

**IN THE COURT OF APPEAL**  
**(CIVIL DIVISION)**

**Claim no**

**ON APPEAL FROM THE DIVISIONAL COURT**  
**LEWIS LJ AND HOLGATE J**  
**CO/3024/2020**

**B E T W E E N :-**

**THE QUEEN**  
**on the application of**  
**RIGHTS: COMMUNITY: ACTION**

**Appellant**

**and**

**THE SECRETARY OF STATE FOR**  
**HOUSING, COMMUNITIES AND**  
**LOCAL GOVERNMENT**

**Respondent**

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**GROUNDS OF APPEAL**

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1. The Divisional Court erred in concluding that the three statutory instruments were not required to be subject to Strategic Environmental Assessment because they did not set the framework for future development consent of projects, or modify an existing framework for future development consent of projects.

**PAUL BROWN Q.C.**  
**ALEX SHATTOCK.**  
**Landmark Chambers**  
**4 December 2020**