making scope, addressing precisely the 'vertical division of labour' presented here – one type of consent given by one body, a different consent given by another: *'Smaller [projects] get consent from one body. Bigger [projects] get a different consent from another body. Each body would need to consider [relevant projects] within the decision-making scope of the other. Otherwise, there would be a lacuna. Real-world, in-combination effects would be missed. To the habitat and its species, there is no material distinction based on who hands out the permit.*' The court went further: *'The existence of a parallel control regime – or another competent authority – is not a basis for confining and limiting the scope of an assessment which [the competent authority] is statutorily obliged to conduct… If each competent authority or species of competent authority considers only its own consented projects, there will be a disjointed habitats lacuna, in an holistic-effects protection regime.*'

4.4 That reasoning applies with at least equal force here. East West Rail Company's Development Consent Order will be determined by the Secretary of State for Transport under the Planning Act 2008 – a different consenting tier from the Councils' Local Plan, on facts squarely within the 'vertical division of labour' the court in *Caffyn* described and decided under the same statutory formula (Regulation 63(1)(a)[9]) the court was there construing. The fact that a different, national-level body will determine EWR Co.'s consent is not a basis on which the Councils may confine their own Regulation 105 in-combination assessment to projects within their own decision-making scope. On *Caffyn's* reasoning, doing so is precisely the 'disjointed habitats lacuna' the in-combination duty exists to prevent.

4.5 Second, the 'in combination' limb of Regulation 105 exists precisely to capture cumulative effects that no single project's assessment will address. *Wealden DC v Secretary of State for Communities and Local Government* [2017] EWHC 351 (Admin)[5] confirms that a plan-making authority cannot discharge its in-combination duty by pointing to the fact that another, related project will have its own separate assessment; it must itself assess the combined effect, using the best available evidence and reasonable worst-case assumptions where firm figures are not yet available. This is the outcome Regulation 105 is designed to prevent (see Figure 1 below).



Figure 1: *'in combination' requires the union of both circles – everything either scheme contributes – not just the narrow area where their footprints happen to overlap.*

4.6 Third, *R (Champion) v North Norfolk DC* [2015] UKSC 52[4] does not support deferring the whole assessment of a contested pathway of harm to a separate consent regime run by a different public body, on a different project, to a different timetable. *Champion* concerned a technical implementation detail (a drainage scheme) reserved by condition within the same decision, where the decisionmaker had already concluded, on the evidence available to it, that adverse effects could be excluded beyond reasonable scientific doubt. That is not the position here: the efficacy of EWR's proposed mitigation is itself contested (see section **2** above), and the Councils' consultation record shows this is treated as a live, unresolved concern, not a matter of settled technical detail.

4.7 <Intentionally Left Blank>.

4.8 This is not simply a matter of how the objection reads Regulation 105 and Regulation 63 together; it reflects the Planning Inspectorate's current published advice on how competent authorities should coordinate exactly this situation. The Inspectorate's guidance 'Nationally Significant Infrastructure Projects: Advice on Habitats Regulations Assessments'[15] advises that an NSIP applicant's in-combination assessment should treat 'projects identified in the relevant development plan (and emerging development plans... with appropriate weight being given as they move closer to adoption)' as a relevant factor – confirming that the obligation to consider the Local Plan and East West Rail together runs in both directions, not only from the Councils outward to EWR Co. The same guidance states that, where parallel consents are in play, applicants *'should consult other Competent Authorities... and confirm with those Competent Authorities whether they want to adopt the reasoning or conclusions of the assessment carried out*' under the other regime. No such consultation, confirmation or agreed mechanism between the Councils and EWR Co, or the Secretary of State, is recorded anywhere in the July 2026 HRA or its Appendices. The Councils have not coordinated with the other competent authority in the manner official guidance describes; they have simply assumed that the other authority's future assessment will suffice.

4.9 A second, narrower response the Councils might give is that no in-combination assessment is required at all, because the Appropriate Assessment already found no residual effect from the Local Plan's own allocations. In *R (Foster) v Forest of Dean District Council* [2015] EWHC 2648 (Admin)[18], Cranston J held that *'there is no basis to carry out an assessment of in combination effects when there are no effects to take into account'*, because the Council's finding that the development had no residual effect on bats, after mitigation, was 'supported by Natural England' and not shown to be irrational.

4.10 That defence does not apply here, for two reasons. First, paragraph 5.23 does not find that the Local Plan's allocations have no residual effect on the functionally linked habitat; it finds *'no adverse effects on... integrity... as a result of physical damage/loss or non-physical disturbance*', reached only through active mitigation – bat surveys, dark corridors, sensitive lighting and retained woodland. A finding that mitigation has reduced an effect below the threshold of adversity to integrity is not the same as a finding that there is no effect at all: it presupposes one. Nor, unlike *Foster*, has Natural England agreed that the Local Plan's contribution is nil; its recorded involvement (Appendix F.15–F.18[6]) concerns bat consultation bands and functionally linked habitat zones generally, not a finding of zero residual impact. In any event, this is a case where East West Rail itself could interact with and impact on the effectiveness of the active mitigation provided for in the Local Plan; the effectiveness of mitigation and in-combination effects cannot be untangled.

4.11 Second, and more fundamentally, the premise that this part of the landscape presents no residual effect from development is contradicted by evidence the Councils have not addressed at all. As set out in Cambridge Approaches' separate representation on the July 2026 HRA's treatment of Hardwick Wood, submitted alongside this representation, East West Rail Company's 2022 survey confirms a barbastelle maternity colony at Hardwick Wood SSSI sharing a foraging resource with the SAC's colony, and the Councils' Appendix E records functional connectivity between the Bourn Airfield Strategic Enhancement

Area and Hardwick Wood without ever identifying or assessing that shared resource. A residual-effect finding of zero cannot be sustained for a functionally linked habitat whose most directly relevant additional roost site and shared foraging resource has not even been identified, let alone assessed.

4.12 A third response the Councils might give is that having screened East West Rail in at paragraph 4.16, they are nonetheless entitled to carry out no assessment of it at all because there is not yet sufficient information available to do so. That response does not survive scrutiny either, for three reasons.

4.13 First, the staged approach permitted in *R (Together Against Sizewell C Ltd) v Secretary of State for Energy Security and Net Zero* [2023] EWCA Civ 1517; [2024] Env LR 22[19] does not assist the Councils, because it is not available on these facts. The Court of Appeal held that assessment of cumulative effects may lawfully await a later consenting stage only *'where the cumulative effects in question are not yet capable of being sufficiently identified for proper assessment at the consenting stage for the first project because the second is still unidentified*' – and that, conversely, assessment *'should, in principle, be carried out as soon as the effects which the project in question is likely to have on a protected site are sufficiently identifiable.*' East West Rail is not unidentified: it has a published preferred route, a published station location, four rounds of public consultation since 2019, and a Development Consent Order application anticipated in 2027[10]. The precondition for lawful staging is not met. There is also a considerable amount of information that has been released under EIR from EWRCo. and Natural England and available on Whatdotheyknow.com (search under Euan Dunn and Leigh Carter).

4.14 Second, even where information genuinely is lacking, the lawful response is not to omit the assessment. In *Oceana UK v Secretary of State for Energy Security and Net Zero and Oil and Gas Authority (t/a North Sea Transition Authority)* [2025] EWHC 3146 (Admin)[20], Mould J held that an assessor facing insufficient information *'may well conclude that it is not yet possible to make a meaningful assessment of the likely effects*' – not that the assessor may conclude there is no effect. Paragraph 5.23 does not say the Councils cannot yet conclude; it says there will be 'no adverse effects'. If the true position were that there is insufficient information to assess East West Rail's effects, the lawful conclusion under the precautionary principle would be that no adverse effect cannot presently be excluded (see Section **7** below) – not the unconditional 'no adverse effect' finding actually reached.

4.15 Third, the premise that there is insufficient information is itself doubtful. Substantial, directly relevant evidence already exists: East West Rail Company's 2020 and 2022 radio-tracking, and 2020 transect and static detector surveys[2]; the Vine (2002) study of barbastelle foraging range from the SAC; and evidence from the Wensum Valley Barbastelle Project [20a] directly relevant to the effectiveness of the green bridges and crossing structures East West Rail currently proposes as mitigation. On pp.74-75 of this study we find: '*Conclusion: the barbastelle-specific evidence indicates that they* ***avoid green bridges*** *and there is a lack of other evidence to indicate that the proposed green bridges would be effective in significantly reducing barbastelle vehicle collision risk or the barrier effect… Conclusion: the available evidence suggests that* ***underpasses may not be effective*** *in helping barbastelles to avoid vehicle collisions or in reducing the barrier effect (and even if effective, insufficient in number to cover all likely crossing points)*' [20a] EWRCo. are clearly proposing green bridges and underpasses for their railway in the vicinity of the Eversden and Wimpole Woods SAC. SCDC clearly had enough information to screen EWR in and to make quite a detailed response to the EWR 2026 Non Statutory consultation (see **1.6**). This is not a case where nothing is known; it is a case where a considerable body of relevant evidence exists and has not been brought into the Councils' assessment.

4.16 In any event, if information genuinely is missing, that is not a gap the Councils are powerless to close. East West Rail Company has been conducting systematic radio-tracking surveys of barbastelle bats along the prospective route since 2020 [2] – six years before this consultation, building on survey activity going back to at least 2019 – and holds a substantial body of survey data beyond what has so far been made public. It is open to East West Rail Company, at any time, to provide the Councils with the evidence

needed to support a robust assessment of its effects on the SAC, if it wishes its project to continue to be relied upon to justify this Plan's housing strategy for Cambourne and Cambourne North. It has not done so. An absence of information cannot be relied upon as a reason to omit the assessment altogether when the party best placed to supply that information – and with every incentive to do so, given the Local Plan's dependence on its scheme (see Section **3** above) – has simply chosen not to or is it that GCSP simply has not asked.

4.17 The suggestion that there is insufficient information about this population is also difficult to reconcile with East West Rail Company's account of its evidence base. At a meeting between East West Rail Company and Cambridge Approaches on 14 March 2026, Tristan Lincoln-Gordon – East West Rail Company's Head of Environment – is recorded in Cambridge Approaches' contemporaneous note of that meeting as stating that this area *'would be the most studied for barbastelles anywhere'*, with monitoring ongoing for '4+ years' by that date. When shown peer-reviewed evidence that barbastelles do not reliably use bat bridges or underpasses and asked to share a German study he said showed the contrary, Mr Lincoln-Gordon declined, stating that East West Rail Company was *'under no legal obligation to do so'*. That is, on Cambridge Approaches' contemporaneous account, both a direct acknowledgment from the officer responsible for East West Rail Company's environmental strategy that substantial survey information already exists, and a direct refusal to share evidence said to support its proposed mitigation when specifically asked for it. It turned out that the German study (to which we assume Lincoln-Gordon was referring) of a green bridge did not involve barbastelle bats.

4.18 Nor should the absence of shared data between East West Rail Company and the Councils be allowed to prejudice what is the appropriate habitats regulations assessment for the Local Plan. East West Railway Company Limited is wholly owned by the Department for Transport and was established to deliver a project that the Government's policy treats as integral to the growth of this area – the same growth the Local Plan itself relies upon East West Rail to deliver (see **3** above). The Councils are, equally, public authorities exercising statutory functions in the public interest. Neither is withholding confidential information from an unconnected private party; both are public bodies, and the Planning Inspectorate's guidance already expects coordination between them (see **4.8** above). **A failure by one part of government to share environmental evidence with another should not be capable of lowering the standard of protection the legislation requires for a Special Area of Conservation.**

4.19 <Intentionally Left Blank>.

5. This is not a new point – and the Councils' evidence undermines their conclusion

5.1 This is not the first time this point has been raised. Appendix F.11[6] records that the same substantive objection was made at Regulation 18 stage by Cambridge Approaches, Haslingfield Parish Council, Great Shelford Parish Council and a private respondent, and that both South Cambridgeshire District Council and Cambridgeshire County Council have themselves separately raised significant concerns about EWR's impact on the SAC's maternity roost in their responses to EWR Co's non-statutory consultations. The Councils' response to these representations at Appendix F.13–F.14 does not engage with the substance of the objection; it confirms that consultation has taken place with EWR Co's habitats regulations assessment team, and that the Local Plan's mitigation is not intended to address EWR's effects, without explaining how or when the in-combination effect will actually be assessed and, if necessary, mitigated and secured.

5.2 The inconsistency in the Councils' document reinforces the point. At paragraphs 6.5–6.11[6], the July 2026 HRA candidly acknowledges that adverse effects from air pollution 'cannot be ruled [out]' pending further air quality modelling, and commits to producing an addendum, with any necessary mitigation

'*tested and secured (e.g. in policy wording) prior to the adoption of the Local Plan.*' No equivalent treatment is applied to the Eversden and Wimpole Woods SAC/EWR in-combination effect, despite the underlying uncertainty being at least as significant – arguably more so, given the SAC supports what is described in the Councils' consultation responses to EWRCo. as a nationally important, potentially irreplaceable barbastelle maternity colony. Chapter 6 ('Next steps') of the July 2026 HRA does not list this issue as outstanding, which indicates the Councils currently regard it as resolved. On the evidence in their document, it is not.

5.3 Despite this, sustained attempts by Cambridge Approaches and Haslingfield Parish Council to engage the Councils' officers directly on this point have not succeeded. The concern was formally raised at Haslingfield Parish Council on 8 December 2025, when Cllr Redrup (South Cambridgeshire District Council) agreed to try to facilitate discussion between the Local Plan team and the EWR team within the Council. By 9 March 2026, the Parish Council's minutes record that no meeting had yet been arranged with Cambridgeshire County Council, whose member, Cllr Damary-Homan, explained that the County Council could not share information at that stage owing to its consultee status, but that a meeting could take place after the consultation closed. A further direct request for a meeting between Cambridge Approaches' ecological experts and the relevant officers was made to Cllr Damary-Homan on 26 March 2026. As of the Parish Council's most recent minutes (13 July 2026), engaging with the County Council remained an item still 'to discuss at a future meeting' – no meeting between the Councils' HRA/ecology officers and either the Parish Council or Cambridge Approaches had taken place, more than seven months after the concern was first raised.

6. Consequence for legal compliance and soundness

6.1 Because the plan-level Appropriate Assessment does not lawfully exclude adverse effects on the integrity of Eversden and Wimpole Woods SAC when the Local Plan is considered in combination with East West Rail, the HRA does not satisfy Regulation 105. The Local Plan is accordingly not legally compliant.

6.2 For the same reason the Local Plan is not justified (the housing strategy for Cambourne and Cambourne North is not founded on a proportionate and robust evidence base as to its ecological effects) and not effective (the 'no adverse effect' conclusion, and by extension the deliverability of the S/CBN and related allocations as currently drafted, is not demonstrated, since it fails to address the interaction with EWR).

6.3 We have taken advice from specialist planning counsel, and this representation incorporates his advice.

Please provide a 100 word summary of your representation.

This representation objects to the Local Plan's HRA, which omits EWR's in-combination effects on Eversden and Wimpole Woods SAC's barbastelle bat colony, despite the Councils' screening chapter saying this would be examined at Appropriate Assessment stage. Citing Regulation 105, the Habitats Directive and case law including *Waddenzee*, *Moorburg* and *Caffyn,* Cambridge Approaches argues this omission makes the Plan legally non-compliant, unjustified and ineffective, and should not be adopted until resolved.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Endnotes

1. Conservation of Habitats and Species Regulations 2017 (SI 2017/1012), regulation 105 (Part 6, Chapter 8: 'Land Use Plans'). Full text: https://www.legislation.gov.uk/uksi/2017/1012/regulation/105/made

2. Case C-127/02 *Landelijke Vereniging tot Behoud van de Waddenzee v Staatssecretaris van Landbouw, Natuurbeheer en Visserij* [2004] ECR I-7405 (CJEU, 7 September 2004) — source of the 'no reasonable scientific doubt' test for concluding no adverse effect on site integrity. A CJEU judgment arising from a reference by the Dutch Council of State; retained/assimilated case law in the UK, consistently applied by UK courts since.

3. Case C-258/11 *Sweetman v An Bord Pleanála,* EU:C:2013:220 (CJEU, 11 April 2013) — applying and refining the Waddenzee test. A CJEU judgment arising from a reference by the Irish Supreme Court (An Bord Pleanála is Ireland's planning appeals board); retained/assimilated case law in the UK, consistently applied by UK courts since.

4. *R (Champion) v North Norfolk District Council* [2015] UKSC 52 — on the circumstances in which detailed assessment may lawfully be deferred to a later stage of the same consent process.

5. *Wealden District Council v Secretary of State for Communities and Local Government* [2017] EWHC 351 (Admin) — on the duty to assess in-combination effects of reasonably foreseeable projects at plan-making stage.

6. Habitats Regulations Assessment of the Greater Cambridge Local Plan (LUC, Final report, July 2026), prepared for Cambridge City Council and South Cambridgeshire District Council for the Regulation 19 ('Proposed Submission') consultation: https://www.greatercambridgeplanning.org/media/3zdjqdus/habitats-regulations-assessment-of-greater-cambridge-local-plan.pdf .

7. Cambridge City Council, report to the Performance, Assets and Strategy Overview and Scrutiny Committee, 'Draft Greater Cambridge Local Plan for consultation (Regulation 18), and Update of Local Development Scheme' (4 November 2025), section 4.6 'Key issues impacting the Local Plan process': https://democracy.cambridge.gov.uk/documents/s70952/CCC_Scrutiny_Report_GCLP_Oct_2025.pdf

8. Draft Greater Cambridge Local Plan, Regulation 18 consultation, Policy S/CBN ('Cambourne North') and supporting text: https://consultations.greatercambridgeplanning.org/draft-greater-cambridge-local-plan-consultation/site-allocations/new-settlements/policy-scbn ; Policy S/CB ('Cambourne') and supporting text: https://consultations.greatercambridgeplanning.org/draft-greater-cambridge-local-plan-consultation/site-allocations/new-settlements/policy-scb

9. Conservation of Habitats and Species Regulations 2017 (SI 2017/1012), regulation 63 (Part 6, Chapter 1) — the general 'plans or projects' assessment duty applicable to project-level consents such as a Development Consent Order under the Planning Act 2008 (c. 29): https://www.legislation.gov.uk/uksi/2017/1012/regulation/63/made

10. East West Rail Company, route-wide public consultation, 14 April – 9 June 2026, held ahead of an anticipated Development Consent Order application in 2027; see also Cambridge City Council, 'East West Rail – Development Consent Order', report to the Planning and Transport Scrutiny Committee: https://democracy.cambridge.gov.uk/documents/s67666/EWR%20NSC%20-%20Planning%20Transport%20Scrutiny%20Committee%20-%20Committee%20report.pdf

11. Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora ('the Habitats Directive'), Article 6(3), which Regulation 105 transposes into domestic law: 'Any plan or project not

directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives.'

12. Case C-142/16 *European Commission v Federal Republic of Germany ('Moorburg'),* EU:C:2017:301 (CJEU, Second Chamber, 26 April 2017) — Germany found in breach of Article 6(3) of the Habitats Directive for authorising the Moorburg coal-fired power station on the basis of an assessment of its effects (mitigated by proposed fish ladders) on protected fish populations in the Elbe considered on its own, without combining them with the effects of the existing upstream Geesthacht pumped-storage plant on the same population.

13. *R (Wyatt) v Fareham Borough Council* [2022] EWCA Civ 983 — Court of Appeal authority on the 'no reasonable scientific doubt' standard for Habitats Regulations appropriate assessments and the weight to be given to evidenced, secured consultation with Natural England.

14. Case C-461/17 *Holohan and Others v An Bord Pleanála,* EU:C:2018:883 (CJEU, Second Chamber, 7 November 2018), in particular paragraphs 33 and 40 — on the requirement that an Appropriate Assessment be free of lacunae and contain complete, precise and definitive findings and conclusions capable of dispelling all reasonable scientific doubt, and that all aspects of a plan or project capable of affecting a site's conservation objectives, either alone or in combination with other plans or projects, must first be identified in the light of the best scientific knowledge in the field.

15. Planning Inspectorate, 'Nationally Significant Infrastructure Projects: Advice on Habitats Regulations Assessments' (first published 20 September 2024, last updated 11 August 2026), sections 'Stage 1: Screening for likely significant effects' and 'Co-ordinating parallel consents and other appropriate assessment': https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-habitats-regulations-assessments

16. East West Rail Company, 'Approaching Cambridge' (factsheet accompanying the May 2023 Route Update Announcement): https://ewr-production-files.s3.eu-west-2.amazonaws.com/public/ListsBlockMedia/45b2de01d3/03.-RUA-Approaching-Cambridge-v4.pdf — confirming that both northern and southern approaches to Cambridge were assessed as technically viable, on a comparison covering impact on developments, traffic and connectivity, future capacity, freight, and environmental considerations, and that the southern route was preferred because it serves Cambridge South station and the Cambridge Biomedical Campus.

17. *R (Caffyn) v Shropshire Council [2025]* EWHC 1497 (Admin); [2026] PTSR 104, King's Bench Division, Fordham J, judgment 17 June 2025, at para 61(i) and (iv) — on the duty under regulation 63(1)(a) of the Conservation of Habitats and Species Regulations 2017 to assess in-combination effects of projects consented by a different competent authority, and rejecting the argument that a 'vertical division of labour' between consenting bodies limits the scope of that duty.

18. *R (Foster) v Forest of Dean District Council [2015]* EWHC 2648 (Admin), Cranston J, 22 September 2015, at [15] — on the absence of any obligation to assess in-combination effects where the Appropriate Assessment finds no residual effect from the plan or project alone, that finding being supported by Natural England.

19. *R (Together Against Sizewell C Ltd) v Secretary of State for Energy Security and Net* Zero [2023] EWCA Civ 1517; [2024] Env LR 22 (Court of Appeal, 20 December 2023), on appeal from Holgate J [2023] EWHC 1526 (Admin) — on the lawfulness of a staged approach to assessing cumulative effects, and the precondition that the second project be 'not yet... sufficiently identified' before assessment can lawfully be deferred.

20. *Oceana UK v Secretary of State for Energy Security and Net Zero and Oil and Gas Authority (t/a North Sea Transition Authority)* [2025] EWHC 3146 (Admin), Mould J, 28 November 2025 — on the lawful response to insufficient information for a meaningful in-combination assessment, namely that a meaningful assessment is 'not yet possible', not that no effect can be assumed.

20a. Wensum Valley Barbastelle Project and the Proposed Norwich Western Link. https://gat04-live-1517c8a4486c41609369c68f30c8-aa81074.divio-media.org/filer_public/4a/ae/4aae55c3-0585-419e-bbae-eedf9f149494/cd18-15_wild_wings_ecology_ltd_university_of_east_anglia__norfolk_wildlife_trust_2024__wensum_valley_barbastelle_project__the_proposed_norwich_western_link_2018_-_2023_report.pdf

21-22. <Intentionally Left Blank>.

23. SCDC Response to EWR 2026 Non Statutory Consultation https://www.greatercambridgeplanning.org/media/yyklrcgo/ewr_public-consultation-spring-2026_south-cambridgeshire-district-council.pdf

24.https://www.whatdotheyknow.com/request/barbastelle_bat_radio_tracking_r_3/response/2906730/attach/3/EWR%20Ref%20TBC%20Radiotracking%20Report%20V1.5%2012092023%20redactapplied.pdf?cookie_passthrough=1

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

7. Proposed Modifications

7.1 Cambridge Approaches does not seek to prescribe the mechanism by which the Councils close the gap identified above. What Regulation 105 does not permit is what the Local Plan currently does – relying on East West Rail to justify the scale, density and vision of the Cambourne and Cambourne North allocations while excluding East West Rail's effects from the Local Plan's Appropriate Assessment for its HRA. Whichever mechanism the Councils adopt, it must satisfy two conditions: the evidence relied upon must actually assess East West Rail's in-combination effect on the SAC, and that evidence must be tested through the same public process as the rest of the Plan's evidence base, not introduced or relied upon after independent examination has closed, when it can no longer be scrutinised or challenged.

7.2 One way of meeting those conditions would be for the Councils to obtain, or otherwise secure, an adequate assessment of East West Rail's effect on the SAC – whether EWR Co.'s habitats regulations assessment once available, before the Local Plan's Appropriate Assessment records 'no adverse effect' on the SAC (paragraph 5.23[6]). Cambridge Approaches does not prescribe that this is the only way, or the procedural route by which it must be done; the essential point, whatever course is taken, is that this should be treated in Chapter 6 ('Next steps') as an outstanding matter requiring resolution before adoption, exactly as air quality is currently treated at paragraphs 6.5–6.11, and that any evidence relied upon is capable of being tested by interested parties before the Local Plan is adopted.

7.3 If it cannot be shown that the southern route's effect on the SAC can be adequately mitigated, the housing trajectory for Cambourne and Cambourne North should not assume delivery of the railway until that question is resolved. Cambridge Approaches offers two further observations as suggestions, not as a prescribed way forward: greater openness from East West Rail Company about the evidence it already

holds would materially assist in closing this gap; and EWR Co.'s published material confirms that a northern approach to Cambridge was found 'technically viable'[16], which, if it avoided the SAC to a greater degree than the southern route, would remove much of the difficulty addressed in this representation. Cambridge Approaches does not have access to the detailed evidence needed to say more than this, and does not put forward a preferred mechanism beyond these observations. We note that Natural England's advice in the early consultations with EWRCo. gave a strong steer that the northern approach to Cambridge for EWR might be preferrable from an environmental standpoint.

7.4 If reliance is placed on an assessment of East West Rail's effects obtained under **7.2** above, that evidence should be tested and secured (e.g. through a Statement of Common Ground with EWR Co, comparable to that already reached with Anglian Water on wastewater treatment capacity at HRA paragraphs 5.100–5.104[6]) before adoption, not left to a future, unsecured process.

8. Conclusion

8.1 For the reasons set out above, we object to the Proposed Submission Greater Cambridge Local Plan on the grounds that it relies on East West Rail to justify the scale, density and vision of the Cambourne and Cambourne North allocations, while the July 2026 HRA fails to meet legal requirements to assess East West Rail's effect on Eversden and Wimpole Woods SAC, contrary to Regulation 105. The Councils cannot rely on East West Rail for one purpose while disclaiming it for the other. We do not prescribe the mechanism by which that gap should be closed; greater openness from East West Rail Company about the evidence it already holds, and the alternative of a northern approach to Cambridge that EWR Co has itself described as technically viable, are both matters the Councils could usefully pursue, but we put forward no preferred way forward beyond that. What Regulation 105 does not permit is adoption of the Local Plan while that gap remains. We ask that the Proposed Submission Greater Cambridge Local Plan should not be adopted, until East West Rail's in-combination effects on Eversden and Wimpole Woods SAC have been properly and openly assessed at Appropriate Assessment stage. Failing that, we ask that the Planning Inspector be asked to consider this as a legal compliance and soundness matter. We wish to be notified of further stages in the preparation of the Local Plan and to participate in any hearing session dealing with this matter at the examination in public.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

The position of the GCLP team on this matter does not appear to be close to the one explained in this representation and we have not managed to meet them. Therefore, some discussion at these hearings is necessary.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes