

IN THE MATTER OF:

THE PROPOSED CAMBRIDGESHIRE COUNTY COUNCIL

CAMBOURNE TO CAMBRIDGE ORDER

ADDENDUM TO THE APPLICANT'S
CLOSING SUBMISSIONS

1. This note records the two oral additions made to the Applicant's written Closing Submissions.

Addition 1 – insert after paragraph 325

2. In his closing submissions, Mr Rob Sadler asserted on PDF p. 4 that section 149 of the Equality Act 2010 placed a duty to engage with a disabled landowner and he alleged that the Applicant was in breach of that duty.
3. This was not correct for two reasons.
4. First, Mr Sadler misunderstood section 149. This imposes a duty to have regard, not a duty to consult or a duty to achieve a particular outcome.
5. Secondly, not only were GCP aware of Mrs Sadler's disability, they consulted appropriately with Mr Sadler, his brother and their appointed agents, acting on behalf of Mrs Sadler. This is evidenced by James Franklin's Rebuttal Proof of Evidence at paragraph 2.5 on page 4 which expressly refers to revised design drawings which included crossing points designed to comply with disability access standards. See also PDF pp. 62 and 72 of Mr Fanklin's Rebuttal Proof of Evidence Appendices which show GCP's awareness of Mrs Sadler's disability during interactions. Therefore, there has been compliance with the public sector equality duty in section 149 of the Equality Act 2010.

Addition 2 – insert after paragraph 383

6. The closing submissions from PX Farms were received this morning after completion of our written submissions. We respond orally.
7. We make three main points.
8. Point 1. In respect of paragraph 5 of PX Limited’s submission, we ask you to note that the objector has no objection to the objectives of the scheme and the use of their land for the proposed travel hub.
9. Point 2. At paragraph 6 of the PX closing submissions it is submitted that the plans fail to incorporate adequate mitigation to address the visual and noise intrusion of the scheme on adjacent residential properties.
 - 9.1. Mitigation is proposed, in particular in the form of tree planting – see item 12 at CD 1-10.02 on p. 3.
 - 9.2. There is no evidence to indicate that there will be any adverse noise intrusion.
10. Point 3 – this is responding to paragraph 7 in the closing submissions.
 - 10.1. The applicant has taken such steps – they are set out in Mr Franklin’s POE at paragraphs 6.143 – 6.147.
 - 10.2. One can see from that evidence that it was PX who proposed a structure in relation in particular to a leasehold interest which demonstrates that there has been a material degree of engagement.
 - 10.3. That evidence is sufficient to fulfil and satisfy the guidance on negotiations set out at paragraph 2.2 of the MHCLG Guidance at CD 8-28.

**NEIL CAMERON K.C.
MATTHEW HENDERSON**

**Landmark Chambers,
180 Fleet Street,
London EC4A 2HG**

21st November 2025