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7 March 2025

Your ref:
Our ref: CHA006/0001/RG

Dear Madam

**Transport and Works Act 1992
Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006
Proposed Cambridge South East Transport Order 202X ("the Proposed Order")
Land off Hinton Way, Stapleford/Great Shelford**

We are instructed by David Chalk, William Chalk and Mark Trafford KC ("**the Chalk Family**") in relation to the Proposed Order.

According to the book of reference, the Chalk Family hold the freehold interest in plots 54, 55, 56, 58, 60, 61, 62, 63 and 66 shown on the works and land plans and included within the book of reference accompanying the application for the Proposed Order made by Cambridgeshire County Council ("**the Applicant**"). These plots form part of the Chalk Family's larger landholding comprising approximately 24 acres of land ("**the Chalk Land**") to the south of Hinton Way.

The Chalk Land is subject to exercise of compulsory purchase and/or temporary possession powers under Parts 5 and 6 of the Proposed Order, for the purposes of Works Nos. 4 and 5 set out in Schedule 1 to the Order and shown on sheets 4 and 5 of the Works and Land Plans. Work no 5 includes provision for a new bus stop south of Hinton way with associated infrastructure and access from Hinton Way. This is to be constructed on parts of plots 54 and 56 as shown on sheet 4 of the rights of way and traffic regulations plans. Plot 58 is subject to temporary possession powers. We understand it is to be used as a construction compound and for the storage of materials pursuant to Schedule 8 to the Proposed Order.

Of particular concern to the Chalk Family is the prospect of compulsory purchase of plots 54 and 56 which would prevent access from the remaining Chalk Land to and from the highway network.

The Chalk Family have been in discussions with the Applicant and its representatives for several years regarding its proposals. The Chalk Family has advised the Applicant's representatives on a number of occasions that, in principle, it is supportive of the overall project. However, the Chalk Family has also repeatedly emphasised to the Applicant's representatives that its support is entirely dependent on the need to retain its historic access rights to the Chalk Land. To achieve this, and shortly after the

application for the Proposed Order, the Chalk Family and the Applicant reached agreement in principle that the planned access road from Hinton Way up to the boundary of the retained Chalk Land is to be adopted by the Applicant as a public highway with a carriageway of 7.3 metres in width.

The parties are discussing heads of terms for an agreement. This will also include provisions for the voluntary transfer of those parts of the Chalk Land which are required for the construction of the bus stop off Hinton Way and the building of the access road which is to be adopted. This land falls within plots designated for compulsory purchase. The agreement will also cover the licencing of Chalk Land subject to powers of temporary possession. Any agreement will necessitate the amending of Schedule 4 to the Proposed Order at pages 47-48 so that reference to the provision of "...a new private means of access between points HA04.09 and HA04.10 on sheet 4 of the rights of way and traffic regulations plans" is amended to refer to the provision of a new adopted public highway. Sheet 4 of the rights of way and traffic regulations plans will also have to be amended.

It is hoped that the agreement can be finalised and legally documented before the commencement of the public inquiry or hearing into the Proposed Order. If agreement cannot be reached before then, the Chalk Family objects to the granting of compulsory purchase and temporary possession powers over any part of the Chalk Land and reserves the right to set out its position in greater detail prior to any such inquiry or hearing and to appear at the same.

We should be grateful if you would keep us informed of the appointment of the Inspector and of any pre-inquiry meeting to set a timetable for the inquiry or hearing.

Yours faithfully,

A handwritten signature in black ink that reads "Town Legal LLP". The signature is written in a cursive, slightly stylized font.

Town Legal LLP