

20 June 2025

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Our ref:
RG1/ECD1/470360.1
Your ref:
DPI/E0535/25/1

Dear Sirs

**The Cambourne to Cambridge Order (REF: DPI/E0535/25/1)
Pre-inquiry meeting on Tuesday 24 June 2025**

We are writing to set out a number of points which our client, Cambridgeshire County Council (the **Applicant**), hopes will assist the Inspectors at the Pre-Inquiry Meeting taking place on Tuesday 24 June 2025.

1. EXPERT WITNESSES TO BE CALLED FOR THE APPLICANT

- 1.1 Please find the Applicant's list of appearances for the forthcoming inquiry enclosed. We can also make available to the Programme Officer a schedule containing availability for both our Leading and Junior counsel (Neil Cameron KC and Matthew Henderson of counsel respectively) as well as the Applicant's Expert Witnesses if this would assist.

2. INQUIRY TIMETABLING

- 2.1 We are mindful that the inquiry duration is expected to last for a number of months and that this is a significant time commitment for those parties actively involved in the inquiry. A number of inquiry participants may also be involved in preparation of evidence for the Cambridge South East Transport Scheme (**CSET**) for which a confirmed inquiry date is awaited. In order to facilitate an efficient timetable as well as minimise inquiry time commitments for participants as far as practicable, the Applicant proposes that the Inquiry is split into three blocks which correspond with the scheduled inquiry dates as follows:

- 2.1.1 **Block 1 (Tuesday 16 September to Friday 3 October 2025)** during which the Applicant would propose to present its case and there would be an opportunity for third parties to cross-examine the Applicant's witnesses. The Applicant would not propose to re-call its witnesses unless there was a need to do so in response to site specific or other matters raised during Blocks 2 or 3. We would propose that Block 1 also deals with evidence on behalf of the Greater Cambridge Shared Planning Service.
- 2.1.2 **Block 2 (Tuesday 14 October to Friday 24 October 2025)** during which third parties who raise scheme wide objections can present their evidence and be cross-examined. We understand from Richard Buxton Solicitors that witnesses on behalf of Cambridge Past Present and Future and Coton Parish Council wish to present their evidence

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between 1 October and 17 October (noting that 6 to 10 October is a non-sitting week) and therefore would be available at the end of Block 1 and start of Block 2. This would align with our suggested approach and, depending on precise timings from the parties, could be brought forward to commence at the end of Block 1. To avoid the need for these parties to re-attend at a later date, we would propose that closings from those parties also takes place in Block 2.

- 2.1.3 **Block 3 (Tuesday 4 November to Friday 21 November 2025)**, which we suggest is programmed for evidence to be given by third parties raising site specific objections. Once all parties had been heard, Block 3 would also be available to discuss planning conditions and hear the Applicant's closing submissions.

- 2.2 This approach would enable participants to attend for those sessions of the inquiry which they consider relevant to them, reducing the necessity for full attendance and the associated costs and inconvenience of this for parties. For ease of reference, we have set this out as a preliminary programme in the table below:

Session	Dates	Suggested Programme
Block 1	Tuesday 16 September to Friday 3 October 2025	Openings Applicant's case and cross-examination of Applicant's witnesses Greater Cambridge Shared Planning Service's case and cross-examination
	Monday 6 October to Friday 10 October	Non-sitting week
Block 2	Tuesday 14 October to Friday 24 October 2025	Third parties raising scheme wide objections, e.g. CPPF and CPC and cross-examination Closings for Block 2
	Monday 27 October to Friday 31 October	Non-sitting week
Block 3	Tuesday 4 November to Friday 21 November 2025	Third parties raising site specific objections, e.g. Clare Hall and cross-examination Conditions Applicant's Closings

3. EXCHANGE OF PROOFS OF EVIDENCE

- 3.1 In order to allow for the smooth running of the inquiry and particularly to avoid the need to recall witnesses given the programme suggested above, we would propose that all parties' evidence is exchanged in accordance with the usual inquiry rules, 4 weeks prior to the opening of the inquiry with any rebuttals being served 2 weeks prior to the opening of the inquiry.
- 3.2 Given the number of parties taking an active role in the inquiry as well as the number of expert witnesses who will appear at the inquiry, we would be most grateful if the Inspectors would agree to depart from the requirement for parties to exchange hard copy proofs of evidence via post and instead, permit electronic exchange for proofs of evidence, appendices and summary proofs. This will reduce paper consumption and cost for all parties. It is of course noted that the Inspectors will require hard copies of certain documents, plans and proofs of evidence, which the Applicant is willing to provide.
- 3.3 We would be grateful if the process for electronic exchange of evidence could be discussed and agreed at the Pre-inquiry Meeting. It may be that proofs of evidence can simply be sent to the programme officer to be uploaded at the same time on the inquiry website.

4. STATEMENT OF MATTERS

- 4.1 The Secretary of State's Statement of Matters, enclosed with the letter dated 22 May 2025, states, at item 2, that the Secretary of States wishes to be informed of *"Whether all statutory procedural requirements have been complied with"*. To address this, we have prepared a procedural note which is enclosed. Should the Inspectors (or any parties) have any further questions in relation to this matter, we would be happy to assist.

5. INSPECTOR SITE INSPECTIONS

- 5.1 We have attached a map at **Appendix 1** which identifies our client's proposed locations for the accompanied site inspection. The locations are numbered (1 to 11) which is our client's suggested order for any itinerary, starting with Rifle Range and ending at Cambourne Town Centre. We anticipate approximately 4 to 5 hours will be required to visit these locations.
- 5.2 We would be grateful for the Inspectors and parties' comments on whether any locations should be removed or added, or whether there are any constraints on timings following which our client would be willing to provide a suggested detailed itinerary. We would also be grateful if a date and numbers of attendees can be confirmed so that our client can make the necessary transport and practical arrangements ahead of the opening of the inquiry.

6. UPDATES TO THE BOOK OF REFERENCE

- 6.1 The Applicant is aware of title changes that have occurred since the submission of the application or are likely to occur prior to the close of the inquiry. Therefore, in the usual way, the Applicant will undertake exercises to refresh of the Book of Reference at set times. The Applicant intends to submit an updated Book of Reference (i) prior to the opening of the inquiry and (ii) shortly before the close of the inquiry.
- 6.2 In the meantime, it has come to our attention that Aquila Investments Limited (Aquila) occupies part of the Order Limits and was not included in the Book of Reference or, therefore, formally notified of submission of the application. This has since been remedied, by letter dated 6 June 2025. Aquila is a company managing certain agricultural land held by St John's College, and its registered office is St John's College, which was formally notified of the application submission. As Aquila has been afforded an opportunity to make submissions prior to the inquiry, the Applicant considers that there is nothing to indicate that Aquila has suffered prejudice. In support of this view, the Applicant has received correspondence from Aquila's agent dated 19 June 2005 which confirms that Aquila does not consider itself to have been disadvantaged and does not wish to make any representations or take part in the inquiry proceedings.

7. DRAFT ORDER AND DEEMED PLANNING PERMISSION

- 7.1 The Applicant proposes to make some minor corrections to the draft Order. A schedule of changes to the draft Order which notes these along with the rationale for the same is enclosed. The majority of these changes are typographical and so not substantive or considered to be contentious.
- 7.2 Dependent on the progress of negotiations with third parties, modifications to the draft Order may be proposed in due course. By way of specific example, this is currently anticipated for protective provisions which are being negotiated with the Environment Agency. The Applicant may also wish to modify Article 55 (disapplication of agreements restricting use of land) of the draft Order, the inclusion of which has been objected to by the National Trust [CD2-OBJ-250]. The National Trust's objection notes that they consider a more appropriate approach for dealing with any conflict between the covenants and the Scheme is by way of negotiated agreement, and discussions with the National Trust in relation to this are ongoing.
- 7.3 The Applicant is notifying parties most directly affected, such as utilities benefiting from protective provisions and the National Trust, that the Applicant is proposing changes to the draft Order that are relevant to them.

- 7.4 The Applicant has been engaging with the Greater Cambridge Shared Planning Services (**GCSPS**) in order to agree the form of planning conditions to be attached to the deemed planning permission in the event that the application for the Scheme is granted. Once these conditions are in agreed form with GCSPS, the Applicant will submit these to the inquiry.

8. STATEMENTS OF COMMON GROUND

- 8.1 A list of the Statements of Common Ground which the Applicant is willing to enter into, subject to the relevant third party's agreement, is attached at **Appendix 2**. The Applicant considers the list to be comprehensive but would be grateful for an indication from the Inspectors as to whether submission of Statements of Common Ground with these parties would assist.

9. SUBMISSION OF ADDITIONAL DOCUMENTS

- 9.1 Following consideration of other parties' Statements of Case and in preparation for the forthcoming public inquiry, the Applicant wishes to submit into the inquiry the following additional documents:

ES Addendum

- 9.2 On 18 March 2025 the Applicant undertook a survey, in accordance with BS5837:2012, of the oldest Bramley apple trees in Coton Orchard which would be affected by the Scheme. The Applicant has prepared additional environmental information to present the findings of this survey, along with an updated assessment of the status of these trees.
- 9.3 The ES Addendum sets out respectively, the background and context for this additional assessment information, the status assigned to these trees and an update to the consideration of alternatives through Coton Orchard as a result of these findings. It also contains further detail on the measures that will be taken to mitigate impacts on these trees in light of this further assessment. In summary, whilst the ES Addendum acknowledges a finding that these trees should be regarded as veteran trees, the overall conclusions of the ES Main Report with respect to the presentation of likely significant effects remain valid; no new or materially different significant effects are reported in the ES Addendum. A copy of the ES Addendum is enclosed.
- 9.4 The Applicant has submitted the ES Addendum voluntarily and of its own volition. No direction for additional environmental information has been made by the Secretary of State under Rule 17 of the Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006. Notwithstanding this, and without prejudice to any formal requirement to do so, the Applicant intends to advertise the ES Addendum in the local press as well as publish it on the Applicant's website. The ES Addendum will also be made available on the inquiry website and has been electronically served on parties who have submitted a Statement of Case by copy of this letter. The Applicant does not consider it necessary or proportionate to serve the ES Addendum on all parties referred to in the Book of Reference. The Applicant would be grateful if the Inspectors could confirm their agreement to this approach.

CPPF Alternatives Scheme – Engineering Assessment

- 9.5 The Statement of Case of Cambridge Past Present and Future ("**CPPF**") and Coton Parish Council contains further details in respect of a proposed in-highway bus priority scheme on Maddingley Road, which is proposed as an alternative to the Scheme. The Applicant has considered this alternative and has prepared a document, entitled 'CPPF Alternative Scheme – Engineering Assessment', to present its findings. In summary, this Engineering Assessment concludes that a central inbound bus lane is not safe or deliverable due to the number of departures from standard which would be required and, further, that a variation of this alternative as a nearside bus lane arrangement, being similar to options previously assessed in the Outline Business Case, is not preferable to the current Scheme. A copy of the Engineering Assessment will be submitted to the inquiry and is proposed to be made available on the inquiry website no later than Tuesday 22 July 2025.

TAG Technical Note

- 9.6 In May 2025, the Department for Transport issued its Value for Money Framework. There have also been other updates to the Department's transport analysis guidance (**TAG**) which are relevant to the Scheme. In addition, certain parties have commented that assessments for the Scheme have not taken account of changes in transport movements following the Covid 19 pandemic or the resulting effect on scheme benefits. Accordingly, the Applicant proposes to submit a technical note to the inquiry which addresses the nature and implications of relevant updates and changes. Given the Value for Money Framework has only recently been issued, the Applicant is not yet in a position to submit the technical note to the inquiry but would hope to do so no later than Tuesday 22 July 2025.

For ease of reference, a full list of enclosures to this letter is attached at **Appendix 3**.

This letter and its enclosures have been copied electronically to those parties who have submitted a Statement of Case (as listed in **Appendix 4**).

We hope the above information is helpful to the Inspectors and the parties intending to appear at the forthcoming Inquiry.

Our client will be represented by Leading Counsel and Counsel at the Pre-Inquiry Meeting and so will be available to answer any questions or points of clarification in respect of the above matters as necessary.

Yours faithfully

Womble Bond Dickinson (UK) LLP

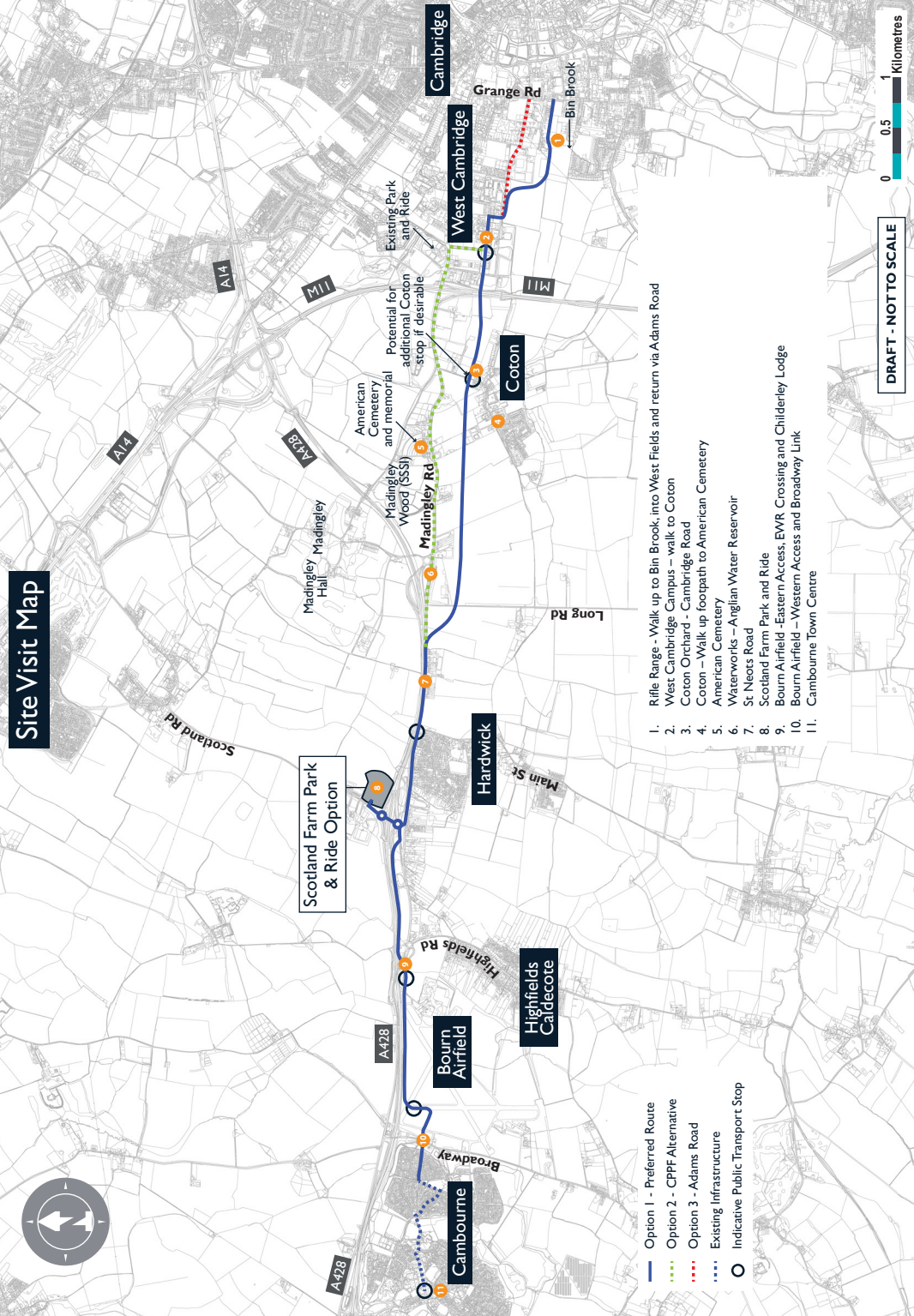
Womble Bond Dickinson (UK) LLP

Copy to

1. transportinfrastructure@dft.gov.uk
2. Rachel Dominey (DfT)
3. Brenda Taplin (DfT)

APPENDIX 1: SITE VISIT

Site Visit Map



Scotland Farm Park
& Ride Option

Cambridge

Bourn Airfield

Highfields Caldecote

Hardwick

Coton

Cambridge

West Cambridge

- Option 1 - Preferred Route
- - - Option 2 - CPPF Alternative
- . . . Option 3 - Adams Road
- - - Existing Infrastructure
- Indicative Public Transport Stop

1. Rifle Range - Walk up to Bin Brook, into West Fields and return via Adams Road
2. West Cambridge Campus - walk to Coton
3. Coton Orchard - Cambridge Road
4. Coton - Walk up footpath to American Cemetery
5. American Cemetery
6. Waterworks - Anglian Water Reservoir
7. St Neots Road
8. Scotland Farm Park and Ride
9. Bourn Airfield - Eastern Access, EWR Crossing and Childerley Lodge
10. Bourn Airfield - Western Access and Broadway Link
11. Cambourne Town Centre

DRAFT - NOT TO SCALE

0 0.5 1 Kilometres

APPENDIX 2: APPLICANT'S PROPOSED LIST OF STATEMENTS OF COMMON GROUND

1. Cambridge City Council
2. South Cambridgeshire District Council
3. Natural England
4. Environment Agency
5. Cambridge Past Present & Future (CPPF)
6. Coton Parish Council
7. Cambridge Busway Action Group
8. Clare Hall College
9. Houston Crest Properties Ltd
10. Gough Way Residents' Association
11. National Highways
12. East-West Rail
13. Anglian Water

APPENDIX 3: LIST OF ENCLOSURES AND DOCUMENTS

ENCLOSURES

1. Site Visit Map
2. Applicant's List of Statements of Common Ground
3. List of Enclosures and Documents
4. List of those served a copy of this letter.

DOCUMENTS

10. Applicant's List of Appearances
11. Applicant's Procedural Note
12. Schedule of Changes to draft Order
13. ES Addendum

APPENDIX 4: LIST OF THOSE ELECTRONICALLY SERVED A COPY OF THIS LETTER

- 1 Allan Thomas Treacy
- 2 J Green (Queens College – University of Cambridge)
- 3 Coton Orchard Limited, Houston Crest Properties Limited and Anna Gazeley
- 4 Gough Way Residents Association (K Fry)
- 5 North Newnham Residents Association
- 6 East West Rail
- 7 Friends of the Cam (S Buckingham)
- 8 Cadent Gas Limited
- 9 A Davidson
- 10 C Postgate
- 11 Cambridge Busways Action Group
- 12 S Lucy
- 13 PX Farms (Land) Limited
- 14 SCDC & Cambridge City Council
- 15 J and W R Sadler
- 16 Clare Hall, University of Cambridge
- 17 CPPF & Coton Parish Council (Richard Buxton Sols)
- 18 CPRE Cambridgeshire & Peterborough
- 19 The Woodland Trust
- 20 P Singleton
- 21 Federation of Cambridge Residents' Association
- 22 M Sullivan