

IN THE MATTER OF THE TRANSPORT AND WORKS ACT 1992

**AND IN THE MATTER OF THE TRANSPORT AND WORKS (APPLICATIONS AND OBJECTIONS
PROCEDURE) (ENGLAND AND WALES) RULES 2006**

REF: TWA/24/APP/03

**THE CAMBOURNE TO CAMBRIDGE ORDER
ACQUIRING AUTHORITY: CAMBRIDGESHIRE COUNTY COUNCIL**

CLOSING SUBMISSION OF PX LAND LIMITED

Introduction

1. Mr Peck who gave oral evidence to the Inquiry last month is out of the United Kingdom for business on 20th November 2025 and in his absence PX Land Limited provides this written closing submission to the Inquiry.

Summary of Evidence

2. PX Land and associated companies have incurred professional costs of £105,000 to date directly as a result of the Cambourne to Cambridge Order, and the proposal to acquire Doctors Field for the provision of a new travel hub building and park and ride site. These costs have been incurred to progress negotiations with Greater Cambridge Partnership and Cambridgeshire County Council (the Acquiring Authority) regarding access PX Land Limited's land, damage suffered to the land and to address negotiations and the formal compulsory procedure itself.
3. Negotiations have been protracted and have effectively stalled since 2022.
4. PX Land Limited has suffered damage to Doctors Field caused by archaeological digs which has disrupted land drainage. Despite an express provision of the licence requiring GCP to rectify any damage caused to the land within the term of the lease and before July 2024, no work has been undertaken and GCP have stated that it has no intention to carry out works for some 2 to 3 years.

5. PX Land Limited has no objection to the objectives of the Cambourne to Cambridge Order and the use of Doctors Field for a proposed travel hub.
6. However the present plans fail to incorporate adequate mitigation to reduce the visual and noise intrusion of the scheme on the adjoining residential properties and the adverse impact of additional traffic to the adjoining residential and agricultural occupiers and businesses.
7. The main objection of PX Land Limited to the Acquiring Authority's use of compulsory purchase powers is that the Acquiring Authority has not made sufficient nor reasonable steps to seek agreement for acquisition by negotiation prior to resorting to compulsory purchase procedure.

Submission

8. The Inquiry should note that reference to these negotiations is not intended to waive privilege as to the subject of the negotiations, but the manner in which they have been conducted.
9. Since 2022 the Acquiring Authority has not engaged constructively in negotiations and has repeatedly used the threat of the additional costs and delay that would be incurred and suffered by PX Land Limited should the issue of compensation under the subject of proceedings before the Upper Tribunal (Lands Chamber).
10. By these actions the Acquiring Authority is not using compulsory purchase powers as a tool of last resort but rather a tool to threaten and unreasonably pressurise PX Land Limited to accept terms for the acquisition of the land on terms that are more unfavourable than those one would achieve for the market value of the land as if sold by a willing seller, ignoring the fact that the acquisition is compulsory.
11. Despite the Acquiring Authority's representative at the Inquiry inviting PX Land to meet to seek to resolve matters at the time of Mr Pecks earlier submissions, no such meeting has taken place and the Acquiring Authority failed to respond to any of the proposed dates expressed by PX Land Limited for a meeting. It is apparent to PX Land Limited that the Acquiring Authority in this instance is has no genuine intent to negotiate. The Oxford English Dictionary defines negotiation as "the process of holding formal discussions with someone in order to reach an agreement or compromise."
12. There has been no attempt to reach an agreement or compromise, the Acquiring Authority is attempting to use the threat of the costs and delays of a referral to the Upper Tribunal (Lands

Chamber) to force PX Land Limited to transfer the land at an undervalue, against the spirit and guidance set out in the Crichel Down Rules.

Roythornes LLP

for and on behalf of PX Land Limited.

20 November 2025