

Closing Statement: Cambourne to Cambridge Order Public Inquiry

OBJ-52 | Coton Orchard, Anna Gazeley



CPPF say add a bus-lane beside A1303 (above) CtoC, not cut a new off-road GCP busway through Coton Orchard

Introduction

I want to begin by thanking those who have borne this Sisyphean struggle alongside us — neighbours, volunteers, experts, our fellow residents of Cambridgeshire. Ordinary people who have been extraordinary. For 10 years they have given up weekends with family, counted bats and moths at dawn and dusk, gathered data to lend weight to our words while introducing the next generation to the wonders of the natural world.

They have taken time from work, juggled care and other commitments, and found the resolve to be here today. They have sat in this room, day after day, submitting themselves — with grace and courage — to the cross-examination of the County's counsel. They are not paid professionals, not defendants, but members of the public who care enough to take part in this public inquiry.

They have baked cakes and brewed tea, run stalls and sold crafts in the village hall to contribute to **Cambridge Past, Present & Future** and **Coton Parish Council's £140,000¹** 'fighting fund' — to help pay for the barrister who speaks after me, representing those defending this landscape — while the County spent over **£2 million² of public funds on lawyers** before the Inquiry had even begun. The imbalance is stark, but it only makes their efforts all the more admirable.

¹ <https://app.sheepcrm.com/cambridgeppf/appeals/65c256f576eb2b57e40ce317/>

² [Cambridgeshire County Council Expenditure over £500 - data.gov.uk](https://data.gov.uk/dataset/cambridgeshire-county-council-expenditure-over-500)

They have come here and answered for what they did not cause, while those whose votes set this in motion — the County Councillors — have yet to appear to defend their choice, to answer your questions, Inspectors, or ours — the public they claim to serve.

We have been told that this scheme is “widely supported,” and that opposition comes only from “a few local affected people.” If that means those who have walked the route, who know the land, and have stood on the soil itself — not sat in an office far away, drawing lines with no sense of what they cut through — then I am proud to be counted among them.

However, the over **300** formal objectors, **14** environmental groups, and the **24,224**³ who have signed the CPPF petition, written to MPs, watched these proceedings from across the world — they are not “a few”. They are proof that conscience remains alive, articulate, and uncowed — in Cambridgeshire and far beyond our borders.

On Words and What They Hide

This Inquiry has, in many ways, been about language — about the distance between what is said and what is meant.

I should admit that I am an accountant by training. I’m not a lawyer or expert witness; this is my first experience of a public inquiry. I came here expecting to talk about how this scheme doesn’t add up — to share my lived experience, over 30 years walking Coton’s footpaths — not to duel in adjectives, or quibble over citations and my choice of editing tools. But even those of us better with numbers than words can tell when language is being made to carry more weight than truth will bear.

We have been encouraged by the Applicant to treat words like “**need**”, “**growth**”, “**benefit**” and “**sustainable**”⁴ as unquestioned virtues. But your task is to test whether those words match what is real — what you have seen and heard yourselves. And whether they survive the application of ordinary **common sense**.

The County’s Opening claimed that “the planning balance is tilted firmly in favour of the scheme.” (§21 p 4) It sounds authoritative — though perhaps that is easier to assert when the same hands have written both the policy and the proposal it endorses.

When authorship and advocacy overlap, balance becomes less a matter of evidence and more a matter of design.

³ <https://www.change.org/p/save-the-green-corridor-cambourne-to-cambridge-bus-lane-not-busway>

⁴ ‘Sustainable’ Cambridge busway will cause irreversible ecological harm, inquiry told | Environment | The Guardian

A Question of Need

When this Inquiry began, the Applicant spoke of “near-universal agreement” that a guided busway was needed between **Cambourne and Cambridge** ([§1-3 p 1](#)). No such consensus exists. There *is* agreement that public transport *could* — and *should* — be improved. But goodwill is not evidence, and it does not justify *this* route or *this* scheme.

Cambourne already has regular bus services linking it to Cambridge, St Neots and beyond — as **Miranda Fyfe**⁵ demonstrated when she took buses across Cambridge to this Inquiry. And **Dr Sutton**⁶, who **cycled into Cambourne from Cambridge**, showed that active-travel routes already exist and can be bolstered by schemes such as the Comberton Greenway⁷, already under construction.

Could public transport be better? Of course. But the suggestion that Cambourne is “cut off” does not survive contact with the **bus timetable**⁸, the **road**, or the **lived experience** of those who use them.

After spending more than **£18 million**⁹, the County Council has not evidenced where people actually want or need to go — or how *this scheme* would serve those journeys better than improvements to *existing* roads and services. Public transport should begin with people, not policy.

The **Mayor**¹⁰ — as Leader of the Combined Authority and therefore the **Transport Authority** — has made clear he cannot guarantee that any bus service will ever run on the proposed route. His duty is to meet the needs of the whole region, not one narrow corridor, from his finite budget. Those limited resources should deliver the greatest public good, not be sunk into a single rigid corridor already covered by the **Stagecoach 4 Bus Route**¹¹, **Whippet Coaches X3**¹² and other existing services — while some communities across Cambridgeshire have none at all.

Availability of Funding [Referenced [Coton Orchard CtoC PoE p34](#)]

Fiscal prudence is a lesson the **County — as the Accountable**¹³ **Body for the GCP** — might wish to revisit. Its projected **budget deficit for 2025–26** has grown during the course of this Inquiry alone, from **£28 million** to **£34.2 million**¹⁴, and now to **£40.3 million**¹⁵.

⁵ [cd29-28 miranda fyfe.pdf](#)

⁶ [cd29-83 speaking note of dr bridget sutton obj-94.pdf](#)

⁷ [Comberton Greenway Public Engagement Brochure 2022](#)

⁸ [Bus Tracker](#)

⁹ GCP projects - Google Sheets

¹⁰ [obj-313 final statement of paul bristow.pdf](#)

¹¹ [4 Bus Route & Timetable: Cambridge - Cambourne | Stagecoach](#)

¹² [X3 - Huntingdon - Addenbrooke's - Whippet Coaches - Bus Times](#)

¹³ [Agenda Document Pack - Greater Cambridge Partnership Executive Board - 06 11 2025 p50](#)

¹⁴ [Coton Orchard CtoC PoE p34](#)

¹⁵ [Cambridgeshire County Council facing £40million budget gap](#)

The project's own **Economic Case** places the **Benefit–Cost Ratio** between **0.43¹⁶** and **0.5**. In plain terms: **for every pound of public money invested, barely half is returned**. While the **City Deal grant** may fund the initial infrastructure, any overspend — which experience suggests is all but guaranteed — will fall to the County, along with the long-term cost of **maintaining it: £1.1 million per annum** (at 2018 prices) for infrastructure alone.

Table 25: Operational and maintenance costs (£000's)

Item	Price Basis	Cost (£,000)
Infrastructure maintenance	2018 prices	66,042
Bus purchase costs	2019 prices	17,361
Bus operating costs	2019 prices	205,292

Source: Mott MacDonald

[cd1-20_1 - economic-case.pdf](#) £66m/ 60 years = £1.1m

	Borrowing 14.3 Based upon the current programme of expenditure, the GCP budget will have a cashflow deficit from 2027/28. During budget setting for 2024, the GCP reported progress with reducing overall overprogramming: total expenditure was broadly equivalent to total income (excluding the impact of borrowing to fund expenditure ahead of income receivable). That position remains in the current budget round with a programme surplus of c£1mi. In current plans, expenditure is focused in the period 2026-29 and is not matched with section 106 funding income until developments advance. This extends well beyond the lifetime of the current GCP programme and leads to a growing cashflow deficit from 2027/28 Under the local government prudential framework, borrowing can only be utilised for capital purposes and in accordance with prudential limits. Additionally, S106 funds are usually ringfenced for capital purposes which means that they cannot be applied to the costs of borrowing. This means at present significant additional bridging funding is needed to enable delivery of proposed schemes to the current timetable. Appendix 9 is prepared on a cashflows basis (excluding borrowing costs) and notes the impacts of the cashflow deficit on the revenue budget. To address this either additional funding will need to be identified (GCP has successfully secured financing support from Homes England for the Waterbeach station relocation, for example), or programme delivery timescales will need to be reprofiled. At present, the County Council, as GCP's Accountable Body, has not included an estimate of repayable borrowing from GCP within its capital strategy whilst the partnership gives further consideration to likely delivery timescales and available funding sources.	
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GCP Quarterly Progress Report 6 November 2025 [GCP Budget Strategy and Allocations for 2026/27 PDF p50](#)

The GCP's own budget now forecasts a **cashflow¹⁷ deficit reaching £185¹⁸ million** by **2030/31 — beyond the lifetime of the City Deal**, and potentially beyond the lifetime of the Applicant in its current form¹⁹. The heaviest spending falls years before the income on which they rely. Bridging that gap would require **borrowing** that does not appear in the **County's capital strategy**, and Section 106 receipts cannot lawfully be used to service that debt. **No alternative funding has been identified**.

¹⁶ [cd1-20_1 - economic-case.pdf](#) p57

¹⁷ [Agenda Document Pack - GCP Executive Board - 06_11_2025](#) Borrowing §14.3 p50

¹⁸ [Agenda Document Pack - GCP Executive Board - 06_11_2025](#) p63 *excluding financing costs on borrowing

¹⁹ [Devolution and Local Government Reorganisation | Cambridgeshire County Council](#)

And if the GCP's contingency is to go back to the Treasury, recent experience should give pause. Cambridge's Waste Water Treatment Plant Relocation Project²⁰ (more familiar locally as Save Honey Hill) lost its Housing Infrastructure Fund support *after* securing its Development Consent Order, a reminder that central funding is never guaranteed — especially when competing with new rail infrastructure such as Cambridge East and the confirmed **Cambourne station on East West Rail**²¹, both of which Government has repeatedly endorsed.

Under the Transport and Works Act framework — **and the parallel principles governing compulsory acquisition** — the Secretary of State must be satisfied that a scheme is **properly funded, financially prudent and capable of delivery**. On the figures before us, that assurance is not yet available.

“Whether there are likely to be any impediments to CCC implementing the scheme, including the availability of funding.” [CD25-01 Statement of Matters dated 11 August 25](#) § 6c.

Viewed against the statutory framework in which this decision must be made, it is perhaps a curious moment to champion a project whose costs multiply as swiftly as its justification shrinks.

Misguided Busway [[Referenced Coton Orchard CtoC PoE p31](#)]

These figures alone should stop this scheme in its tracks — though it is not clear that it has any. Whether kerb-guided or optical, the Order does not specify.

There is no mention in the **Transport and Works Act Order** or the **Planning Statement** of the guidance mechanism — only vague assurances in the **Transport Assessment** (TA) and the **Outline Business Case Addendum** (OBCA):

*“It is *intended* that buses using the Busway will be optically guided.”*
([TA §1.2.1 p1](#))

*“It has been *assumed* that CtoC will be delivered as an optical guidance system.”*
([OBCA §4.2.3 p 12](#))

For something called guided, it is remarkably without direction.

The County is responsible for Highways; the GCP is a delivery partnership. Neither has the power to run or franchise bus services. How can a transport scheme proceed when those promoting it have no authority to make buses run upon it?

²⁰ [Government decision not to fund Cambridge Waste Water Treatment Plant relocation - Cambridge City Council](#)

²¹ <https://eastwestrail.co.uk/you-said-we-did/you-said-we-did-report>

“bus services are (only) *assumed* (by the Applicant) to be associated with the CtoC Scheme” ([TA §2.2.15 p5](#))

If the Applicant truly wishes to improve public transport, perhaps the most constructive step would be to repair the roads so that the Mayor can put buses on them — and to maintain the paths so that children can walk and cycle safely without needing to veer into danger.

This is why joined-up thinking — and joined-up transport — are essential. The test is not whether we can pour concrete west of Cambridge, but whether we can connect people across it, in ways that serve actual need rather than imagined.

And while the Applicant has **drafted conditions**²² that **bars buses from operating between midnight and 6 a.m.** for this “strategic transport route” it has given no clear account of how buses will proceed beyond Grange Road. **Andy Campbell**²³ — former Managing Director of Stagecoach East — has publicly criticised the GCP route as “fundamentally flawed.”

This route fails to provide direct access to Addenbrooke’s Hospital, post-16 education in Cambridge, Science Parks to the north, or other key destinations such as the Cambridge Biomedical Campus and across the southern arc where the greatest concentration of jobs and growth lies.

Matthew Baker²⁴ Cambridge resident and worker on the **West Cambridge** site, echoed this in his evidence to this Inquiry. **Setting out — turn by turn, street by street — the dangers and delays faced by buses trying to enter this already congested pinch-point.**

Growth & NSIP Conflict [Referenced [Coton Orchard CtoC PoE p32](#)]

Much of what we have heard from the Applicant has been framed in the language of growth — jobs, housing, the economy. Central government has called Cambridge “*the engine to drive economic growth across Britain.*” The question is not whether that ambition exists, but whether *this* scheme, on *this* alignment, genuinely supports it.

Yet this route risks obstructing the very national infrastructure on which that growth depends. Under Madingley Hill lies land identified for the **Madingley Service Reservoir**, part of the strategic water supply works linked to the **Fens Reservoir Project**²⁵, a **Nationally Significant Infrastructure Project**. The scheme allows for up to **30 million litres** of treated water to be stored within a **safeguarded zone** of around **13 hectares**.

²² [Draft Condition Schedule 13-11-25\(219009975.1\).docx](#) 34 (i) PDF p24

²³ BBC Radio Cambs Chris Mann Show 22 April 2024 available BBC Sounds

²⁴ [cd29-81 speaking notes of matthew baker.pdf](#)

²⁵ <https://projectmap.fensreservoir.co.uk/>

Recent consultation material indicates that additional land may be required for overflow infrastructure, including a pipeline to **Bin Brook** as a safety provision. While the precise route remains to be engineered, **overflow from a service reservoir must follow the natural fall of land** — placing this corridor in direct tension with the busway alignment. At the same time, the proposed CtoC busway crosses the planned route of **East West Rail** on land that the Secretary of State has **safeguarded for the new railway**²⁶. — whether by bored tunnel or by cut-and-cover construction. The *viability* of that engineering decision has not yet been tested, and its outcome will dictate disruption across the GCP preferred scheme.

I acknowledge that the overlay in my Proof was basic — no more so, however, than the Applicant's own route plans — yet even a simple comparison with the **Planning Inspectorate's published documents** reveals clear spatial conflict. The Applicant may say these matters can be resolved; but resolution here means redesign, delay, and cost. It does not mean compatibility.



Overlay AW FR phase 3 consultation diagram²⁷ with WSP TD

It is worth recalling that the Transport and Works Act Order for the CtoC busway is a **local initiative**: promoted, led and formally submitted by the County Council as Highways Authority. They seek this Order because it is the only **legal mechanism that grants, in a single instrument, the exceptional powers** required — the **compulsory acquisition of land and rights**; the construction of permanent works such as new junctions, bridges and underpasses and the **permanent extinguishment** of private

²⁶ https://gat04-live-1517c8a4486c41609369c68f30c8-aa81074.divio-media.org/filer_public/93/dd/93dd27e1-112e-4f76-942e-76d5c79b5d43/obj-247_east_west_rail.pdf

²⁷ [AW+FENS+Phase+three+AWI+brochure.pdf](#) p30

accesses and minor roads. What it is *not* is a nationally significant scheme. Instead, it is less than **8.5 miles** of road that that would have to bend around **national water infrastructure**, thread through **future rail works**, and carve through **four Wildlife Sites** — only to stop at a congested pinch-point with little onward reach.

S106 Bourne [Referenced [Coton Orchard CtoC PoE p32](#)]

We are also told that “*growth at Bourn Airfield is particularly dependent on*” CtoC. That delivery beyond **500 dwellings** “*is prohibited by a planning condition in advance of the Busway’s delivery.*” ([§47 p 9](#)). The next words — “or equivalent provision” — change everything. They mean that growth is *not* contingent on *this* guided busway. A public, timetabled service on existing roads; a bus lane; any proportionate transport improvement would satisfy the condition.

Additionally, the County — and in particular the **District Council, as planning authority — already hold the power to vary, discharge or satisfy the requirement themselves.** They hold the key to their own lock; yet instead of turning it, they have helped fashion a **£200 million sledgehammer**. “Constraint,” “necessity,” “unlocking growth” — repeated until the rhetoric begins to sound like fact. But when examined rather than echoed, the supposed barriers to growth fall away.

Alternatives Ignored

The County insists that alternatives were “*adequately assessed*” ([§68–77 pp 16–18](#)). Yet the on-road option along the **A1303** was never tested on equal terms. Those who travel that route know it already carries buses and cyclists — and that, with modest and timely improvements, it could carry many more. A single bus lane, better signals, reliable services — **achievable now**, without destroying an ancient landscape. **But once “off-road” became GCP doctrine, every later decision was shaped to defend it, not to question it.**

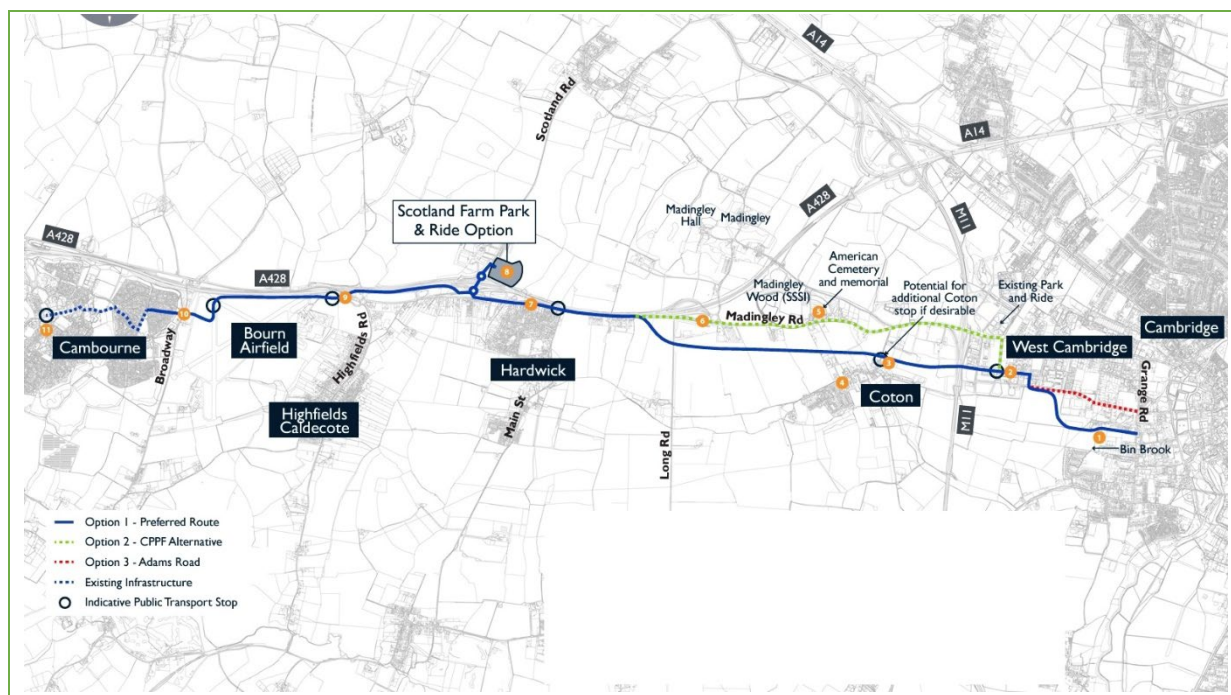
The Limits of the Order

We must remember that this Inquiry is not a debate about generalised transport ambitions or uncoded possibilities that may one day exist. It concerns the Transport and Works Act Order before you — a defined legal instrument that authorises specific works, starting at Cambourne and **terminating²⁸ on Grange Road.**

The most controversial section of this scheme is, in fact, a mere 1.6 miles — the stretch that **leaves the highway at Madingley Mulch and cuts through Madingley Hill Farms and Coton Orchard** to require **construction of a new M11 bridge**. More than half of the total

²⁸ https://gat04-live-1517c8a4486c41609369c68f30c8-aa81074.divio-media.org/filer_public/cb/06/cb06290a-7128-4e7e-a6a8-43de90b51931/cd1-02a_draft_order_clean_19_june_2025.pdf p45 Work No.10

route lies on or within existing highway land. Yet it is this short off-road fragment — the most destructive, least justified part of the scheme — that defines the whole.



CtoC Site Visit Map

That is the scheme before the Secretary of State — not the CPPF's on-road alternative²⁹, which was never claimed as a fully engineered design, but offered as an illustration of what *could* be achieved if the County, as Highways Authority, were willing to consider it.

It would be curious logic indeed if the existence of a more sensible idea became the excuse to impose one that makes no sense at all.

Safety and the Unwritten Design [Referenced [Coton Orchard CtoC PoE p15 & 31](#)]

Cambridgeshire County Council — the Applicant — is the same authority that built the St Ives Busway: a project that ran £65 million³⁰ over budget, a near 60% overrun. It caused serious accidents, and County was later condemned by Judge Mark Bishop as “*rigid and blinkered*.” Earning the Council — and by extension, us, the taxpayers — “*one of the largest fines ever imposed on a local authority for safety failings.*”³¹

It matters, because that same authority now asks to be trusted again.

The proposed route cuts across existing walking and cycling paths — including the new Greenways and well-used desire lines — forcing people to cross fast-moving buses at multiple points, many with poor sightlines or steep gradients. Fencing, added as protection, will narrow verges and make visibility worse.

²⁹ [cppf-cambourne-cambridge-alternative-6e.pdf](#)

³⁰ [Council in dispute over busway cost | Planning Resource](#)

³¹ [£6 million fine for ‘rigid and blinkered’ local authority | Six Pump Court](#)



Boundary runners crossing the proposed CtoC path behind Coton School [Referenced [Coton Orchard CtoC PoE p16](#)]

These are not details; they are matters of safety. The Applicant assumes the risks can be managed later through signs and barriers — but that was exactly the attitude the court condemned. Safety cannot be bolted on afterwards. A design that creates new conflict between people and vehicles is not safe; it simply moves danger to where people already are.

What happened to “*lessons learned*”?³²

Carbon Arithmetic [Referenced [Coton Orchard CtoC PoE p28](#)]

When the Council voted to apply for this Order, **Lucy Nethsingha** — then Deputy, now Leader of Cambridgeshire County Council — justified felling hundreds of trees in Coton Orchard “*to move (Cambridge) to a net-zero economy.*”³³ That same environmental claim has been repeated to this Inquiry: that the scheme will deliver “*a net reduction in carbon emissions.*” ([§59.3 p 13](#)) It is an extraordinary claim — to destroy a living carbon sink in the name of carbon reduction.

Professor Hirst, giving evidence for CPPF, concluded that the scheme would in fact, be a **net emitter of carbon**. When the County’s barrister pressed her to agree that if it was a “*good strategic fit with the LTCP*” (Local Transport and Connectivity Plan), a document shaped with the involvement of many of the same local authorities promoting this scheme — she unsurprisingly disagreed, saying:

“If something is a net emitter, that means, it’s implicit, that you are emitting more carbon than you would have done had you done nothing. You’re emitting more

³² [Guided Busway prosecution - statement | Cambridgeshire County Council](#)

³³ [Hundreds of trees to be felled for Cambridge bus route to tackle climate change | Environment | The Guardian](#)

carbon. I don't see how emitting more carbon is compatible with the words here 'low carbon'."

YouTube Time code: 01:35:53

That exchange distils the central flaw in the Applicant's case: the manipulation of words to fit the argument, rather than let the facts speak for themselves.

If "low carbon" can describe a net carbon emitter, then language itself has lost its integrity — and takes us all for fools.

Coton Orchard — A Traditional Orchard

The Applicant describes Coton Orchard as "*a recently designated County Wildlife Site*" whose trees are "*of more recent origin.*" (§79 p 19). It is another careful contortion of language to suit an agenda. The designation may be new, but the habitat it recognises is not: a living mosaic shaped over decades. All trees planted after the first Bramleys are, by definition, "of more recent origin" — yet most have stood for half a century or more.

The orchard holds hundreds of recorded species — bats, birds, invertebrates, fungi, mosses, lichens — including many nationally rare or scarce. It is a **Traditional Orchard**, a **UK Biodiversity Action Plan Priority Habitat**, one of the largest in Cambridgeshire.

Only the Applicant's paid experts dispute this. Tape measures and checklists in hand, they search for the one technicality that might let them say it is something less. But against them stand every independent authority who has looked without agenda:

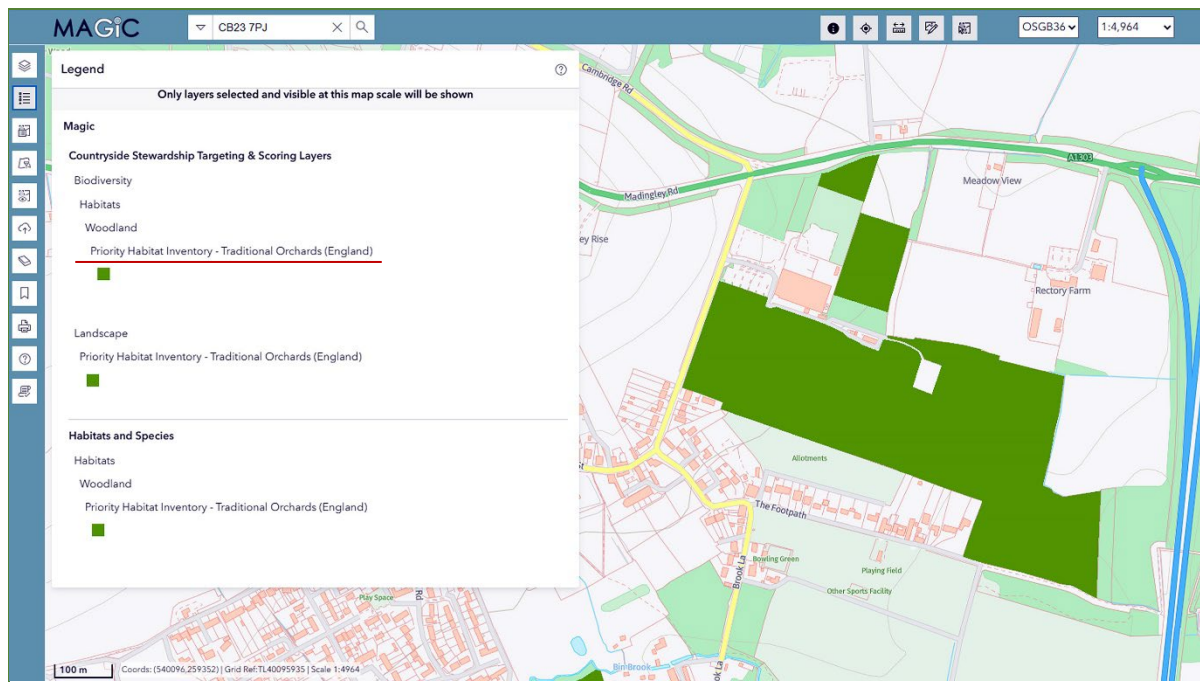
- DEFRA's MAGiC Map³⁴ (Multi-Agency Geographic Information for the Countryside)
- Natural England
- [The People's Trust for Endangered Species](#)
- [The Orchard Network](#)
- Wildlife Trust
- County's own [Local Nature Recovery Strategy Map](#)
- And the **County Wildlife Site Panel**³⁵ — a multi-agency group of ecologists, councils (including the Applicant, District & City Councils), recorders and specialists — who unanimously designated it a [CWS Traditional Orchard](#).

On one side, a hired effort to unpick a definition.

On the other, the settled judgement of those whose job is to know.

³⁴ <https://magic.defra.gov.uk/MagicMap.html>

³⁵ <https://www.wildlifebcn.org/sites/default/files/2018-06/Cambs%20%26%20Peterborough%20CWS%20handbook%20v6.pdf> Panel list p10



DEFRA MAP showing Coton Orchard as “Traditional Orchard” Priority Habitat Inventory

Mitigation and Compensation

The Applicant says that “*adverse impacts have been identified and mitigated*” ([§21 p 4](#)). Yet its own Ecology Report accepts that “*even taking account of the mitigation*” the loss within the Coton Orchard County Wildlife Site would remain “*significant at a County scale.*” That is their evidence, not ours.

Under [paragraph 186\(c\)](#) of the NPPF, development that causes the loss or deterioration of irreplaceable habitats — including veteran trees — “*should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.*”³⁶ Here, neither requirement is met.

1. Deterioration of veteran trees is certain

Within the Order limits stand six veteran Bramleys. The Applicant proposes to “protect” three and move the other three. But a veteran tree cannot be dug, dragged or replanted without deterioration. Its survival depends on mycorrhizal networks, soil structure and hydrology formed over many decades. The moment translocation is proposed, the NPPF test is triggered: deterioration is inevitable.

2. There are no “wholly exceptional reasons”

This is a local bus scheme, already served by existing routes, and it does not reach the Cambridge Biomedical Campus or South Cambridge, where the greatest demand lies. It is not a Nationally Significant Infrastructure Project. Nothing in this Inquiry approaches the threshold of “wholly exceptional reasons.”

³⁶ [cd1-11142 app tr141 - coton orchard tree review.pdf](#) 2.1 NPPF Definition p7

3. There is no suitable compensation strategy

Planting young trees and tending them until they are veteran is not compensation; it is a half-century prospectus. A sapling cannot replace hollow limbs, cavities, fungal webs or seasonal food plants relied upon by the species present today. Nor do **BNG credits at Lower Valley Farm — £1.25 million³⁷ in “off-the-shelf units,”** transferred in effect from the County to itself — recreate a century-old orchard mosaic. A credit replaces a metric, not a habitat.

4. The mitigation programme cannot be delivered

The Applicant’s veteran-tree timetable — “root prune Autumn 2025... root prune Autumn 2026... transplant Autumn 2027... ten years of aftercare” — cannot occur within the years it names. This Inquiry runs to November 2025; the Secretary of State’s decision follows months later. Until a TWAO is confirmed and CPO powers are in force, the Applicant has no lawful access to the land. As I put to Mr Allder, root pruning cannot begin in 2025. In reality, the earliest conceivable start is 2026 or 2027, **pushing any transplant into 2028 or 2029**. A mitigation plan that begins after the year it claims to finish is **undeliverable** within the stated timescale.

Public Voice and Trust & The Living Ledger

The County claims that those who live closest have “*the loudest concerns*” ([§20 p 3](#)). Naturally — because we are the ones who see most clearly what stands to be lost.

Those who live beside a landscape understand its value not in theory, but in the daily rhythm of their lives — in the sound of birds returning, in the seasons of blossom and fall. We notice the small absences first, and understand what they mean.

Sir Partha Dasgupta, On Natural Capital:

“Persistent, incremental encroachment into Nature is insidious because each move seems near harmless: a new bus lane cutting into an ancient orchard here... a bat habitat destroyed to make for additional housing in an urban sprawl elsewhere. The orchard will not return, ... and the bat population will die because it has nowhere to go. ... When an ecosystem is fragmented into parts, the supply of its services declines — the sum of the parts gives less than the whole.”³⁸

Nature’s accounts do not balance once its assets are written off — and that is what this Order would do: **spend an orchard, fragment a habitat, divide a living system**. This Inquiry is not simply about a busway; it is about **what we choose to count as value**.

³⁷ [GCP Infrastructure Programme Biodiversity Net Gain Approach](#) “50 units, a quantity likely to meet the immediate needs of the programme, would likely be in the range of **£1.25m – £1.75m.**”

³⁸ [On Natural Capital](#) p79

What is at stake is not simply the loss of trees, but the loss of perspective — a failure to see that the living world has worth.



Coton Orchard

And so, I end where I began — with Coton Orchard. Since 1950, England has lost more than 90% of its Traditional Orchards. What survives now are the last fragments of a once-common patchwork across our countryside, one that sustains some of our nation's now most endangered species.

Coton Orchard has endured for more than a century: through war, drought, frost and change. It asks only to continue doing what it has always done — shelter life, feed the soil, hold its place in the story of this landscape. **It asks only to go on living.**

Last Summary

The County opened this Inquiry declaring that “*the planning balance is tilted... in favour of the scheme.*” ([§21 p 4](#)). After 8 weeks of evidence — even with a thumb pressed firmly on that scale, the weight of fact has begun to right it.

- The *need* is unproven.
- The barrier to *growth* is self-made.
- Reasonable *alternatives* were not fairly or proportionately considered.
- The *guidance* system is undefined.
- The technology remains untested in open countryside.
- The *carbon* case fails its own arithmetic.
- The public *cost* outweighs any claimed public *benefit*.
- The *funding* is not *secured*.
- The *habitat* is irreplaceable.
- There are no *wholly exceptional reasons* for the scheme. [NPPF]
- There is no *compelling case in the public interest*. [CPO Guidance]
- And the figures?
— financial and environmental —
simply **do not add up**.

We are, each of us, custodians of this shared earth for only a moment in time.
The choices we make **decide** what remains for those who follow.
This moment was mine.

I have done my best to defend Coton Orchard —

“the ancient trees that preside over its unploughed grasses, the birds that feed upon its apples, the people who have loved it in the past and who love it still.”³⁹

I can only hope I was enough — that we were enough.

Inspectors — whether Madingley Hill Farms, the orchard, and all that it sustains endure beyond this moment now rests in *your* hands.

Thank You

³⁹ [The fight is on to save Coton Orchard](#)