

**Statement of Common Ground Between
Cambridge Past Present and Future /
Coton Parish Council and
Cambridgeshire County Council**

Draft: version: 2 19/09/2025

Transport and Works Act 1992

**The Transport and Works (Inquiries
Procedure) Rules 2004**

**The Cambourne to Cambridge
Order 202[#]**

**Applicant's Statement of Common Ground with
Cambridge Past Present and Future / Coton Parish Council**

Planning Inspectorate Reference	DPI/E0535/21/1
Author:	Cambridgeshire County Council

Version	Date
REV 1	19/09/25

Contents

1	Introduction	1
1.1	Purpose of this document	1
1.2	Parties to this Statement of Common Ground	1
1.3	Record of Engagement	1
2	Issues	5

1 Introduction

1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared in respect of the Cambourne to Cambridge Scheme (the “Scheme”) as part of the application made by Cambridgeshire County Council (the “Applicant”) to the Secretary of State for Transport, for a Transport and Works Act Order (TWAo) under sections 1, 3 and 6 of the Transport and Works Act 1992 (the “1992 Act”).
- 1.1.2 A detailed description of the Scheme can be found in Chapter 3 of the Applicant’s Environmental Statement (Doc Ref CD1-10.01).
- 1.1.3 This SoCG does not seek to replicate information which is available elsewhere with the application documents. All application documents referred to are available on the Inquiry website.
- 1.1.4 This SoCG has been produced to identify for the inquiry the main issues which are in dispute between the parties. SoCGs are an established means in the planning process of allowing parties to identify and focus on specific issues that may need to be addressed during the Inquiry.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared between (1) the Applicant and (2) Cambridge Past Present and Future / Coton Parish Council.
- 1.2.2 The Applicant is the Local Highway Authority for its administrative area for the strategic road network and has the necessary powers and duties to operate, manage, maintain, and enhance the local transport network.
- 1.2.3 Cambridge Past Present and Future is an independent charity found in 1928 to protect the historic city of Cambridge and its countryside setting from being harmed by development¹.
- 1.2.4 Coton Parish Council, located within the village of Coton, consists of nine elected Councillors and is served by a Parish Clerk².

1.3 Record of Engagement

- 1.3.1 A summary of the recent meetings and correspondence that has taken place between the Applicant and Cambridge Past Present and Future in relation to the application is outlined in **Table 2.1.1** below.

Table 2.1.1 Record of Engagement

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
20/08/2020	Meeting minutes	LHE Working Group – attended by, Greater Cambridge Partnership (GCP), Mott MacDonald, Cambridgeshire County Council, South Cambridgeshire District Council, Cambridge City Council, Cambridge Past Present Future (CPPF), Wildlife Trust, Natural England, Environment Agency, National Trust, Network Rail.

¹ Cambridge Past Present and Future (CPPF). Our History & Impact. Available online: <https://cambridgeppf.org/our-history-impact/> [Accessed 10 June].

² Coton Parish Council. Available online: <https://cotonpc.org/> [Accessed 10 June].

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
14/01/2021	Meeting minutes	NMU Working Group – attended by, GCP, Mott MacDonald, The British Horse Society, Shelford and District Bridleways Group, CAM Cycle, Local Access Forum and The Ramblers Association, Local Access Forum, Definitive Map Manager (Cambridgeshire County Council) and Cambridge Past Present and Future (CPPF).
23/02/2021	Meeting minutes	NMU Working Group – attended by, GCP, Mott MacDonald, Greater Cambridge Planning, Cambridge City Council, The British Horse Society, Shelford and District Bridleways Group, CAM Cycle, Local Access Forum and The Ramblers Association, Local Access Forum, Definitive Map Manager (Cambridgeshire County Council), CPPF.
23/02/2022	Email	WSP request for survey access to land owned by CPPF arrangement of a meeting. CPPF also provided comments to the Environmental Impact Assessment (EIA) Scoping for the scheme.
29/03/2022	Email	WSP sent a Land Interest Questionnaire (LIQ) and plan(s) to CPPF.
06/04/2022	Email	WSP sent an email reminder to CPPF to complete and return the LIQ.
07/04/2022	Email	James Littlewood (CPPF) confirmed the forms have been completed and posted.
22/09/2022	Meeting minutes	Active Travel Working Group – attended by, GCP, WSP, Atkins, Cambridge City Council, CPPF, The British Horse Society, CAM Cycle, Shelford and District Bridleways Group.
17/10/2022	Letter	GCP sent a letter to James Littlewood (CPPF) explaining that the TWA0 application is due to be submitted in early 2023 and that they seek compulsory powers to acquire your interests in land required for the scheme. GCP offered to discuss any concerns they may have regarding the scheme and that CBRE have been appointed property advisors to discuss terms for acquisition with affected persons.
28/11/2022	Meeting minutes	WSP and CPPF meeting discussing the proposed realignment at Coton to allow for a lessened impact within the orchard and initial outputs from the BNG Assessments.
17/01/2023	Meeting minutes	Discussion between WSP and CPPF - EA Consultation Meeting WFD
14/04/2023	Meeting	Mark Poynter (WSP) and Nick Giesler (WSP) met with James Littlewood (CPPF) at the Coton Countryside Reserve to discuss habitat creation and biodiversity opportunities. CPPF outlined plans for habitat enhancement, management, and the commercial offering of biodiversity units through BNG schemes. WSP had provided a summary of the scheme's biodiversity unit requirements in advance.
14/04/2023	Email	Nick Giesler (WSP) thanked James Littlewood (CPPF) for meeting and requested if he could use a note provided by CPPF in discussing the potential for Coton Countryside Reserve and

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		CPPF's thinking with respect to the BNG opportunity. James replied stating the note could be shared with GCP.
14/04/2023	Email	James Littlewood (CPPF) sent Nick Giesler (WSP) an attached plan showing CPPF land that would be subject to Compulsory Purchase Order (CPO) if the scheme proceeds. Nick Giesler (WSP) sent a link to further plans on the GCP website. James queried why the areas (13-128) and (12-127) required mitigation (to justify CPO) given the distance from properties and the extant of screening.
19/04/2023	Email	Nick Giesler (WSP) replied to James Littlewood (CPPF) stating the two areas (13-128) and (12-127) are required to allow both for screening of adjacent properties and to help integrate the Scheme into the landscape. A screenshot was provided to provide the context that clarifies the need for screening.
04/05/2023	Email	James Littlewood (CPPF) sent an email to GCP/WSP stating that they do not support the proposed landscaping and would challenge the CPO proposed for it. CPPF have a preferred solution and would be grateful to arrange a meeting to discuss these changes.
05/05/2023	Email	Jo Baker (GCP) replied to James Littlewood (CPPF) stating that we would be happy to consider constructive suggestions and requested an indication of their preferences ahead of a meeting.
05/05/2023	Email	James Littlewood (CPPF) sent an attachment of the proposed landscape changes that will be reviewed by Chris Carolan (WSP landscape team) ahead of a meeting.
05/05/2023	Email	GCP requested clarification from James Littlewood (CPPF) regarding his reference of "width". James replied stating it was meant as a question to ensure there is enough width for two-way vehicle movement including access to highway. Jo Baker (GCP) replied stating the team would look into it.
22/05/2023	Email	Jo Baker (GCP) emailed James Littlewood (CPPF) to explain that despite recent public assertions that alternative proposals received from CPPF have not been considered, amendments have been made to the scheme's alignment in response to CPPF's input and GCP will continue to engage to accommodate feedback wherever possible.
13/11/2023	Email	Discussion between CBRE and Henry Platts-Martin (Carter Jonas) who is the representative of a landowner. Heads of Terms, TWA0 acquisition plan and the general arrangement plan. On 14/12/2023 Henry Platts-Martin (Carter Jonas) requested a plan that goes with the Heads of Terms, CBRE sent this on the same day.
06/12/2023	Email	Sarah Nicholas (CPPF) sent a letter to GCP regarding the transport modelling for the scheme. GCP replied on 14/12/2023 and provided a link to the Local Model Validation Report for Steve Johnstone of Lawrence Walker Limited (Walker Engineering) to review.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
03/01/2024	Email	James Littlewood (CPPF) requested the latest scheme plans ahead of a village meeting. GCP provided a link to the plans.
03/05/2024	Letter	WSP sent a letter to CPPF who are recorded as having an interest in land and/or property affected by the scheme. Enclosed with the letter is a Request for Confirmation Questionnaire and plan(s) showing the extent of land that are believed to be of interest.
03/05/2024	Email	CPPF sent an email to GCP stating that the information on the form regarding their land interest was incorrect. GCP replied with an explanation of what was required on 07/05/2024. CPPF replied on 07/05/2024 requesting that the incorrect information on the form is corrected.
12/11/2024	Letter	Rule 15 Notice.

1.3.2 It is agreed that this is a non-exhaustive record of key meetings and other forms of consultation and engagement undertaken between the Applicant and Cambridge Past Present and Future since August 2020 in relation to issues addressed in this SoCG, it does not include the engagements that took place from 2017 to August 2020.

2 Issues

2.1.1 The Table below details the issues which are in dispute between the Applicant and CPPF / Coton Parish Council.

Table 3.1.1 – Issues

Issue	CPPF/CPC Position	Applicant Position
Need for transport improvements in Greater Cambridge.	It is agreed that there is a need to meet the objectives set for the Scheme, in particular, it is agreed that there is a need (1) to improve accessibility in the greater Cambridge region to support economic growth; (2) to deliver a sustainable public transport service between Cambourne and Cambridge; and (3) to improve the quality of life within surrounding areas.	
Whether the Scheme is supported by adequate transport modelling	See CD26-10-W2, SJ Proof at paras 2.01 – 2.26 and paras 6.02-6.16 CD26-10-W3, EL Proof at paras 4.1 – 4.2	<u>General Caveat</u> The Applicant provides a headline response and a headline reference. The evidence is not set out exhaustively and not all relevant references are given. The Applicant's position is that the Scheme is supported by adequate transport modelling. See Chris Whitehouse's Proof of Evidence CD26-01-APP-W6-1
Whether EWR is likely to have a significant effect on the need for and benefits of the Scheme and whether it has been adequately modelled	CD26-10-W2, SJ Proof at paras 3.0 – 3.14, paras 6.10-6.19	As stated in the Strategic Case Addendum [CD1-21.01, page 43, 7.2.12], and noted in the Independent Audit [CD8-27, page 72, section 7.1.15], CtoC and EWR are anticipated to complement each other as CtoC will serve locations along the corridor and connect to the city from the west, whilst EWR will link to Cambridge South, the Biomedical Campus and Cambridge station. If EWR is relieved the need and justification for the Scheme is unaffected.
Whether the Applicant's assessment of the economic benefits of the scheme, including the need for the Scheme to deliver planned housing growth, is flawed	CD26-10-W2, SJ Proof at paras 4.01 - 4.04 CD26-10-W3, EL Proof at paras 4.4 - 4.5	The Applicant considers the assessment of the economic benefits of the scheme, including the need for the Scheme to deliver planned housing growth, to be robust. See Chris Whitehouse's Proof of Evidence CD26-01-APP-W6-1
Whether the Applicant has carried out an adequate assessment of alternatives to the Scheme	CD26-10-W3, EL Proof at paras 3.1-3.18 and Appendix A CD26-10-W4, DW Proof at Section 7 CD26-10-W1-1, JL Proof at paras 3.3 – 3.20	The Applicant has carried out an adequate assessment of alternatives to the Scheme. See CD1-10.01 Environmental Statement, CD1-10.07 Environmental Statement (Addendum 2 and clarifications) Joe Baker POE CD26-01-APP-W1-1
Whether the Applicant's BNG Assessment is adequate	CD26-10-W4, DW Proof at Section 5	The Applicant considers the BNG Assessment to be adequate. Biodiversity Statement and Biodiversity Net Gain Assessment (TR5.7) [CD1-11.05 TR5.07 Ian Ellis' Proof of Evidence CD26-01-APP-W13-1

Whether the Scheme complies with relevant national and local policies in respect of ecology	CD26-10-W4, DW Proof at Section 8	The Applicant believes that the Scheme complies with relevant national and local policies in respect of ecology Ian Ellis' Proof of Evidence CD26-01-APP-W13-1 Paola Reason's Proof of Evidence CD26-01-APP-W12-1
Whether the Applicant's assessment of the CO2 emission benefits of the Scheme is flawed and whether the Scheme will be a substantial net CO2 emitter	CD26-10-W5 Louise Hirst	The Applicant considers its assessment of the CO2 emissions of the Scheme to be robust. CD26-01-APP-W3-2 Appendix C – Carbon Assessment Update (page 17) Saunders POE Appendices CD26-01-APP-W3-2
The extent of harm caused by the Scheme in landscape and visual terms and to the Green Belt	CD26-10-W1-1, JL Proof at Sections 6 and 7	The Applicant has carried out a robust assessment of the impact of the Scheme on the Green Belt. The Scheme is only partially in the Green Belt. Where it is in the Green Belt there is generally limited conflict with the purpose of including land and low adverse effects on openness. Very Special Circumstances have been demonstrated. Ralph Lewis' Proof of Evidence CD26-01-APP-W10-1 Green Belt Assessment CD 1-18.
Whether the maintenance and access track falls within the scope of the TWAO and, in any event, whether there is a need for, or benefit from, its delivery	CD26-10-W1-1, JL Proof, paras 7.25 - 34	The Emergency and Maintenance Access Track is a core part of the Scheme within the scope of the proposed order. Delivery of the track is essential and beneficial. See John Lonergan's Proof of Evidence CD26-01-APP-W8-1
Whether the proposed replacement open space is acceptable	CD26-10-W1-1, JL Proof, Section 8	Acceptable replacement open space land will be provided. Ralph Lewis' Proof of Evidence CD26-01-APP-W10-1 Open Space Assessment CD1-19
Whether there has been adequate engagement by the Applicant in relation to the proposed route alignment and the land required	CD26-10-W1-1, JL Proof, paras 7.35 - 39	The Applicant has undertaken adequate engagement in relation to the proposed route alignment and the land required. James Franklin's Proof of Evidence CD26-01-APP-W7-1
Whether, having regard to the need in principle need to improve accessibility in the Greater Cambridge region to deliver a reliable public transport service to serve housing growth in Cambourne (which is accepted by CPPF/CPC), the CPPF Alternative Scheme would:		

- Be feasible in engineering terms	CD26-10-W2, SJ Proof at paras 5.04-5.07, Appendix F and H CD26-10-W3, EL Proof at paras 5.1 – 5.6 and Appendix A	The CPPF Alternative Scheme is not considered to be feasible in engineering terms. See CD26-01-APP-W8-4 John Lonergan's Rebuttal, CD26-01-APP-W8-5 John Lonergan's Appendix to Rebuttal: Appendix 1 – Further Assessment of CPPF Alternative Scheme (page 3) J Lonergan to review/respond
- Be safe	CD26-10-W2, SJ Proof at paras 5.08-5.10 and Appendix G and H	The CPPF Alternative Scheme is not considered to be safe. See CD26-01-APP-W8-4 John Lonergan's Rebuttal, CD26-01-APP-W8-5 John Lonergan's Appendix to Rebuttal: Appendix 1 – Further Assessment of CPPF Alternative Scheme (page 3) J Lonergan to review/respond
- Cause less harm to ecological receptors than the Scheme	CD26-10-W4, DW Proof at Sections 4, 5, 6 and 7	It has not be demonstrated that the CPPF alternative Scheme would cause less ecological harm to receptors and the Applicant had identified a number of clear risks where greater harm is likely. Ian Ellis' Proof of Evidence CD26-01-APP-W13-1
- Be effective in meeting the objectives of the Scheme	CD26-10-W3, EL Proof at Appendix A	The CPPF Alternative Scheme does not meet the objectives of the Scheme. Jo Baker's Rebuttal CD26-01-APP-W1-4
- Preserve the significance of heritage assets	CD26-10-W1-1, JL Proof, paras 7.1 – 7.5	The Applicant disagrees with the statement that the CtoC Scheme would result in harm to Church of St Peter and other listed buildings within Coton Conservation Area (CD26-10-W1-1, Para 7.2); however, the Applicant agrees that the conservation area would be harmed (cf. CD1-11.07.02, paras. 7.4.20 – 7.4.76, pp. 97 - 103; and CD26-01-APP-W2-1, section 5.11, pp. 49 - 50 on St Peter's, and section 5.12, p. 50 on Coton Conservation Area) The Applicant disagrees with the statement that harm to listed buildings in Coton would be avoided by the Alternative Scheme (CD26-10-W1-1, Para 7.3) because the CtoC Scheme would not harm any such listed buildings. However, the Applicant agrees that the Alternative Scheme would avoid less than substantial harm to the conservation area (CD26-01-APP-W2-1, para. 6.2.17, p. 66). The Applicant disagrees with the statement that there would be no harm to American Military Cemetery Grade I registered park and garden (CD26-10-W1-1, Para 7.5) as this asset would experience less than substantial harm. The Applicant also notes also that there would be less than substantial harm to both Grade II* listed Memorial and Attached Walls,

		Steps and Pool Surround at American Military Cemetery, and Grade II* listed Madingley Mill, at Mill Farm, Madingley Hill (CD26-01-APP-W2-1, section 5.10, pp. 46 - 46; and paras. 6.2.10 – 6.2.12, pp. 65 - 66).
- Be in compliance in principle with relevant development plan policy	CD26-10-W1-1, JL Proof, Section 5	The CPPF Alternative does not comply in principle with the development plan.
- Be less harmful in Green Belt and landscape and visual terms	CD26-10-W1-1, JL Proof, Sections 6 and 7	It has not been demonstrated that the CPPF Alternative would, overall, deliver any material improvement over the Scheme on the Green Belt and/or in landscape and visual terms.
Whether, having regard to the above matters, the Scheme (including the use of CPO powers) is justified		The Scheme, including the use of CPO powers, is justified.

Signed on behalf of Cambridgeshire County Council:

Name:.....

Authorised Signatory

Dated:.....

Signed on behalf of Cambridge Past Present and Future / Coton Parish Council:

Name:.....

Authorised Signatory

Dated:.....