CLOSING STATEMENT – ROB SADLER
FOR J & W R SADLER

Thank you, Inspectors.

My family has never opposed the principle of improving public transport between Cambourne and Cambridge. We fully support better access to education and employment. What we cannot support is a scheme that causes unnecessary environmental harm, fails to deliver its stated purpose, and has been advanced without proper and meaningful engagement with those directly affected.

At the preliminary meeting for this Inquiry, I raised my concern that proper procedures had not been followed in the lead-up to these proceedings. Through the course of this Inquiry and from the Applicant's own witnesses, those concerns have been fully justified.

1. The Comberton to Cambridge Greenways

I would like to begin with the Comberton to Cambridge Greenways as I did with my oral statement on the 22nd October.

On 15 December 2024, the GCP's Senior Project Manager, Mr Camp, confirmed in writing that the Greenway could remain on the existing bridleway, meaning no land from our farm was required. This has never been disputed by the Applicant. Despite this, during the Inquiry the Applicant sought to portray me as uncooperative, relying on a single August 24 email stripped of context. At that time, we had just discovered that our family burial site lay seven metres within the proposed compulsory acquisition boundary - something we had repeatedly been told was "not within the busway." I was trying to understand how such a mistake could have been made, and whether the Applicant's assurances could be relied upon.

My temporary refusal of access for intrusive digging was not opposition to the Greenways. It was a simple request for clarity before allowing works on private land. There was no meeting or explanation offered by the Applicant in advance of requiring access for the dig. Once proper communication occurred with Mr Camp, the outcome was constructive:

1. the route remained on the existing bridleway,
2. no unnecessary Green Belt land was taken, and
3. public cost was avoided, including the intrusive dig.

This demonstrates something the Applicant should have learned long ago: when landowners are treated fairly and engaged properly, better, cheaper, and less harmful solutions emerge.

Although the Greenways scheme is not before this Inquiry, the pattern is identical to C to C. Where the route is easy, the Applicant keeps to the existing corridor. Where it becomes difficult, it diverts off onto private land even where the established route remains viable. Exactly the same pattern has occurred with the busway, when the A1303 becomes constrained, instead of working within the highway and landowners, the Applicant diverts off into the Green Belt. The optics are identical and difficult to understand why this matter was later used in cross examination.

2. Engagement and the Reliability of the Applicant's Record

The Applicant's own correspondence confirms:

1. Before April 2024, there were only two informal visits to the farm. No minutes, no agendas, no structured discussion, and no attempt to understand operational or personal needs can be provided by the applicant.

2. The route alignment was fixed in March 2023, and the Applicant has admitted that no meaningful realignment could be considered after that point. Consultation therefore took place only after key decisions had already been made. This raises a fundamental question: was CBRE aware of this design freeze at the first formal meeting in April 2024? If they were, failing to disclose was misleading. If they were not, the engagement process was flawed. What is clear is that by 10 October 24, CBRE were fully aware, as they were copied into correspondence expressly confirming the design freeze.

3. No early formal notification letter was ever issued to explain the scheme, the statutory process, or the landowners' rights. This statement was not challenged by the Applicant during cross examination.

4. The Applicant claimed in writing that public exhibitions between 2015 and 2021 were an adequate substituted for direct engagement with landowners. They do not. Public exhibitions or general consultations cannot replace proper formal dialogue with those whose land is subject to compulsory acquisition. And this too has not been challenged by the Applicant at this Inquiry.

The reliability of the Applicant's official records is also in doubt. The Applicants "record of engagement" dated July 2025 included an entry claiming that I emailed on 7 September 2023 to say I would act for my family. We now know this was a false entry No such email exists. The Applicant has accepted this was a completely false entry.

This brings me to one of the most serious issue in this Inquiry: fabricated evidence.

During questions on 12 November, Mr Cameron put directly to the Applicant's witness, Mr Franklin of CBRE, the following log entry:

"Heads of Terms and valuation shared with Bidwells, including draft agreements for both freehold and tenanted land – 22 February 2022."

Mr Cameron asked: "Were Heads of Terms sent on that date?"

Mr Franklin replied: "No."

He was then asked whether they were sent in May 2022.

Again, "No." from Mr Franklin

When pressed on when Heads of Terms were in fact issued, Mr Franklin first suggested August 2024 but his answer was not clear. He then immediately changed his answer to 31 October 2024.

This is not a typo. It is not an administrative slip. It is a completely fabricated log entry on the single most important indicator of meaningful negotiation. As I wrote in my Proof of Evidence, the Applicant's "record of engagement" is not a record at all - it is an attempt to rewriting history.

The CBRE log also includes an entry from 1 August 2023 in which Henry Church of CBRE writes to someone called "Samuel" apologising for not finding him a job in New Zealand. What possible relevance could that have to the C2C scheme? It reflects a culture of carelessness with public money.

3. My Cross-Examination

When I was cross-examined, Mr Cameron pressed me repeatedly about this fabricated entry by CBRE, asking several times whether I was saying it was incorrect. At the time, I reserved judgment because I had never seen these Heads of Terms. And crucially, this supposed 2022 entry does not appear anywhere in the Applicant's own July 2025 Record of Engagement. I could not understand how this entry could be right.

During his questions to me, Mr Cameron and I had a brief courteous exchange about the importance of referencing the precise parts of case law in a Proof of Evidence document and I readily accepted the advice. In the same constructive spirit, one would expect that the evidential material behind such a significant log entry would have been checked before it was put so firmly to me during cross examination.

The fabricated entry attempted two things:

1. To create the appearance of early negotiation.
2. To imply that Bidwells acted as our representatives.

Both are categorically false.

Bidwells were engaged only for isolated survey work and the CBRE log confirms this. I would like to acknowledge that when Mr Franklin gave his oral evidence, Mr Cameron dealt with this issue directly and professionally, ensuring the full facts were presented. For that I am genuinely grateful.

4. Mr Franklin's Oral Evidence and Its Reliability

During oral evidence, Mr Franklin attempted to present a picture of constructive dialogue. With respect, that account does not align with the documented events or with reality. Having already acknowledged that his own engagement log contains a fabricated entry on a matter as fundamental as Heads of Terms, one might reasonably have expected the remainder of his evidence to proceed with caution. Instead, significant parts of his oral account continued to diverge from the factual record in ways that simply cannot be reconciled with what actually occurred. It is difficult to place any weight on his wider evidence. I could take the Inquiry through each inconsistency point by point, but I am limited to 20 minutes.

5. CBRE's Lack of Continuity

I would also note that I have never met Mr Franklin, have never spoken to him, and have never corresponded with him.

From April 2024 through to the making of the Orders, I dealt with Mr Henry Church, Mr William Gullett, and someone called Mr Brandon O'Connor. There was no continuity, and no coherent engagement strategy. This too undermines any suggestion of "ongoing dialogue".

And the disparity becomes even more stark when one compares our engagement log with those of institutional landowners including colleges and the University. I do not need to set out the detail. A simple like-for-like comparison of the Applicant's logs speaks for itself, and I invite the Inspectors to consider that comparison if they deem it appropriate.

The Human Reality

My elderly parents have lived under this pressure for more than ten years. They were never given proper meetings, never given clear information, and never given meaningful negotiation. In one encounter with the Applicant's survey team, my father was told he should invest in "flying tractors".

Our family farm is surrounded by land owned by the University of Cambridge, the same University that sits on the GCP Board and yet it is we who are most directly and severely affected. Whether intentional or not, the effect has been the same: J&W R Sadler were left out, ignored, and denied the early and meaningful engagement the law requires.

6. The Burial Site - A Distressing Example of How This Scheme Has Been Handled

The burial site is one of the most distressing examples of how this scheme has been approached. My grandparents, Frank and Eileen Sadler, chose that spot in 1992 because, in my grandfather's words, it had "the best view on the farm." The idea that this resting place might fall inside the boundary of a major infrastructure project would have been unthinkable to him.

From April 2024 onwards, I raised this issue repeatedly. Each time, I was told by Mr Baker: "It is not within the busway."

Yet on 26 July 2024, when the Applicant finally marked out the full 45-metre working width, it became clear that the ashes lay seven metres inside the compulsory acquisition boundary. Why this marking could not have been done months or even years earlier remains unexplained.

When challenged, Mr Baker said and subsequently wrote that when he said "not within the busway", he meant only the 7.4-metre tarmac strip. To my parents, that explanation felt deeply disingenuous. It reduces a matter of personal significance to a technicality and ignores the reality of a 45-metre construction corridor being compulsorily acquired.

The Applicant later suggested the ashes could be left "just outside" the operational boundary. But the only reason the burial site is in jeopardy at all is because the Applicant chose to drive a 45-metre-wide transport corridor through the centre of a working farm where it does not need to be and did so without meaningful engagement.

Moving the boundary line by one metre away from the burial site does not resolve the issue. This is simply not how a public authority should treat those whose land and family history lie directly in the path of its decisions.

Under s.149 Equality Act 2010, the Applicant had a duty to engage with a disabled landowner. No such consultation ever took place, and the Applicant has not challenged this point at any stage of the Inquiry.

Conclusion of This Section

Taken together - the fabricated records, the lack of any records of meetings before April 2024, the mishandled burial site, and the complete absence of disability engagement, it is clear that there has been no meaningful negotiation or engagement before the Applicant sought compulsory purchase powers.

7. Direct Impacts and Foreseeable Safety Risks

The proposed busway would sever our farm across a route used daily by children, staff, machinery, and my disabled mother. Up to 20-30 movements occur at this point on a typical day. This operational reality has never been acknowledged by the Applicant or challenged at any point during this Inquiry.

The section between Cambridge Road and Comberton Long Road is over 2 km long, dead straight, unfenced, unlit, and without intersections. Similar design conditions on the existing guided busway have resulted in repeated vehicle intrusions including joyriders accessing the track, stolen vehicles being driven along it, and fatal accidents. These incidents were serious enough that the County Council itself was prosecuted by the Health & Safety Executive.

This is not a speculative concern. It is a foreseeable risk. Creating another isolated, unprotected, high-speed corridor will inevitably create problems. And if or more realistically, when an incident occurs on this section, I will almost certainly be the first responder to any accident, because the line runs directly through the farm.

The County Council, as promoter and designer of the scheme, cannot later claim it was unaware of these risks. They are now set out clearly, publicly, and on the record of this Inquiry

8. Scotland Farm Park & Ride - Behavioural Reality

We have heard from a senior planning officer for the Applicant that he frequently drives to Madingley Road Park & Ride and cycles the last six minutes into Cambridge. I make the same journey myself on a daily basis. Are we seriously to assume that he or anyone else, will instead drive to Scotland Farm, then cycle 30 minutes into the city, and 40 minutes uphill on the return? The Applicant has not explained who will use Scotland Farm Park & Ride.

9.The Existing Northern Corridor Already Works

The public has already funded a fast, reliable, direct transport spine:

1. the £1.5bn A428/A14 upgrade; and
2. the guided busway from Orchard Park serving:
   – Cambridge Regional College (10,000 students)
   – Cambridge Science Park
   – Cambridge North (with links to Central and soon Cambridge South).

This corridor is operational today, faster and providing more certain journey times than the proposed C2C. It also delivers on the promise of access to education and employment whereas CtoC does not. Yet it has been largely absent from the Applicant's case.

10. West Cambridge Site

The Applicant has produced no travel to work evidence showing commuting flows from Cambourne to West Cambridge. It has been mentioned during the inquiry by the Applicants own witnesses that the University has recently spent over £500 million on the West Cambridge site and this includes the Cavendish and Whittle Laboratories. But this goes to the heart of my argument: that investment has delivered academic and research facilities and not commercial office space for third part tenants. The West Cambridge site is not and will never be a conventional business park.

Furthermore, the University's masterplan now provides for around 5,650 homes at Eddington, half of which are key-worker housing for University staff, directly reducing commuting needs. Eddington also includes large postgraduate accommodation blocks, further reducing external demand. This is central to the University's own strategy for the city.

In short: West Cambridge is being planned in a way that reduces external commuting, directly undermining the Applicant's claim of unmet demand from Cambourne.

11. CPPF Alignment and St John's College

I have previously offered a narrow strip of land along the A1303 to facilitate the CPPF on-road alignment particularly opposite Madingley Wood.

St John's College also owns land opposite the wood and Mr Cameron was correct to point out that I cannot speak for them, but the real-world choice is obvious for the College:

1. a 45-metre corridor completely severing land under the Applicant's scheme; or
2. a minimal boundary strip that may or may not be required under the CPPF section. Verge land that the College is probably unaware it owns.

Any responsible landowner would choose the latter.

12.The American Cemetery

A carefully designed pedestrian and cycle route past the Cemetery entrance would strengthen its role as a place of reflection and learning. It is worth noting the Cemetery already receives buses on site safely and without difficulty pulling into the grounds every 10-15 minutes, including Cambridge open top tourist buses.

As confirmed to Mr Cameron I am not a heritage expert and nor is Squadron leader Colin Bell (104) or Randolph Churchill in the true planning sense but both recognise the quiet value such a route could bring. Their views reflect the Cemetery's enduring purpose of remembrance education, and connections between generations.

13. Returning to the Core Question

I expect the Applicant in closing will urge you to disregard the CPPF sectional proposal on grounds of insufficient detail, yet to me, I have seen far more detail with the CPPF proposal than with the Applicants proposal. They will I'm sure go on to say that "we cannot wait" for the CPPF scheme to be built yet I have not heard any credible evidence from a chartered civil engineer or a principle (Tier 1) contractor to support this claim. What we have heard is opinion intended to create pressure to accept a flawed scheme and by that I mean the Applicants scheme.

The Applicants position stripped of its presentation amounts to this: even though our scheme is flawed, environmentally harmful, and clearly not supported by proper consultation, you must approve it because we have no plan B.

But an on-road solution for the short 1.6 km section, combined with use of the northern corridor is entirely feasible.

I also want to place on the record: because our family owns land along the A1303 corridor, we would willingly make temporary construction compound space available. This would materially reduce the construction period and minimise disruption. The obstacles the Applicant claims

are insurmountable are, in reality, perfectly manageable through cooperation and competent planning.

There is a saying: **"You do not have to accept a bad option simply because someone tells you it is the only option".** That is precisely where we are today.

14. The Conduct of Consultation

Before turning to my closing, I want to address a final point in anticipation of the Applicant's submissions. They may argue that the errors in their engagement record are minor, that the fabricated entries are less than important, or that shortcomings in consultation can be excused by the scale or history of the project. With respect, none of that is compatible with the statutory framework. The duty to make reasonable efforts to acquire land by agreement, the duty to maintain accurate records of engagement, and the duty to consult a disabled landowner are not optional, and they are not retrospective. The most serious fabricated entry asserting that Heads of Terms were issued when they were not sits at the centre of the Applicant's claim of early negotiation. A process that records negotiations that never occurred cannot satisfy the requirement for reasonable efforts before seeking compulsory purchase powers. And given how firmly that entry was put to me in cross-examination, I think it is only fair to observe that all parties are entitled to expect that key evidential material has been properly checked before it is relied upon.

These are not procedural oversights. These are structural failings. The rules require that reasonable efforts be made to acquire land by agreement before seeking compulsory purchase powers. The evidence before this Inquiry including the Applicant's own documents, sworn admissions of its witnesses, and the absence of any meaningful negotiation shows that this statutory requirement has not been met.

Closing

Inspectors, the evidence before you shows that the scheme proposed by the Applicant is not the right one.

Thank you.