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	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.

This representation is separate from, and additional to, Cambridge Approaches' representation on the Habitats Regulations Assessment's treatment of East West Rail. It concerns a different, independent gap in the same HRA: its treatment of Hardwick Wood and the barbastelle population associated with it. The two representations should be read together but stand independently – either point, on its own, supports the conclusion that the HRA's 'no adverse effect' conclusion for Eversden and Wimpole Woods SAC at paragraph 5.23 is not safely reached.

Document and paragraph to which this representation relates:
Habitats Regulations Assessment of the Greater Cambridge Local Plan (LUC, Final report, July 2026), Appendix E (site-level ecological review for Policy S/SEA/BA: Bourn Airfield Strategic Enhancement Area) and Chapter 5, paragraphs 5.63–5.68 (Appropriate Assessment: Eversden and Wimpole Woods SAC – recreation pressure); and Policy BG/BG (Biodiversity and Geodiversity) insofar as it does not address barbastelle foraging resource shared between Hardwick Wood and Eversden and Wimpole Woods SAC.

1. The SAC's barbastelle population is not confined to Eversden and Wimpole Woods

1.1 The Habitats Regulations Assessment treats Eversden and Wimpole Woods SAC as though it supports an isolated barbastelle population whose habitat requirements can be fully captured by a Core Sustenance Zone and Landscape Connectivity Zone drawn outward from the SAC boundary alone[1]. East West Rail Company's 2022 radio-tracking survey – obtained by Cambridge Approaches under the Freedom of Information Act and publicly available – establishes that this is not the ecological reality. That survey confirms separate barbastelle maternity colonies at Madingley Wood SSSI, Hardwick Wood SSSI and Waresley and Gransden Wood SSSI, and states in terms: '*The surveys did however indicate that foraging resources are shared by the Madingley Wood SSSI, Hardwick Wood and Eversden and Wimpole Woods SAC barbastelle maternity colonies*.'[2] The SAC's qualifying population therefore depends, for its foraging resource, on land beyond what the HRA's own methodology treats as relevant.

1.2 This matters because Hardwick Wood lies close to, and shares a foraging landscape with, several of the Local Plan's own site allocations and policy areas in this part of South Cambridgeshire. A foraging resource used in common by more than one maternity colony is, by definition, more sensitive to incremental loss than the HRA's site-by-site, SAC-radius methodology assumes: pressure on that shared resource affects not only Hardwick Wood's own colony but the pool of foraging habitat the SAC's colony also depends on.

2. The Councils' evidence shows awareness of the Hardwick Wood connection, without it being carried into the assessment

2.1 Appendix E to the HRA, in its site-level review of Policy S/SEA/BA (the Strategic Enhancement Area adjoining Bourn Airfield New Village), records under 'Functional connectivity': "The hedgerows and woodland provide good connectivity to the wider area, such as Hardwick Wood to the southeast."[3] The accompanying figure shows commuting-corridor lines running toward Hardwick Wood. Hardwick Wood is therefore already present in the Councils' evidence base as a site with functional connectivity to the assessed area – but nowhere does the HRA identify Hardwick Wood as itself supporting a barbastelle maternity colony or ask whether development affecting that connectivity could affect a foraging resource shared with the SAC.

2.2 The Appendix E entry for S/SEA/BA appears, on the face of it, to describe the functional connectivity of the site being assessed rather than the SAC's connectivity requirements – the two are conflated in a way that risks the significance of the Hardwick Wood link being lost from the assessment altogether. Cambridge Approaches does not suggest this was anything other than an oversight, but it is one with real consequences: it means the Councils had, in their evidence base, a documented link to Hardwick Wood, and did not follow that link through to the maternity roost and shared foraging resource that East West Rail Company's survey had already identified by the time the Regulation 19 HRA was prepared.

3. East West Rail Company's Public Facing illustrates the population's significance, without disclosing it

3.1 East West Rail Company's 2026 consultation brochure includes the following, in relation to a proposed bridge near Hardwick Road: '*This bridge would include a planted section to provide habitat connectivity for mammals, including barbastelle bats. It would allow wildlife to move between Hardwick Wood Site of Special Scientific Interest, ancient woodland, and foraging habitat to the east.*' [4] This passage describes mitigation for a generic connectivity concern. It does not disclose that Hardwick Wood supports a confirmed barbastelle maternity colony, or that this is what the mitigation is actually there to protect. A reader of the consultation brochure alone would have no way of knowing that a specific, located maternity roost – not a generic habitat corridor – lies behind this proposal.

3.2 Cambridge Approaches raises this not as a criticism of the Local Plan's HRA directly – East West Rail Company is a separate body with its own consultation obligations – but because it illustrates the point made in Section 1 above: the ecological significance of this part of the landscape is established and known, from the promoter's survey work, and has not found its way into the Greater Cambridge Local Plan's assessment.

4. Recreation and visitor pressure on the shared foraging resource is not assessed anywhere in the HRA

4.1 The HRA does contain a dedicated Appropriate Assessment of recreation pressure on Eversden and Wimpole Woods SAC, at paragraphs 5.63–5.68[1], concluding that adverse effects will be avoided through Policy BG/EO and the Bourn Airfield site policy's landscaping and open space requirements. Cambridge Approaches does not take issue with that assessment on its own terms.

4.2 What is absent is any assessment of recreation or visitor pressure on Hardwick Wood SSSI itself. This is not, in isolation, a gap in the HRA's legal scope: Hardwick Wood is not a European site, and the Habitats Regulations do not of themselves require it to be assessed as such. But given the shared foraging resource identified in Section 1 above, increased visitor pressure on Hardwick Wood – arising from the cumulative effect of the housing growth planned across this part of South Cambridgeshire, including but not limited to the Bourn Airfield and Cambourne allocations – is capable of affecting habitat that the SAC's qualifying population also relies upon. That is a functionally-linked-habitat question the HRA's conservation objectives for the SAC ought to capture and does not.

5. Wider context: Natural England has already identified suitable foraging resource in this area as scarce

5.1 Natural England's response to the 2018 First Proposals consultation on the Local Plan recorded: "Natural England is reviewing the Impact Risk Zone (IRZ) for Eversden and Wimpole Woods SAC to take into account the findings of emerging SAC barbastelle tracking surveys being undertaken for major development schemes. It will also take into consideration the availability of suitable foraging resource which is considered to be quite scarce in the local area."[5] Cambridge Approaches relies on this as context, not as a freestanding ground of objection: it supports treating the loss of any part of a shared foraging resource – including the resource shared with Hardwick Wood identified above – as significant, rather than assuming that a scarce resource can absorb incremental loss without cumulative consequence.

6. Public Domain Material which may assist GCSP's HRA

6.1 This section introduces public domain material which GCSP should use in its HRA including for in combination assessment with EWR. You should search for Leigh Carter and separately Euan Dunn on whatdotheyknow.com. These will produce survey results from EWRCo. and correspondence between EWRCo. and Natural England on the subject of the Eversden and Wimpole Wood SAC. Look in particular at the evidence plan meetings in which Natural England express concern about the quality of the evidence that EWRCo. are producing.

6.2 EWRCo.'s 2022 Barbastelle Radio-Tracking Survey Report[6] is key public domain material. This includes the following sections that are relevant to the Barbastelle Bats roosting in the Eversden and Wimpole Woods SAC: §§3.2.4-3.2.9, §§3.4.6-3.4.7, §4.2. §4.2.10 states '*The radio-tracking surveys undertaken in August and September 2022 did not therefore provide evidence that the breeding colonies at Madingley Wood SSSI, Hardwick Wood SSSI and Waresley and Gransden Wood SSSI directly interact with the Eversden and Wimpole Woods SAC barbastelle maternity colony with respect to the interchanging of roosting.* ***The surveys did however indicate that foraging resources are shared by the Hardwick Wood SSSI colony, Madingley Wood SSSI colony and the Eversden and Wimpole Woods SAC population***.'

6.3 The tracking report referred to in §6.2 has the maps at the end redacted. We did get these maps in a very large file on appeal. They are very interesting and are available from us on request.

Please provide a 100 word summary of your representation.

This representation objects to the Greater Cambridge Local Plan's HRA on a separate ground from the East West Rail In combination submission: it fails to identify that Hardwick Wood supports its own barbastelle maternity colony sharing a foraging resource with Eversden and Wimpole Woods SAC, as confirmed by EWR Company's 2022 radio-tracking survey. The Councils' HRA Appendix E records functional connectivity to Hardwick Wood but never follows this through to the shared foraging resource or assesses recreation/visitor pressure on it from planned housing growth. Cambridge Approaches asks the Inspector to treat this as a soundness matter requiring further HRA work before adoption, and to update the functionally-linked-habitat baseline and Appendix E's Bourn Airfield review accordingly.

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. Habitats Regulations Assessment of the Greater Cambridge Local Plan (LUC, Final report, July 2026): https://www.greatercambridgeplanning.org/media/3zdjqdus/habitats-regulations-assessment-of-greater-cambridge-local-plan.pdf

2. East West Rail Company, 2022 Barbastelle Radio-Tracking Survey Report (file 'EWR Ref TBC Radiotracking Report V1.5 12092023 redactapplied.pdf'), Executive Summary. Released under the Environmental Information Regulations 2004 in response to a Freedom of Information request by Dr Euan Dunn, 'Barbastelle Bat radio-tracking report, Eversden and Wimpole Woods SAC' (ref CS-00209621, requested 6 December 2024, released 5 February 2025): https://www.whatdotheyknow.com/request/barbastelle_bat_radio_tracking_r_3 .

3. Habitats Regulations Assessment of the Greater Cambridge Local Plan, Appendix E, site review of Policy S/SEA/BA: Bourn Airfield Strategic Enhancement Area, page 216, 'Functional connectivity'.

4. East West Rail Company, consultation brochure page 118: https://ewr-production-files.s3.eu-west-2.amazonaws.com/public/Uploads/e3c2df861d/EWR_Consultation-Brochure_18.08.26.pdf

5. Natural England, response to the Greater Cambridge Local Plan First Proposals consultation (2018), page 10: https://oc2.greatercambridgeplanning.org/download/attachment/1795373

6. EWRCo. 2022 Barbastelle Radio-Tracking Survey Report. https://www.whatdotheyknow.com/request/barbastelle_bat_radio_tracking_r_3/response/2906730/attach/html/3/EWR%20Ref%20TBC%20Radiotracking%20Report%20V1.5%2012092023%20redactapplied.pdf.html

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. Modifications sought

7.1 The HRA should be updated to identify Hardwick Wood's barbastelle maternity colony and its shared foraging resource with Eversden and Wimpole Woods SAC as part of the functionally-linked-habitat baseline for the SAC, drawing on East West Rail Company's 2022 radio-tracking survey and any further survey data available from East West Rail Company or the Cambridgeshire and Peterborough Environmental Records Centre.

7.2 The Appropriate Assessment should specifically consider whether recreation and visitor pressure arising from the Local Plan's allocations – individually and cumulatively – is capable of affecting the foraging resource shared between Hardwick Wood and the SAC, and whether the existing mitigation in Policy BG/BG and related policies is sufficient to address that pathway.

7.3 Appendix E's review of Policy S/SEA/BA should be revisited to distinguish clearly between the functional connectivity of the site being assessed and the connectivity and foraging requirements of the SAC's qualifying population, so that documented links of the kind identified in Section 2 above are not lost from the assessment.

8. Conclusion

8.1 For the reasons set out above, we object to the Proposed Submission Greater Cambridge Local Plan on the grounds that its Habitats Regulations Assessment does not properly identify or assess the barbastelle foraging resource shared between Hardwick Wood and Eversden and Wimpole Woods SAC, notwithstanding that this is established by evidence already available to the Councils, including Appendix E and East West Rail Company's 2022 radio-tracking survey. This representation is made in addition to, and independently of, Cambridge Approaches' separate representation on the HRA's treatment of East West Rail's in-combination effect on the SAC. We ask that the Planning Inspector be asked to consider this as a soundness matter requiring further work on the HRA before the Plan is adopted.

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.

To talk about the important material in this representation and debate with GCSP staff why they have not considered it.

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