From:	Raj Gupta
To:	Joanna Vincent
Cc:	Sue Power-Redman; Nikita Sellers
Subject:	RE: THE PROPOSED CAMBRIDGESHIRE COUNTY COUNCIL AND GREATER CAMBRIDGE PARTNERSHIP - CAMBRIDGE SOUTH EAST TRANSPORT ORDER [GATELEY-CONSULTANCY.FID150322]
Date:	10 November 2026 15:50:27

Dear Joanna

As you are aware we act for David Chalk, William Chalk and Mark Trafford KC (OBJ 436) and write further to the Inspector's amended note of the pre-inquiry meeting dated 2 November 2026.

In our letter to the Inspectors attached to our email to you of 12 October 2026, we reserved the right to attend the inquiry in order to cross-examine the Applicant's witnesses. We confirm that our client wishes to cross-examine James Franklin who we understand is giving evidence on behalf of the Applicant on compulsory purchase issues. We anticipate that around 90 minutes would be required for such cross-examination.

We had hoped that an appearance by our clients would be unnecessary given that heads of terms had been largely agreed by the parties (following more than two years of negotiation between them) which would allow our clients to withdraw their objection. Regrettably, we have now been provided with an agreement drafted by the Applicant's solicitors which has little regard to the heads of terms agreed. Amongst the many significant changes to the heads of terms, the draft agreement:

- Prohibits the construction of any building, works of any kind or tree planting on any part of our client's land without the Applicant's consent including land not within the order limits;
- Seemingly allows the Applicant to unilaterally acquire land outside the agreed plan by way of amendments to the Final Plans;
- Allows the Applicant to use land owned by our clients not just for materials storage (as agreed in the heads of terms) but for enabling works;
- Provides for the Applicant to access all of our clients' land (including land outside of the Order limits) for works and surveys;
- Does not include the Applicant's obligation to amend the Order as agreed in the heads of terms;
- Removes the Applicant's obligation to not object to our client's planning applications as was agreed to exercise Order powers in consideration of the agreement; and
- Allows the Applicant to terminate the agreement unilaterally at its discretion.

We further note the deadline for the provision of statements of common ground set

out in the Inspectors' pre-inquiry note is 10 November 2026. We have not received a draft or indeed any communication from the Applicant's solicitors in relation to any such statement.

Raj Gupta
Partner

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From: Joanna Vincent <Joanna.Vincent@gateleybe.com>
Sent: 02 November 2026 15:43
To: Joanna Vincent <Joanna.Vincent@gateleybe.com>
Cc: Sue Power-Redman <Sue.Power-Redman@gateleybe.com>
Subject: THE PROPOSED CAMBRIDGESHIRE COUNTY COUNCIL AND GREATER CAMBRIDGE PARTNERSHIP - CAMBRIDGE SOUTH EAST TRANSPORT ORDER [GATELEY-CONSULTANCY.FID150322]

Dear Sir/Madam

UPDATE

THE PROPOSED CAMBRIDGESHIRE COUNTY COUNCIL AND GREATER CAMBRIDGE PARTNERSHIP - CAMBRIDGE SOUTH EAST TRANSPORT ORDER

Ref: TWA/25/APP/01

Following the circulation of the Pre-Inquiry Meeting summary note on Thursday, 29th October the Inspectors have issued a slightly amended version to provide further clarity on some points, please see attached.

All information regarding the Inquiry can be found here **CSET - Inquiry Website** and will be continuously updated prior to, during and post Inquiry.

If you have any queries, please do not hesitate to contact us.

Kind regards

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