

Appendix A: Email from Adam Richards (Womble Bond Dickinson) dated 29 July 2025

1. Confirms that no formal records (agendas, minutes, or notes) exist from meetings with J & WR Sadler prior to April 2024.
2. Includes statement: "Where formal records exist... this has already been provided."

Rob Sadler

From: Rob Sadler
Sent: 29 July 2025 11:08
To: Adam Richards
Cc: Franklin, James @ London HH; O'Connor, Brendan @ London HH; Victoria Redman; UK - Cambourne to Cambridge; Joanna Vincent; Brenda Taplin; TRANSPORTINFRASTRUCTURE; dave.candlish@dft.gov.uk; Rachel.Dominey@dft.gov.uk
Subject: RE: Cambourne to Cambridge TWAO Application - Correspondence [WBDUK-AC.FID124253567]

Dear Adam,

Thank you for your response.

To be absolutely clear, your second paragraph confirms that the Applicant and its consultants are unable to produce any documentary records including agendas, minutes, file notes or otherwise of meetings held with John and Wendy Sadler over a period of more than 10 years. We are now expected to take it on trust that appropriate engagement occurred, despite the complete absence of a written trail. That is an extraordinary failure for a statutory body with compulsory powers and raises serious concerns about accountability and transparency. These issues will be highlighted in my Proof of Evidence.

You also refer to a draft Statement of Common Ground. As of Today's submission deadline, no such draft has been received. It is not reasonable or realistic to expect constructive engagement on a formal document when no version has been shared in time. I therefore wish to make it absolutely clear both to you and the inspector that I will not be participating in the production of a statement of common ground. The opportunity to do so has passed and I do not wish for the process to be reopened or extended.

Please note that I am on leave and will not be responding to emails for the next couple of week.

Regards
Rob Sadler
07968 550 458

From: Adam Richards <Adam.Richards@wbd-uk.com>
Sent: 29 July 2025 09:26
To: Rob Sadler <rsadler@mandsestates.com>
Cc: Franklin, James @ London HH <james.franklin@cbre.com>; O'Connor, Brendan @ London HH <brendan.oconnor@cbre.com>; Victoria Redman <victoria.redman@wbd-uk.com>; UK - Cambourne to Cambridge <c2c@wsp.com>; Joanna Vincent <joanna.vincent@gateleyhamer.com>; Brenda Taplin <brenda.taplin@gateleyhamer.com>; TRANSPORTINFRASTRUCTURE <transportinfrastructure@dft.gov.uk>; dave.candlish@dft.gov.uk; Rachel.Dominey@dft.gov.uk
Subject: RE: Cambourne to Cambridge TWAO Application - Correspondence [WBDUK-AC.FID124253567]

Dear Rob,

Thank you for your email below.

In relation to redactions, our client is required to redact personal information under the Data Protection Act 2018 and by the Department for Transport. Therefore, any material that is appended to proofs of evidence which our client produces will be redacted to give effect to this. The document we previously sent to you shows the redactions we

intend to make on the appendices which are relevant to you. No material information will be redacted and therefore the content of such will be preserved.

In relation to the further documentation and correspondence you have requested, where formal records exist, we understand that this has already been provided to you or was created by the Sadler family.

We will shortly be sending you a draft Statement of Common Ground (SoCG) for your consideration. This contains a high-level summary of communications between the parties to date. Noting your planned holiday, we would be grateful if you could provide us with any amendments to the draft SoCG as soon as you are able to do so. We will be providing an update of the current position on SoCGs to the Inspectors today which, as you may recall, was the initial deadline to submit SoCGs where possible.

We look forward to hearing from you.

Kind regards,
Adam

Adam Richards
Solicitor
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From: Rob Sadler <rsadler@mandsestates.com>
Sent: 28 July 2025 09:57
To: Adam Richards <Adam.Richards@wbd-uk.com>
Cc: Franklin, James @ London HH <james.franklin@cbre.com>; O'Connor, Brendan @ London HH <brendan.oconnor@cbre.com>; Victoria Redman <victoria.redman@wbd-uk.com>; UK - Cambourne to Cambridge <c2c@wsp.com>; Joanna Vincent <joanna.vincent@gateleyhamer.com>; Brenda Taplin <brenda.taplin@gateleyhamer.com>; TRANSPORTINFRASTRUCTURE <transportinfrastructure@dft.gov.uk>; dave.candlish@dft.gov.uk; Rachel.Dominey@dft.gov.uk
Subject: RE: Cambourne to Cambridge TWAO Application - Correspondence [WBDUK-AC.FID124253567]

Dear Adam,

Thank you for your email dated 24th July. I have only just picked it up as I have been on leave. Please note that I am now on leave again for the next 2 consecutive weeks.

Thank you for your lesson in law. Should your client intend to refer to any correspondence I have written in their proof of evidence, please ensure that it is reproduced in full without redactions or selective quotations so the context is preserved. Kindly confirm this will be the case.

Whilst writing, please confirm whether your client or any consultants acting on their behalf directly or indirectly can provide any record whether in the form of agendas, minutes or even basic note taking of any meeting involving J&WR Sadler from the inception of the Cambourne to Cambridge busway project in 2014 up to the 9th April 2024. This request has been made several times before and the GCP has ultimately claimed

that no such documentation exists. John and Wendy Sadler are now in their late 70's and were not legally or professionally represented with their dealings with the GCP for many of the meetings. They had every reason to expect that they would be treated with professionalism, care, and respect.

This lack of record keeping is deeply concerning. The Greater Cambridge Partnership is a statutory body exercising powers with significant legal and financial consequences including the use of Compulsory Purchase. The failure to maintain formal records over a ten-year period, particularly where landowners are directly involved and property rights are at stake, raises serious questions about procedural fairness, transparency, and accountability. It could also place the integrity of the consultation and negotiation process in doubt. Such omissions may have legal implications for the validity of the Applicants case, especially where it claims to have engaged meaningfully with affected landowners.

If I do not hear from you by 4th August 2025, I shall assume that no documentation exists and that your client and its consultants are unable to evidence any engagement with J&WR Sadler during that 10 year period.

Finally, please note, as per my email dated 14th May 2024, that the W3W reference was provided as a general guide only and will need to be verified.

Regards

Rob Sadler
07968 550 458

From: Adam Richards <Adam.Richards@wbd-uk.com>
Sent: 24 July 2025 16:56
To: Rob Sadler <rsadler@mandsestates.com>
Cc: Franklin, James @ London HH <james.franklin@cbre.com>; O'Connor, Brendan @ London HH <brendan.oconnor@cbre.com>; Victoria Redman <victoria.redman@wbd-uk.com>; UK - Cambourne to Cambridge <c2c@wsp.com>
Subject: Cambourne to Cambridge TWA0 Application - Correspondence [WBDUK-AC.FID124253567]

Dear Mr Sadler,

I am writing to let you know that the Applicant intends to refer to the attached correspondence in the proofs of evidence which we will submit to the forthcoming public inquiry. Copies of this will also be included as appendices to the proofs of evidence. You have marked the correspondence as "Without Prejudice". However, we do not consider the correspondence to be confidential and believe it can be referred to in evidence. This is because it is not a communication for the purposes of facilitating a settlement. The privilege of 'Without Prejudice' only applies to statements made in a genuine attempt to settle a dispute.

The Applicant needs to refer to this correspondence in the proofs of evidence to explain to the Inspectors how they have made attempts to negotiate with you as well as demonstrate the points of dispute between you. We do not consider that your labelling of correspondence as "Without Prejudice" has any legal or other effect. For the avoidance of doubt, we confirm that we will not refer to any sensitive or commercial information you might have shared and you will see the redactions we have made in this respect. This includes, for example, your personal mobile number, issues relating to the health of your relatives or anything relating to your fees. If anything in the email is unclear or you wish to discuss this further, please don't hesitate to contact me.

Kind regards,
Adam

Adam Richards
Solicitor
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Appendix B: Email from the Applicant dated 10th October 2024

1. The Applicant stated that they had only met the Sadlers twice up to 2024.
2. That the design of the scheme was “subject to 4 public consultations, and landowners have had the opportunity to input during that process.”
3. Confirming design freeze since March 2023.

Rob Sadler

From: Greater Cambridge Partnership <hello@greatercambridge.org.uk>
Sent: 10 October 2024 16:28
To: Rob Sadler
Cc: Will.Gullett@cbre.com; mike.davey@cambridge.gov.uk; Cllr Lucy Nethsingha; bridget.smith@councillor.online; inquiryappeals@planninginspectorate.gov.uk; cllr.fane@scambs.gov.uk; 'Dr Nik Johnson'; cllr.bridgetsmith@scambs.gov.uk; pippa.heydings.mp@parliament.uk
Subject: Cambourne to Cambridge busway

Dear Mr Sadler,

Apologies for the delay in responding to your correspondence of Monday 16 September – unfortunately it arrived just as I departed on leave. As such I believe Tony Taylorson has provided my response to your queries from 22 August. I will now pick up the further points raised in your email.

The Cambourne to Cambridge scheme has been under development for many years, through numerous consultations which led to a preferred route being agreed in 2021. During this time, officers have met with representatives of your family on a number of occasions. We have records of at least four face to face meetings that have taken place - *there were minuted meetings in 2020 and 2024 and site visit meetings in 2021 and 2024*. When we have written to your family, we have offered to meet and should we have had requests to discuss specific matters these would have been scheduled. We have also had regular dialogue, primarily with Mr Stuart Sadler, about access to surveys and, again, should a request for a meeting have been made we would have been happy to oblige.

In 2021, when a preferred route was agreed, we confirmed with your family, as with other land owners, that we would support professional representation in line with best practice.

Re CBRE minutes, the comments and actions that you have provided have been accounted for and have informed the more recent dialogue.

I am happy to answer your query regarding scheme design. The alignment of the project, which the Greater Cambridge Partnership (GCP) Executive Board agreed was the Preferred Route in July 2021, was fixed to enable the EIA process. This was further refined to inform the scheme plans submitted to the Cambridgeshire County Council (CCC) Full Council meeting in March 2023. This is not a formal Design Freeze, as there is scope for matters such as crossing points and detailed design to be refined within the limits of deviation, but it does not allow for a full realignment of the scheme.

With regards to scheme design, that alignment was subject to four public consultations and all landowners have had the opportunity to input during that process.

Please could you please provide more detail to your assertion in your email of 16 September suggesting that your family or others are being left behind, as CBRE have been engaging with all landowners including your family?

The issue of the potential Madingley reservoir is well understood and has been the subject of discussion between CCC and both parties are agreed on the need to ensure that the two schemes - neither of which currently has planning consent - can proceed without conflict.

You will understand that it is not appropriate for us to discuss negotiations with other landowners but with regards to the issues raised by your family, CBRE will be in touch with you on this matter.

The issue regarding to the terms offered to landowners was addressed in our letter of 25 September. However, to be clear, where a lease has been offered, the GCP has entered into an agreement with such party so they

have certainty if the scheme progresses. As previously indicated, CBRE will be pleased to discuss further if you wish to seek an agreement.

We have also responded to Coton Parish Council and will continue to engage with them directly as we have done for many years.

Your sincerely

Jo Baker
Project manager

[Greater Cambridge Partnership](#)
hello@greatercambridge.org.uk | [01223 699906](tel:01223699906)



Appendix C: Extract from the Applicant's Draft Statement of Common Ground
(dated 30
July 2025)

1. Includes the so-called "Record of Engagement" table.
2. Demonstrates lack of any structured or meaningful dialogue with the Sadler family over a 10-year period.
3. Contains factual errors (e.g. referencing Rob Sadler before his involvement began in April 2024) and irrelevant entries.

Statement of Common Ground Between The Sadler family and Cambridgeshire County Council

Draft: version: 1 / Dated 30/7/2025

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
The Sadler family**

Planning Inspectorate Reference	
Application Document Reference	
Author:	Cambridgeshire County Council

Version	Date
REV 1	30/7/2025

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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 (ES Main Report) (Doc Ref [CD1-10.01, pages 24 to 37]).
- 1.1.3 This SoCG does not seek to replicate information which is available elsewhere within the application documents. All application documents referred to are available on the Inquiry website here: www.gateleyhamer-pi.com/en-gb/c-to-c/.
- 1.1.4 This SoCG has been produced to confirm to the Inquiry and Secretary of State where agreement has been reached between the parties to it, and where agreement has not yet been reached. 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) The Sadler family.
- 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 The Sadler family owns land which is affected by the Scheme.

1.3 Terminology

- 1.3.1 Within the table in Section 3, Issues of this SoCG, the terminology is as follows:
- "Agreed" indicates area(s) of agreement.
 - "Under Discussion" indicates area(s) of current disagreement where resolution remains possible, and where parties are continuing to discuss the issue(s) to determine whether they can reach agreement by the end of the Inquiry; and
 - "Not Agreed" indicates a final position for area(s) of disagreement where the resolution of the divergent positions will not be possible, and parties agree on this point.
- 1.3.2 It can be assumed that any matters not specifically referred to in Section 3 of this SoCG are not of material interest or relevant to The Sadler family and therefore have not been the subject of any discussions between the parties. As such, those matters can be read as agreed only to the extent that they are either not of material interest or relevance to The Sadler family.

2 Record of Engagement

2.1.1 A summary of the recent meetings and correspondence that has taken place between the Applicant and The Sadler family 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
09/03/2017	Email	Note confirming Crome Lea Farmhouse ownership and to send information to residence in Peterborough.
15/03/2017	Email	Response to above email re options.
17/03/2017	Email	Request for options assessment report.
12/04/2019	Letter	Letter from GCP (Peter Blake) to Mr Stuart Sadler offering a meeting
27/01/2020	Meeting	Austin Nwadike, Project Manager and John Wetton, Transport advisor in attendance for GCP. 5 issues raised: <ul style="list-style-type: none"> - Severance of farm (proximity to business park) - Graves including family intention to move these - Land drainage - Farm access - Mortgage / loan on land.
19/05/2021	Telephone	Calls between GCP (Sarah Prentice, Jo Baker) and Mr Stuart Sadler regarding survey access, drainage and general project matters
26/05/2021	Meeting	Site visit with Jo Baker and Mr Stuart Sadler
29/03/2022	Letter	Letter from WSP to Wendy and John Sadler containing a Land Interest Questionnaire (LIQ) and plan showing the extent of land the Sadler family are believed to have an interest in.
06/04/2022	Letter	WSP sent a follow up reminder email to both Wendy and John Sadler to complete the LIQ.
07/04/2022	Email	Response from Wendy Sadler which stated "Until such a time we have been formally approached we will not be providing any information. At such time, we will appoint an agent to deal with such matters".
07/04/2022	Email	Response from John Sadler requesting a formal approach to the Land Interest Questionnaire Response
21/07/2022	Request	Survey request – Geophysics & Trenching
26/08/2022	Request	Consent but refer to agent (Bidwells)
15/09/2022	Email	Licence circulated
23/09/2022	Email	Licence chaser re no Bidwells response.
01/12/2022	Access licence agreement	Agreement to allow survey access under licence.
17/01/2023	Follow-up contact	Email follow-up.
22/02/2023	Proposed heads of terms (HoTs) and valuation shared	Included draft agreement for both freehold and tenanted land.
08/03/2023	Holding response from Bidwells	Acknowledgement of receipt, no detailed feedback.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
06/04/2023	Email	Bidwells sent an email to CBRE requesting compensation to the Sadler family after damage caused by the recent archaeological trenching.
08/08/2023	Internal note of no reply from Bidwells	Noted for file due to lack of response.
07/09/2023	Email from R Sadler advising he will now act for family	Change in representation.
25/01/2024	Landlord Email – Quantum of Land	Note from Savills re surrender offer and dialogue.
23/02/2024	Web enquiry re route	Web enquiry re plan request
23/02/2024	Email	Wendy Sadler request for a map of the new bus route. GCP confirmed CBRE will be in touch to share the potential revisions to plans and a map.
28/02/2024	Confirmation re route.	Confirmation that route has not changed significantly.
12/03/2024	Email re Land Acquisition & Design	General Arrangement & HoTs plan circulated, offer of a meeting
15/03/2024	Acceptance of meeting offer	Meeting dates proposed.
9/04/2024	Meeting	Meeting between CBRE, J & W Sadler plus Robert and Stuart Sadler. Discussed various matters including burial site.
10/04/2024	Thank you – Site Meeting.	Thank you for meeting.
16/04/2024	Actions from Site Meeting	Minutes and actions outlined.
26/04/2024	Email from R Sadler	Minutes, fees and next steps.
29/04/2024	Email from CBRE	Fee cap set, note that no further surveys currently planned, comment on rate for claimant & requesting rationale for needing to engage a transport planner
03/05/2024	Letter	Letter from WSP to John and Wendy Sadler stating that they are recorded as having an interest in land and/or property affected by the scheme.
14/05/2024	Email from R Sadler	Contents related to: Fees, burial site location, crossing points and transport planner.
28/05/2024	Email from R Sadler	Further note re human remains
28/05/2024	Email to R Sadler re busway location.	Clarity sought on busway location.
28/05/2024	Email from R Sadler	Further note re email acknowledgement.
29/05/2024	Email to R Sadler re busway adjustment for burial	Clarification sought on preferred direction shift of busway.
29/05/2024	Email from R Sadler	Response about moving burial site.
11/06/2024	Email from CBRE	Response to email 14 May 2024.
03/07/2024	Email from R Sadler	Request for site meeting.
10/07/2024	Email from R Sadler	Site meeting chaser.
12/07/2024	Email from CBRE	Email re alignment and meeting.
12/07/2024	Response from R Sadler	Response re alignment and meeting
12/07/2024	Email from CBRE	Response to R Sadler re burial site.
16/07/2024	Email from CBRE	Meeting dates proposed

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
17/07/2024	Meeting acceptance from R Sadler	Meeting date accepted. GCP invited to also attend.
26/07/2024	Site Visit	Site marked out.
29/07/2024	Email from R Sadler re alignment	Concerns re alignment and proximity to burial reflecting on site visit.
01/08/2024	GCP acknowledgement	Acknowledgement of 29 July email.
06/08/2024	Electronic Letter from GCP to R Sadler	Burial site location, CPO possibility, proposed crossing point location and responses to various requests for information
22/08/2024	Email from R Sadler	Marking out on the ground, 6-7m from busway.
16/09/2024	Email from R Sadler	Chaser to 22 Aug email: <ul style="list-style-type: none"> - Burial site - Affected Water main - Crossing points - Lack of progress on negotiations - Coton Parish Council position
16 /09/2024	Email to R Sadler	Holding email response to 16 Sept email
25/09/2024	Email from R Sadler	Email response re TWAO. MPs cc'd into email.
25/09/2024	Acknowledgement from GCP	Acknowledgement email to R Sadler.
10/10/2024	Email to R Sadler – scheme design query	Response to 16 Sept email
15/10/2024	Email from R Sadler	Alignment, minutes and request for detailed drawings and Heads of Terms.
31/10/2024	Revised HoTs issued following site visit	Update to reflect site meeting and specific issues raised.
07 /11/2024	Email from R Sadler	<ul style="list-style-type: none"> - R Sadler discussion points: Requested April meeting minutes - Long leasehold Crossing points - Drawing detail
07/11/2024	Draft redline plans shared with notes	Clarification of land take.
12/11/2024	Letter	Rule 15 Notice.
22/11/2024	Updated HoTs issued	Further refinement of commercial terms.
27/11/2024	Email to R Sadler re issues raised & offer of meeting.	Meeting suggestion.
29/11/2024	CBRE note confirming ongoing engagement	Internal file note of negotiation status.
17/03/2025	TWAO notification	Notification re Statement of Case & email service.
17/03/2025	TWAO acknowledgement	Response re environmental impact.
18/03/2025	Email to R Sadler	Acknowledgement of position.
18/03/2025	Response from R Sadler	Acknowledgement that a busway from Cambourne to Cambridge is needed but considers that the proposed 1.5km section between Long Road / Madingley Mulch doesn't offer good value for money and believes the on road alternative is the better option.

2.1.2 It is agreed that this is an accurate record of key meetings and other forms of consultation and engagement undertaken between the Applicant and The Sadler family in relation to issues addressed in this SoCG.

3 Issues

3.1 Issues agreed, not agreed or under discussion

3.1.1 Table 3.1.1 below details the issues which have been agreed, not agreed or are under discussion between the Applicant and The Sadler family.

Table 3.1.1 - Issues

Issue No.	Issue	Document Reference	The Sadler family's Position	Applicant's Position	Status	Date status confirmed
1.	Cost benefits	Statement of Case	The estimated cost of £220 million, demands robust justification and scrutiny. The alternative route that runs adjacent to the existing highway corridor between Madingley Mutch and the M11 would avoid the need for major new infrastructure and lower costs by well over £100 million.	The estimated cost of the scheme is £192,284,900 as detailed in the Estimate of Costs [CD1-08]. The Applicant has reviewed the alternative proposed by CPPF and the Applicant does not consider it to be viable for the reasons set out in the CPPF Alternative Scheme – Engineering Assessment [CD9-31].	Not Agreed	
2.	Loss of green belt land	Statement of Case	The proposed alignment would result in significant loss of Green Belt land. The Council acknowledges environmental damage but fails to establish the "very special circumstances" required to justify this harm, as mandated by national planning policy. Given the availability of a viable on-road alternative, this environmental destruction is not justified.	The Applicant has produced a Green Belt Assessment [CD1-18] which includes Section 9 where "very special circumstances" are covered in detail [CD1-18, pages 61 to 65]. The Applicant concludes, having established that the Scheme is inappropriate development in that it will not preserve the openness of the Green Belt and does conflict with certain purposes of including land within it, that it was therefore necessary to consider whether "very special circumstances" exists to support the Scheme and its development. As set out within the Green Belt Assessment [CD1-18] and the Applicant's Planning Statement [CD1-15] very special circumstances are considered to apply to the Scheme, including: <ul style="list-style-type: none"> The economic, social environmental and transport benefits of the Scheme to the local and wider communities; Accessibility to the Green Belt as a result of the new green infrastructure that will be provided by the Scheme; Lack of alternative options that would not harm the Green Belt; and The compelling need for the Scheme. Full details of why the Applicant consider "very special circumstances" exist for the Scheme can be found at paragraphs 9.5.24 to 9.5.38 of the Planning Statement [CD1-15, pages 156 to 159]. These benefits are considered by the Applicant to be sufficient to clearly outweigh any harm to the Green Belt and any other harm as identified within the Green Belt Assessment [CD1-18] at Section 9.5 of the Planning Statement [CD1-15]. When these documents are read in conjunction with each other, the Applicant considers that "very special circumstances" are met. The Scheme benefits from the presumption in favour of sustainable development, also supported by national, regional and local policies and therefore is considered justified. As noted above the Applicant has reviewed the alternative proposed by CPPF and does not consider it to be viable for the reasons set out in the CPPF Alternative Scheme – Engineering Assessment [CD9-31].	Not Agreed	
3.	Consultation and decision-making process	Statement of Case	Serious concerns regarding the GCP's approach to transparency and engagement have remained unanswered and are now compounded by the conduct documented in the Council's Statement of Case.	The record of engagement is detailed in section 2 of the SOCG which demonstrates that there has been ongoing engagement since 2017.	Not Agreed	
4.	Failure to consider on-line alternative	Statement of Case	The GCP have dismissed alternatives including the CPPF route. There should be a detailed, side-by-side assessment of this alternative before allowing the current scheme to proceed.	Please refer to the Applicant's position as stated under item 1.	Not Agreed	
5.	Burial site	Correspondence	The burial site is believed to be at What3Words reference Violin Veal Stuck	A site visit was undertaken on 26/7/24 attended by Mr Rob Sadler, GCP and CBRE during which the extent of the proposed busway was set out on site and during which Mr Sadler identified a location for the burial site which lies within scheme Order limits. It was previously noted (14/5/2024) by Mr Sadler that the burial site was at a location with What3Words reference Violin Veal Stuck which lies approx. 0.7 metres outside the order limits. A What3Words location of Shots Foam Hurry was previously provided by the Sadler family at a	Under Discussion	

Issue No.	Issue	Document Reference	The Sadler family's Position	Applicant's Position	Status	Date status confirmed
				meeting in January 2020, which was further from the proposed busway route, but it is noted that the Sadler family now believe this to be incorrect. During the January meeting the Sadler family informed GCP that they intended to move the caskets. The Applicant recognises the sensitivity of this site and proposes to continue dialogue with the Sadler family as the project progresses.		
6.	Proposed busway crossing points	Objection	The Scheme would sever the working farm, which is said to require regular movement between dwellings, fields and the farmyard. Two crossings were previously discussed; one was later omitted. The proposed crossing is considered poorly located and impractical for daily use.	Crossing points are provided for in the design and formed part of discussions between the Sadler family and the Applicant's representative, CBRE. Following comments received at a site meeting on 26 July 2024 the previous crossing point location was amended to the currently proposed location. The Applicant remains open to further engagement on proposed crossing point locations as part of agreement or detailed design discussions.	Under Discussion	

Signed on behalf of Cambridgeshire County Council:

Name:.....

Authorised Signatory

Dated:.....

Signed on behalf of The Sadler family:

Name:.....

Authorised Signatory

Dated:.....

Appendix D: Email from Rob Sadler to CBRE dated 14 May 2024

1. Provides What3Words reference for burial site.
2. States explicitly that the location is a guide and must be verified during a site visit.

Rob Sadler

From: Rob Sadler
Sent: 14 May 2024 16:01
To: Church, Henry @ London HH; Gullett, Will @ London
Subject: FW: C2C Sadler. without prejudice
Attachments: A Plan A.pdf

Dear Henry and Will,

I am responding to several emails received from both of you over the past month since meeting you on the 9th of April. I apologise for the slight delay in responding – as you are aware, Mrs Sadler has been in hospital with pneumonia.

I hope I have covered all the points below:

My fees

Thank you for confirming my fees at £200 plus VAT. I will not agree to a cap but will notify you when I reach £3,000 plus VAT and provide the timesheets to support the claim. There is a great deal to consider as the proposals will be severing the farm, Business Park and 3 family homes. There will also be extensive discussions with St John's College in terms of the rented land and the fees for these separate discussions and negotiations will need to be paid for by your client.

Transport Planner

You and I are not transport planners, therefore the need for an expert to provide technical advice is essential. Given the undulating nature of the land, it is important the landowner is, for example, satisfied with the visibility splays in each direction on all crossing points. Whilst it is a dual busway, presumably there will be cyclists and pedestrians using the route in either direction? We will need assurances the crossings are constructed to an adequate standard in terms of weight loads and wide enough for agricultural machines.

The crossing points will be used on a regular basis by smaller (sit on) lawn mowers, pedestrians, motor vehicles and heavy plant and machinery including heavy rubber tracked machines and I shall assume all crossing points will comply with statutory disability access. I believe there is an ongoing court case with the local authority concerning a death on a local busway and I'm sure you will agree, we need to ensure the route is safe for all to use and that that includes the crossings.

Effectively, any detailed drawings and specification will need to be signed off by our transport planner and this will include reviewing any safety and disability audits. Your client is to be responsible for these reasonable costs. Please confirm.

Clients' fees

I've always worked on the basis that approximately 1/3 of my hourly rate is a fair and reasonable sum for the client's hourly rate. £30.00 per hour is extremely low. Perhaps you would reconsider this please or let me know who else has agreed to this amount?

Greenways

I'm not that close to the Greenways proposals and await to hear from Will in due course. As you say, this is a separate work stream.

Minutes from meeting

As marked on the plan attached (Field A), the landowner will require two passing points please on either side of the field (plan for identification purposes only). The farm machinery travels over headlands avoiding soil compaction and loss of crop within the middle of the field and importantly enables the landowner to continue to farm the land and access the main farmstead/business Park and his place of residence in a convenient and efficient manner. As discussed, on a daily basis the landowner will continue to use these routes throughout construction and long after the busway is operational with heavy farm machinery. These passing points are non-negotiable, and I was surprised this was not covered in the minutes as I raised the point with you twice.

Field B on the plan is owned by St Johns College. Based on two passing points (either side of field A) I suggest a single passing point on the far side of this field. I have used a dotted line for this subject to further discussions and negotiations with the College.

Field C will require a passing point constructed alongside the footpath (running north to south). We welcome further discussions on how this could work in practice moving heavy machinery in and out of the field and across the busway. This is an example of where we would want to take advice from our transport planner to ensure adequate turning circles, visibility splays and specification is appropriate noting there will be buses, cyclists and pedestrians using the busway in either direction and heavy farm machinery, cyclists and pedestrians using the footpath and crossing point.

Drainage

At present we cannot locate the drainage plans and we will continue to look for these. However, we would be happy to walk the land with you to point out the drains. A new comprehensive drainage scheme will need to be designed and approved by the landowners including St John's College and Wallis as their land drains on to my client's land. Perhaps you could arrange a meeting for all landowners to discuss this point please?

We reserve the right to appoint a drainage consultant to ensure the specification is acceptable and no less effective than the current drainage arrangements. It would also be helpful to understand from your client where the water from the busway will drain as the current systems (running through Coton) are at full capacity and the Parish Council has expressed concerns with drainage and flooding issues in the village. There is also a capacity issue with the main drain (ditch) running north to south between fields A and B. My client owns this ditch. The volume of water during a wet period or flash flood from the busway could lead to parts of Coton flooding. It will be helpful to receive your client's calculations and methodology on this particular point. Please note any additional fees relating to a drainage consultant will be your client's responsibility to pay. Please confirm.

Visuals

It was suggested your client could provide photographic visuals of what the busway will look like once completed from various fixed viewpoints. This will explain and inform the landscaping options available including fencing and tree planting. Shall I provide the viewpoints? Please confirm.

Security

It is well documented in the media that joy riding, illegal behaviour and trespassing is a regular occurrence along many busways. What assurances and practical measures can your client give that there will not be any issues on this stretch of the busway?

Family Burial site.

Your client has been made aware that the ashes and final resting place of the landowners' parents are buried (not scattered) within proximity of the proposed route. As requested, the W3W location is... *Violin. Veal. Stuck*. The exact location will need to be verified and the W3W reference has been provided as a guide.

Understandably my client is anxious and deeply stressed about the busway passing over or anywhere close to the resting place. The location is a special place and the ashes of Mr F and Mrs E Sadler were laid to rest by the local vicar who carried out a religious service at the time. The location will also be the final resting place of the ashes for the landowner and his wife.

I am concerned to hear that various conversations and meetings have taken place over the years between your client and the landowner regarding the sensitive subject of digging up and relocating the ashes and many of these meetings may have occurred without my client having any proper professional support or guardianship at the meetings. Please can you request from your client all minutes and notes from all meetings and calls that have taken place regarding this sensitive issue.

May I remind you that Mr and Mrs Sadler are elderly and in poor health. Mr and Mrs Sadler are in touch with the Church who are in full support of leaving the ashes where they are. The landowner respectfully requests that the burial site of the ashes and a 50-meter radius (on land owned by my client) always remains untouched.

This issue needs to be handled delicately and with the upmost respect. I have every confidence that proper procedures have been followed by your client and that you will be able to provide sufficient evidence confirming your client has acted appropriately and with compassion regarding these meetings.

The press has been in touch to investigate the story, but my client does not want further adverse publicity that could lead to further stress and until now has refused to talk to the media regarding the C2C busway.

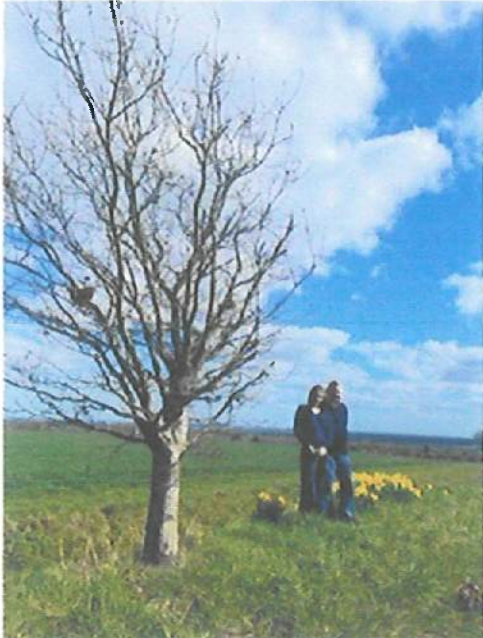
I have attached below a photo of the location and suggest your client has 21 days to provide all the requested documentation on this most sensitive of issues.

Turning to Will's last email, I can't say I agree that there has been 'full engagement and discussions with landowners along the A1303'. For example, for over 22 years, I have personally owned land (freehold) stretching 100m adjacent

to the A1303 opposite Madingley wood and at no one has anyone contacted me regarding any proposals. I'd be happy to provide a land registry plan so your client can check their records and to move this forward, could you please ask your client to provide the evidence of the 'significant physical constraints' referred too along the A1303 from the Madingley Mulch roundabout beyond Junc. 13 of the M11. A landownership plan and the workings of a proposed route detailing inadequate space will be sufficient to explain the constraints you have highlighted.

I look forward to hearing from you soon with answers and information as requested.

Regards
Rob Sadler
07968 550458



**Picture of the burial site of Mr F and Mrs E Sadler.
John Sadler and granddaughter Holly pictured.**

Appendix E: Email from CBRE to Rob Sadler dated 12 July 2024

1. Acknowledges that the What3Words reference was indicative only.
2. Confirms need for site visit to verify burial location.

Rob Sadler

From: Gullett, Will @ London <Will.Gullett@cbre.com>
Sent: 12 July 2024 17:36
To: Rob Sadler
Cc: Church, Henry @ London HH
Subject: RE: C2C - Sadler family burial site.

Good afternoon Rob,

We note and appreciate the W3W locations were provided for guidance purposes. In order to be entirely accurate, we would ideally receive confirmation of the exact location of the burial sites ahead of the process of mapping out the route. As an alternative, and as a minimum, we would need you or a family member to identify the location to the survey team on arrival. This will enable the team to provide the assurances your clients are seeking. You and/or your client would be more than welcome to be present during the mapping process and would no doubt provide valuable insight to the team.

My client appreciates the early sight of the CGI which has been produced. They have raised concerns about the accuracies of the image and would refer you to the plans already produced to support the application if you required further factually based material.

Many thanks

Will

Will Gullett MRICS FAAV
Senior Surveyor
CBRE | Valuation & Advisory Services
Henrietta House | Henrietta Place | London W1G 0NB
M +44 (0)7881 006123
will.gullett@cbre.com | [LinkedIn](#)

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From: Rob Sadler <rsadler@mandsestates.com>
Sent: Friday, July 12, 2024 10:19 AM
To: Gullett, Will @ London <Will.Gullett@cbre.com>
Cc: Church, Henry @ London HH <Henry.Church@cbre.com>
Subject: RE: C2C - Sadler family burial site.

External

Dear Will/Henry,
Many thanks for your email. Comments below.

From: Gullett, Will @ London <Will.Gullett@cbre.com>
Sent: Friday, July 12, 2024 9:42 AM
To: Rob Sadler <rsadler@mandsestates.com>
Cc: Church, Henry @ London HH <Henry.Church@cbre.com>
Subject: RE: C2C - Sadler family burial site.

Dear Rob,

Thank you for your email.

I have spoken with GCP and would suggest the following.

The busway's final alignment is subject to detailed design, and, of course, contingent on consent being granted by the Secretary of State. Such a consent would be for works within the red line boundary for the scheme which, as we indicated in my email on June 11, would not impact either of the w3w locations your family has provided, both of which are marked on the attached plan. **As expressly stated, the W3W locations provided are for guidance purposes only. They are not to be relied upon. Hence the reason for the route to be accurately marked out.**

We suggest the best approach would be to visit the site to get an agreed accurate location for the burial site with you/your family. On the same visit we can mark out the scheme relative to the location of burial site. Following this visit we will then provide your family with a more detailed plan, based on our current proposals, also showing the precise position of the ashes and scheme elements. We can then look to provide a formal assurance to your family that the busway will not be going through your grandparents resting area. My client and their team are confirming availability of a surveying team and we will be in touch with regards to agreeing a date. In the meantime, please let me know if there are any particular good or bad days/weeks for you and your client. **I look forward to receiving at least 2 alternative dates from you for the on site measurement to plot the busway, landscaping belts and cycle way and we will ensure to accommodate the meeting. The landowner to be present at all times during the marking out of the route.**

We note your comment regarding contact between the GCP and your client, if it would assist we are happy to share the correspondence and minutes from the previous meetings to ensure you have all the information you require. I would hope that will clarify the statement within the local news article. **As your client was unwilling to address this request made in my email to you 14th May and in light of the comments reported in the Cambridge Independent news article published 3rd July by the GCP, your client will be fully aware that a formal freedom of information request was made to the GCP 10th July (2 days ago) requesting information from all known associates and sub-contractors concerning all correspondence and material in connection with the C2C busway specifically relating to land and buildings at Crome Lea Farm (farm or House) or any information relating to the Sadler family. I trust the GCP will respond to this within the statutory period and provide all information.**

With regards to the CGI produced, I just wanted to clarify that my email dated 11 June with our thoughts behind instructing a transport planner is still applicable. My client will not cover the costs arising from that, or similar, instruction and I have been asked to reiterate that to you. Should you require specific details on the scheme then GCP will be happy to provide these based on the current design and not a 3rd party interpretation thereof. **Your comments are noted. The purpose of sending you this first CGI was for your client to comment on the image before it goes public later today.**

I look forward to hearing from you. **I look forward to hearing from you with the dates.**

Many thanks

Rob

Kind regards

Will

Will Gullett MRICS FAAV
Senior Surveyor
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From: Rob Sadler <rsadler@mandsestates.com>
Sent: Wednesday, July 10, 2024 8:22 AM
To: Gullett, Will @ London <Will.Gullett@cbre.com>
Subject: RE: C2C - Sadler family burial site.

External

Dear Will,

Further to my email a week ago, I'd be grateful if you could let me have some dates as soon as possible please for the site measurement. As I'm sure your client will appreciate, this is causing a great deal of stress to my client and the words quoted by your client in the recent news article need to be fulfilled... for the record, there is no evidence to support the GCP talking to my client now or in the past.

'we understand this is a difficult situation for the Sadler family and we have been talking to them about this matter for some time'and 'we continue to talk to the family'

To assist with the process, I have commissioned a firm of architects and transport planners to prepare a CGI of the bus route based on the information you have previously provided. This sets out the full working width of the busway that will need to be plotted on the ground. You'll recall when we last met that we discussed preparing several CGI's of the scheme from key positions along the route.

I look forward to hearing from you soon in respect of a date and time to carry out the on-site measurement.

Regards
Rob Sadler

From: Rob Sadler <rsadler@mandsestates.com>
Sent: Wednesday, July 3, 2024 8:35 AM
To: Gullett, Will @ London <Will.Gullett@cbre.com>
Subject: C2C - Sadler family burial site.

Dear Will,

Could you please arrange for the GCP and their consultants to accurately mark out along the ditch line close to the burial site the full development width of the busway marking out the following with wooden stakes with colour coded tops as follows:

7.3 m busway - black
Min 3 m cycle route - brown

Central swale believed to be 5 m - yellow

Landscape buffer strips either side- red. The southern buffer strip appears wider to account for the second swale.

The landowner to be present at all times during the process and I suggest a representative from the GCP is also present.

Given the recent press story in the Cambridge Independent, I'm sure the GCP will want to move at pace . I look forward to hearing from you with 2 suitable (alternative) dates.

Regards

Rob Sadler

Rob Sadler

07968 550 458

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Appendix F: Letter from Mr Jo Baker (GCP) dated 6 August 2024

1. Reiterates claim that the burial site is not “under the busway (track)”.
2. Dismisses impact of landscaping and maintenance corridor as not part of the “busway”.

Date: Tuesday 6 Aug
Contact: Jo Baker
Email: contactus@greatercambridge.org.uk

PO Box 1493
4 Regent Street
Cambridge
CB1 0YR

Cambourne to Cambridge

Dear Mr Sadler,

Thank you for your email dated 29 July 2024 which I respond to you within this letter.

On 27 January 2020, your family provided details of the burial site at a location well to the north of the route. This was helpful to inform the design and established the stated position of your family was they wished to relocate the ashes. This was reiterated by your brother, Stuart Sadler on 26 May 2021. On 9 April 2024 you provided further details of the location of the burial site which was closer to the route. On the recent site visit (26 July 2024), you identified a third location, much closer to the line of the route as the location of the burial site. Providing the last location you have provided is correct, the GCP are keen to work with you and your family to come to an agreement to mitigate concerns, where reasonably possible.

It is appreciated you would ideally like 50m buffer between the scheme and the burial site, but having been through four rounds of consultation and early meetings with your family, such a buffer had never been suggested previously and therefore has not been included in designs. During those meetings the suggestion was the family preferred to relocate the caskets. As we are sure you can understand, the early consultations are extremely important to inform the scheme designs and parameters; unfortunately, the changes you are suggesting would be difficult to implement at this stage and a 50m buffer is not something that can be offered. However, as mentioned earlier, we would hope to reach a satisfactory agreement with your family to mitigate the situation where possible.

Re the CPO comment, ultimately the decision as to whether a Transport and Works Act Order should be made resides with the Planning Inspectorate and, should that be successful, the powers would exist to acquire the land and relocate any human remains should that be required. I can only reiterate that we always hope to avoid using such powers.

You have questioned why the GCP stated in the Cambridge Independent press article that 'the proposed route for the busway and active travel link avoids the burial site'

The initial reports in the Cambridge Independent gave the impression that the ashes would be under the busway. With the location your family had provided then and using the most recent location you have indicated, the ashes will still not be under the busway track. To be clear, the landscaping either side of the busway, is not the actual busway.

During the site visit you discussed the need for an additional crossing point with Will Gullett and Tony Taylorson

This conversation was noted, and the issue of the crossing point is being reviewed.

You have expressed concern that the importance of a crossing at this point has been discussed many times before.

A number of factors have been considered regarding the crossing including operational safety and ecological mitigation but the site visit was invaluable in hearing from you and seeing the challenges you outlined so this is being reviewed further.

You asked the team to visit Madingley Road with you to view the boundary of the SSSI. The development of the route has been the subject of four rounds of public consultation and extensive review including an independent audit which has confirmed the selection of the current preferred route as well as Environmental Impact Assessment. The GCP, over seven years ago, made your family, as a local landowner, aware of the work being undertaken, and your views on the scheme during the subsequent consultation rounds have been very welcome. Whilst you are at liberty to make representations on these matters at the public inquiry, the issues you raise have been extensively documented and the relevant assessments can be found on our website.

You have requested detailed drawings to illustrate that the busway would not fit along Madingley Road and suggested no one from the GCP has ever discussed any alternative options with the family along Madingley Road.

The GCP has recorded engagement directly with you as far back as 2017 when details of the early option assessments were shared, and again in 2020, as well as the four rounds of consultation.

You also make suggestions with regards to Cambridge Road, Madingley. Multiple options to the north and south of the A428/A1303 and on-road have been assessed in line with government guidance, including options suggested by Coton Parish Council, CPPF and other local stakeholders. A preferred route for the scheme was then selected and subjected to an independent audit.

Overall, and as mentioned above, extensive option assessment has been undertaken in line with government guidance and was subject to reviews both by ARUP and Jacobs on behalf of the previous Mayor, and an independent audit.

Finally, you asked for confirmation on specific points from the GCP:

- 1. The burial ground is 6-7m within the total width of the busway.*

On the basis we have been provided three locations for the burial ground, we are hoping that the location confirmed at our last site visit is the correct location and that there is no other location, but please do confirm. To be clear, none of the three locations which have been suggested are within the proposed busway track.

- 2. The GCP will provide a suitable additional passing point as detailed above.*

The GCP is reviewing crossing point locations and will prepare some draft plans for discussion.

- 3. Provide detailed drawings of the busway with the additional passing point 50m away from the burial site.*

As above, we are unable to agree to a 50m buffer, but providing the location of the burial site is correct we will look to keep as far away as we possibly can. Please note in light of the meeting with the Sadler family in 2020 and subsequent 2021 site visit, the presumption has been that the ashes will be relocated by the family.

- 4. Confirm whether the GCP will be prepared to impose CPO and override the wishes of*

the family and the church to acquire land near to or over the burial site.

Should a Transport and Works Act Order be granted and no satisfactory agreement be reached, and its confirmed the ashes are located within the red line boundary, the GCP would relocate them if that was the preference of the family. On the basis the location most recently provided is correct, the GCP will seek to remove the location from within the red line boundary. If no satisfactory agreement can be reached and the removal of the ashes is deemed to be necessary then the GCP would have the powers to move under the TWAOC/CPO powers; but currently does not anticipate the need to do so and would always seek agreement without use of CPO powers.

5. Provide a tree survey to include the verge and fence line within Madingley Wood

A full assessment of off and on-road options has been published on our website and been the subject of four public consultations.

6. Provide the detailed drawings illustrating that any considered on-road busway option would take substantial land on the south side of the road opposite Madingley Wood.

A full assessment of off and on-road options has been published on our website and been the subject of four public consultations.

I hope that this letter responds to some of your concerns. We will review the details of the scheme in the area visited and come back to you when we have done so.

Regards,

Jo Baker

Project manager

Appendix G: News Article from the Cambridge Independent.

1. Quote from the Applicant that the busway avoids the burial site.

Holly, John, Rob and Wendy Sadler at the family burial site on their farm in Coton
Picture: Keith Hepost



'C2C busway route could force us to move our parents' graves'

By Alex Spencer

alex.spencer@liffemedia.co.uk

A farmer fears the Greater Cambridge Partnership will destroy the site of his parents' grave in a field that is on the line of a proposed busway.

John Sadler, 77, whose family have run a farm in Coton for four generations, explains that urns containing the ashes of father Frank and mother Eileen are buried in farmland on top of a hill that overlooks the village.

The viewpoint is marked by a memorial bench and flowers and is passed by family members "up to 30 times a day" because it is next to a footpath that connects his home with those of his two sons, Robert and Stuart.

But the GCP plans to build the off-road Cambourne to Cambridge busway through the field and a map seen by the family appears to show the route plunging through the burial area.

The GCP denied yesterday (Tuesday) that the busway would cross the burial site but the family remains unconvinced, saying they have had no written confirmation of this despite years of trying to get clarity, have not seen a detailed plan showing the route bypassing the burial site, and no one from the GCP has been to stake out the route.

Frank, who lives at Littlefield Barn in Coton, explained: "My father chose this place to be buried because he loved this land and from here he could

see his farm, the village and all his neighbours - he said he wanted to keep an eye on them. He was buried here in 1990 and my mother Eileen's ashes were buried with him in 1991.

"We had a blessing here by the vicar after the ashes were interred and ever since it has been a special place for our family - my sons and grandchildren - with a bench here so we can enjoy the view that my dad loved, and flowers to mark the burial.

"Now I am absolutely horrified that this could be destroyed by the busway cutting through our field.

"From what we understand by looking at the maps, the route will cut through the burial site - meaning the urns will have to be dug up.

"And even if it ends up being a couple of metres away from the grave it still completely destroys the place where we remember my parents and then perhaps we will be forced to move them anyway."

John's wife, Wendy, said: "We have never had a clear answer about what is happening with the burial site. It's just been swept under the carpet."

The family has asked for advice from the church and has been told that ashes cannot be dug up without a formal consent from the Ministry of Justice, and for an application to be approved.

John's son, Rob Sadler, said: "We think it's likely that the ashes are within the line of the busway. It's difficult to be 100 per cent sure as we have no dimensions provided by the GCP. However, we know the busway is a dead straight line and we know

where it starts and crosses a point further down.

"And we know that including the busway, cycle path and earthworks and landscaping will be between 35 and 40 metres wide, so using those facts we think it crosses the burial site.

"I think a very helpful next step would be if the GCP could mark out the route on site and show us where the edge of the busway and all the other works associated with it will go."

John says: "We want to fight this. It's absolutely not right to move my parents' remains."

The family is also concerned that the busway would cut across the footpath between the three family homes and that the new access point being suggested by the GCP is much further away.

Wendy says, "I am disabled and if the access is moved it will make it almost impossible for me to visit my grandchildren in the houses across the field."

The Cambourne to Cambridge busway plan would see a dedicated off-road route cut through Coton Orchard and Green Belt land to provide a new transport link to the city.

The busway would serve Cambourne and the proposed Bourn Airfield development, as well as Hardwick, Coton and the West Cambridge campus. It would also feature an 'active travel path' alongside it for pedestrians, cyclists and equestrians. A new Park & Ride

site is also proposed under the plans.

The route, originally priced at £220million but which may now cost considerably more, has faced enormous opposition, with particular concern raised over the plans to plough through Coton Orchard, which would mean felling about 500 veteran trees.

Conservation charity Cambridge Past, Present and Future (CPPF) commissioned a report which argued that there are other on-road solutions that would deliver similar transport and economic benefits.

The report said this could be achieved quickly, at significantly less cost, with less impact on the environment, green belt and local communities.

But councillors voted down the motion to consider CPPF's alternative after hearing on-road options had been examined by the GCP.

A GCP spokesperson said: "We understand this is a difficult situation for the Sadler family and we have been talking to them about this matter for some time.

"The proposed route for the busway and active travel link avoids the burial site, but we understand the family's concerns about the scheme travelling through an area that is important to them. We continue to talk to the family about this.

"The Cambourne to Cambridge scheme - which has been subject to detailed public consultation - would need to be approved by the Secretary of State for Transport."

Council takes GCP to court over greenway



Cllr Josh Newman with Emma Goddard in Grantchester

A parish council is set to take the Greater Cambridge Partnership to judicial review over a decision to build a greenway cycle path through the centre of their village in spite of residents' opposition.

The decision to send the cycle route through the village was made by the GCP in January despite a survey finding that 75 per cent of respondents in Grantchester opposed the plan and preferred an alternative route that avoided the village centre.

Now, after raising funds for legal advice, the parish council has informed the GCP of its intention to seek judicial review.

Cllr Josh Newman, vice chair of Grantchester Parish Council confirmed: "We have applied for judicial review and that process is ongoing".

The parish council has previously claimed it was given assurances by a councillor - who at the time was a member of the GCP executive board - that if the village was against the route, it would not be opposed by them.

However, a wider GCP consultation that included people outside Grantchester found most of those respondents were in favour of the village route and the GCP determined it should therefore go ahead.

At a meeting in January this year, the GCP executive board supported proposals for the Haslingfield Greenway project, which aims to create a "sustainable travel corridor" between Haslingfield and Cambridge for cycling and walking.

Thomas Fitzpatrick, head of GCP programme, said at that meeting: "The route through Grantchester would provide the most direct connection between Haslingfield, Grantchester and Cambridge, and would also allow the M11 bridge to become step-free, therefore greatly improving accessibility for all users."

The route is one of the 12 greenways from the GCP, which aim to enable those around Cambridge to travel into the city without using a car.

A GCP spokesperson said: "The GCP has followed due process in developing the Haslingfield Greenway and will engage in any necessary judicial process."

Appendix H: Letter from the Applicant dated 25 September 2024

1. Admits that an earlier Heads of Terms document was mistakenly issued to an unrelated third party.
2. Denies that a GDPR breach occurred.

Date: Wednesday 25 September
Contact: Mr Rob Sadler
Email: hello@cambridgeshire.gov.uk

PO Box 1493
4 Regent Street
Cambridge
CB1 0YR

Dear Mr Sadler

Thank you for your letter, I will seek to address the points you make in turn.

Prior Engagement

With regards to the suggestion that the GCP or their consultants had not contacted you regarding your ownership in connection with the busway options; I can confirm we do have records of written correspondence between you and the then GCP Project Manager, going back to March 2017 when we were considering on and off-road options. In addition, all affected properties would have received direct mailings about the various consultations which have taken place while the scheme was developed.

The option development for the busway has been ongoing since 2014 and has been subject to various audits and reviews as well as four rounds of consultation. This was narrowed down to the scheme options to the final business case, which will be submitted as part of the TWAO application proposed in October 2024.

Proximity to Route of Burial Site

We appreciate from the perspective of the family, the full width of land which may be acquired is a concern. As we have previously explained not all the land within the red line boundary will be built upon. If the preference of your family is now that the caskets remain in-situ we will ensure that they are not built upon.

We understand this is a sensitive matter and have certainly approached it in such a manner. If you feel this has not been the case, then we are sorry. I can confirm we met with members of the Sadler family in 2020 and twice in 2024. On each occasion different details of the location of the burial site were provided.

We met with your family on 27 January 2020 and were told that the burial site was at:
<https://w3w.co/shots.foam.hurry>.

This is outside the red line boundary for our proposed route which will be submitted as part of the TWAO and which was discussed on site when we met in July 2024. In 2020, we were told specifically that "It would be our intention to move the ashes regardless of whether the bus lane goes directly over or even nearby as the chosen spot was selected for its peace and tranquility and not because 20 buses an hour will be passing it".

Again, both now and at the time, we understand that this was a difficult process and it was not action that your family would have preferred to take. The statement provided by your family was taken in good faith and as such, whilst we regret that we cannot comply with your more recent request, we believe our position, reflects the information that was provided.

We note that you now take issue with the suggestion that in previous *"meetings the suggestion was the family preferred to relocate the caskets"* and infer that the GCP and their consultants *"took advantage of this and showed little respect for the sensitive nature of the situation"*. At the 2020 meeting, Mr Stuart Sadler was present and active whilst the family expressed their views. On 26 May 2021, Mr Baker met with Mr Stuart Sadler on site and the same position was reiterated by him, unprompted.

Crossing Points

It was a very helpful meeting with yourself in July this year to hear and see directly from you the challenges which the proposed passing point would have created. We are now preparing a revised layout showing an alternative

crossing proposal for your consideration. CBRE will be in contact with you shortly to discuss this further.

Property Agreements

We cannot comment on commercial terms which we are negotiating with any other landowners. However, in line with government guidance and of course good practice, we will always seek to reach agreement with landowners in advance of the Transport and Works Act submission. However, we will always have the fallback to acquire land through CPO powers if an agreement cannot be achieved. That position applies to everyone, not just the colleges or the University.

Incorrect Issue of Heads of Terms

With regards to the Heads of Terms, we understand that an incorrectly file named draft set of Heads of Terms was issued by our agents CBRE by mistake. This was regrettable and we will address the matter with CBRE. We take such breaches seriously and can only apologise. We have undertaken a review of the matter and whilst we recognise that this was a mistake, we do not believe that a GDPR breach occurred on the basis given that the only data shared was:

- the name and address of Mr and Mrs Sadler which is well known to the recipient; and
- the suggested value of Crome Lea Farm plots based on the area defined in maps which are publicly available and a standard rate per hectare.

Minutes of Meetings

Minutes can be provided of the meetings in 2020 and 2024. These will be attached to the email sending you this correspondence. The site visits in 2021 and 2024 were not minuted.

Madingley Wood SSSI

With regards to the land between the highway and Madingley Road, we have undertaken extensive option development. We have not undertaken a tree survey for Madingley Wood SSSI because it is fully documented in its citation¹ as an SSSI.

The importance of this strip of land is set out by Natural England² who state that "the strip of land between the existing road corridor and the SSSI provides an important habitat buffer which protects the SSSI from adverse effects associated with the road corridor including traffic emissions, contamination, noise, lighting and access".

Comberton Greenway

The Greenway team will respond with regards to surveys for the Comberton Greenway.

I hope that this responds to the issues raised and would be happy to discuss further.

Yours sincerely,
Jo Baker
Project Manager
Greater Cambridge Partnership

¹ [Wood \(naturalengland.org.uk\)](https://www.naturalengland.org.uk)

² [220118-Natural-England \(greatercambridge.org.uk\)](https://www.naturalengland.org.uk)

Appendix I: Extract from Mistakenly Disclosed Draft Heads of Terms

1. Refers to Sadler land and includes tracked changes copied from St John's College negotiations.

2. Illustrates mishandling of personal and confidential data.

Heads of Terms

HEADS OF TERMS FOR AN AGREEMENT BETWEEN JOHN & WENDY SADLER ("LANDOWNER") AND CAMBRIDGESHIRE COUNTY COUNCIL ("CCC")

Overview/Preamble

CCC is promoting the construction of the Cambourne to Cambridge Guided Busway ("CtoC").

To facilitate land assembly for CtoC, CCC is promoting a Transport & Works Act Order ("the CtoC TWAO") to acquire all the land interests and rights required to construct CtoC.

CCC wishes to enter into agreements to acquire the identified required interests by agreement without implementing TWAO powers.

John & Wendy Sadler have land interests affected by the scheme ("Affected Land Interests") as follows:

1. Land to the south of St Neots Road – Crome Lea Farm (Freehold)
2. Land on the north-west side of the Whitwell Way, Coton (LeaseholdFreehold)

The land interests are held under title CB222862, detailed on the attached plan ("the Affected Land Interest Plans") and included within the TWAO.

Option Agreement

John and Wendy Sadler and CCC ("the Parties") agree to enter into an agreement binding;

- John and Wendy Sadler (to include its successors in title) to meet obligations ("the Landowner Obligations") and the joint obligations ("the Joint Obligations")
- CCC (to include its successors in title) to meet its obligations (the CCC Obligations) and the Joint Obligations

The term of the option agreement will commence on the date at which the TWAO is confirmed and terminate of three years after the date at which the CtoC order has been confirmed and is free from challenge.

Landowner Obligations

John and Wendy Sadler agrees;

1. To transfer the unencumbered Affected Land Interest coloured pink on the attached plan to CCC, conditional upon:
 - Confirmation of the CtoC TWAO
 - And
 - Service of three months' notice by CCC

The consideration to be either

Heads of Terms

- 7.013 Acres @ £11,000 / acre equating to £77,144.80 this being my assessment of the value of the land interest acquired on a no-scheme world basis, or
 - A minimum payment of 90% of my assessment of value together with the right to refer the quantum of compensation for assessment.
2. If the land is tenanted, to advise CCC of the nature of occupation and a copy of the agreement. To secure the necessary co-operation and input from the tenant to facilitate the agreement envisaged in these Heads of Terms.
3. To enter into an option with CCC for a licence allowing CCC and its appointed agents and contractors to occupy the Affected Land Interest coloured green on the attached plan:
- a. For a period of two years from the date when required for commencement of road construction activities for the purposes of using it as a works compound and an essential area to carry out works of construction for the CtoC scheme,
 - b. the consideration to be:
 - i. If directly farmed, a licence fee calculated by way of multiplying 1.55 acres by the appropriate crop margin for each affected growing season.
 - ii. If tenanted, the proportion of rent forgone for the licence period.
 - c. If at the end of the licence term, CCC's contractor reasonably requires continued use of the licence area, the licence period can be extended by a further six months but only on two occasions, i.e. two further 6-month periods.
 - d. CCC is to reinstate land in accordance with a specification to be agreed between the parties.
- 4.3. On documenting the agreement envisaged by these Heads of Terms:
- a. not to submit any objection to the CtoC TWAO (or any reasonably modification of the CtoC TWAO) or to make adverse representations in respect of any planning matter related, directly or indirectly, to the scheme being promoted by CCC, or support others in doing so.
 - b. Not to create any new subsidiary interests concerning the Affected Land Interest.
 - c. To accept the provision of the accommodation works shown on the attached schedule ("the Accommodation Works Schedule"). Such works may include granting of rights to the landowner
 - d. To mitigate its losses.

CCC Obligations

CCC agrees

- 5.4. To take a transfer of the Affected Land Interest and enter into the options for licence.

Heads of Terms

6.5. To provide the accommodation works shown on the attached schedule ("the Accommodation Works Schedule")

7.6. To provide a right of access to John and Wendy Sadler and ~~their~~ its authorised tenants and agents ~~along across~~ the busway route to John and Wendy Sadler retained landholdings at the designated "private means of access" crossing points ~~coloured purple on the attached plan~~ shown on the plan for agricultural use only.

8. ~~(future access provisions to be added here.)~~

9.7. To pay consideration either in

- a. Full and final settlement; or
- b. as an Advance Payment in respect of the Affected Land Interest and severance and injurious affection reserving, to the landowner, the right to recover additional compensation in respect of both the land interest acquired and the severance and injurious affection together with a further sum in respect of disturbance, all sums to be assessed in accordance with the compensation code. The Advance Payment to be the minimum consideration payable.

10.8. Where consideration/compensation is to be assessed it shall be assessed

- a. Having regard to the works provided in accordance with the Accommodation Works Schedule
- b. in accordance with the Compensation Code (being the various Acts of Parliament, Statutory Instruments and decided case law used to assess compulsory purchase compensation)
- c. at the Valuation Date which shall be the date of the transfer of the Affected Land Interest

11.9. If, after the land transfer the CtoC TWAO is not implemented the Council will apply the Criche! Downs rules and as appropriate offer back to John and Wendy Sadler the land acquired on terms at market value, the price to be fixed at the date of the transaction.

12.10. In the event of a dispute then the matter to be referred to an arbitrator to be appointed by agreement between the parties or in the absence of this, by the President of the RICS whose decision shall be final, save where the matter relates to compensation when the dispute shall be referred, by agreement, to the Upper Tribunal (Lands Chamber).

13.11. That it will not implement the CtoC TWAO in respect of the acquisition of any land or land interests owned by John and Wendy Sadler unless they are either unable or unwilling to comply with the terms of the agreement envisaged by these Heads of Terms.

Joint Obligations

14.12. The parties agree to act reasonably and in good faith

Commented [GW@L1]: What plan are we using to illustrate this?

Commented [OB@LH2R1]: For now, the general arrangement plan. I don't think this will be sufficient for the final legal agreement but we are not in the place of locking this down as yet. The GA plan will suffice so far as HoT's

Heads of Terms

~~15.13.~~ To respond to communications from each party in reasonable period of time and to use reasonable endeavours not to cause unnecessary delay to the timing and programming of the CtoC TWAO and scheme delivery.

Costs

~~16.14.~~ CCC agrees to meet John and Wendy Sadler's reasonable surveyors costs reasonably incurred in connection with the agreement anticipated by these Heads of Terms, on completion of the agreement.

~~17.15.~~ CCC agrees to meet John and Wendy Sadler's reasonable Legal costs reasonably incurred in connection with agreement and subsequent transfers anticipated by these Heads of Terms such costs to be agreed between solicitors both parties acting reasonably.

Contract Terms

~~18.16.~~ Subject to

- a. Contract
- b. CCC approval
- c. Landowner approval

CPO Acquisition Plots & Value

	Sum of Area (Sqm)	Sum of Acres	Sum of Land Value
Crome Lea Farm (Freehold)			
Plot 11-121 - Powers to Acquire Land	19,529.45	4.825814	£53,083.95
Plot 12-125 Powers to Acquire Land	8,851.928	2.18735	£24,060.85
Total	28,381.378	7.013164	£77,144.80

Accommodation Works

Specific requirements to be discussed.

DRAFT

Appendix J: Second (Final) Heads of Terms Issued to the Sadler Family

1. Issued only two weeks before TWAO submission, without prior consultation or revision.
2. Far more detailed than earlier version, inconsistent with accepted practice.

Heads of Terms

HEADS OF TERMS FOR AN AGREEMENT BETWEEN JOHN & WENDY SADLER ("JWS") AND CAMBRIDGESHIRE COUNTY COUNCIL ("CCC")

Overview/Preamble

CCC is promoting the construction of the Cambourne to Cambridge Guided Busway ("CtoC").

To facilitate land assembly for CtoC, CCC is promoting a Transport & Works Act Order ("the CtoC TWAO") to acquire all the land interests and rights required to construct CtoC.

CCC wishes to enter into agreements to acquire the identified required interests by agreement without implementing TWAO powers.

JWS has land interests affected by the scheme ("Affected Land Interests") as follows:

1. Two parcels of Freehold Land held under one title and forming part of Crome Lea Farm Madingley Road Coton, Cambridge CB23 7PH. Title number CB222862 ("The Freehold Land"). The land parcels are identified as follows:
 - 1.1. Western Parcel being situated south of St Neots Road and Crome Lea Farm and Business Park
 - 1.2. Eastern Parcel being situated south of St Neots Road and the American Cemetery.
2. Tenanted Land, land on the north-west side of the Whitwell Way, Coton, Title Number CB357469, occupied under an AHA agreement from St Johns College ("The Tenanted Land")

The land interests are detailed on the attached plan ("The HoT's Plans") and included within the TWAO as per the plot schedule appended to these Heads of terms.

Option Agreement Summary

JWS and CCC ("the Parties") agree to enter into an option agreement binding;

- JWS (to include its successors in title) to meet obligations ("the JWS Obligations") and the joint obligations ("the Joint Obligations")
- and
- CCC (to include its successors in title) to meet its obligations (the CCC Obligations) and the Joint Obligations

Upon triggering of the option, CCC will pay either

1. A full and final compensation settlement (if agreed),
- or
2. 90% of its assessment of compensation on a compensation code basis.

CCC and its contractors will occupy the affected land interests under licence to construct and operate the busway.

When the final land acquisition boundaries are ascertained the freehold of the required land interests will be transferred to CCC.

CCC and JWS will negotiate the settlement of compensation arising as per the compensation code. CCC may make, within 90 days' of reasonable request of sums agreed to be due, interim compensation payments, in advance of agreement of the final compensation due.

Heads of Terms

The Parties	<p>JOHN SADLER and WENDY SADLER of Woodfield House, Madingley Road, Coton, Cambs CB3 7PH.</p> <p>and</p> <p>Cambridgeshire County Council, St. Thomas Place, Cambridgeshire Business Park, Ely, CB7 4EX</p>
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JWS Obligations

The Option – Occupation for Busway Works & Use	<p>Conditional upon:</p> <ul style="list-style-type: none"> – the CtoC TWAO being made and – Service of three months' notice by CCC and – Payment of either <p>a) A full and final consideration of £77,500 based in 7.01 acres @ £11,000 per acre, (being the Council's assessment of the value of the land interest acquired on a no-scheme world basis)</p> <p>or</p> <p>b) 90% of CCC's assessment of compensation payable on a Compensation Code basis, together with the right to negotiate the final compensation sum and if necessary refer the quantum of compensation for assessment to the Lands Chamber of the Upper Tribunal by consent of the parties.</p> <p>JWS agrees;</p> <ol style="list-style-type: none"> 1. To grant a Licence to CCC to occupy for the purpose of construction and operation of the CtoC Scheme all the Freehold Land. And 2. To provide vacant possession of Tenanted Land plot coloured pink and green on the enclosed plan. And 3. Dependent upon the terms of the AHA agreement, to grant a licence to CCC or enter into a tripartite licence with St Johns College and CCC of the Tenanted Land coloured green, for the purposes of a works compound, welfare, storage, access and other associated CtoC construction activities. (The terms of which are detailed under "Works Compound Licence Term" below)
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Heads of Terms

The Option – Transfer of Freehold	<p>Conditional upon:</p> <ul style="list-style-type: none"> - Confirmation by CCC of the final land occupation boundaries of the scheme as informed by final land boundary drawings. <p>And</p> <ul style="list-style-type: none"> - CCC Providing a land registry compliant transfer plan that aligns with the final occupation boundaries. <p>And</p> <ul style="list-style-type: none"> - Payment, if applicable, of an Interim Compensation payment. <p>JWS agrees;</p> <ol style="list-style-type: none"> 1. To transfer the Freehold Land as delineated by the final occupation boundaries.
Busway Access Protocol	<p>JWS and their tenants and appointed agents are to comply with the Busway Access Protocol (BAP) to be produced by GCP and / or the designated busway operator.</p> <p>The BAP will govern the practical matters of vehicular access across the busway, security and use of ANPR or other access control systems, prohibition of animals crossing, and liaison with the Busway Operator Control room in the event of unusual or oversize loads crossing the busway route.</p> <p>Drafting of the BAP will be undertaken at point when the operational requirements of the busway are clear.</p>
Tenants / Occupiers	<p>Where applicable JWS Agrees to procure the cooperation and contractual agreement of its tenants or licensees who occupy the Affected Land Interests and secure vacant possession in line with the three-month option notice period agreed with CCC and not to create any other land interests which affect the Affected Land without CCC's consent (NTBUWD).</p> <p>If vacant possession cannot be secured within the option timescales CCC may use TWAOW powers.</p>
TWAO	<p>On documenting the agreement envisaged by these Heads of Terms:</p> <ul style="list-style-type: none"> - Not to submit any objection to the CtoC TWAO (or any reasonably required modification of the CtoC TWAO) or to make or procure the making of adverse representations in respect of any planning matter related, directly or indirectly, to the scheme being promoted by CCC, or support others in doing so. - To withdraw within 5 Working Days any objection to the CtoC TWAO already made. - Not to create any new subsidiary interests concerning the Affected Land Interest that may fetter the ability of JWS to comply with the obligations set out in these Heads of Terms.

Heads of Terms

	<ul style="list-style-type: none"> - To accept the provision of the accommodation works shown on the attached schedule ("the Accommodation Works Schedule"). Such works may include granting of rights to JWS. - To mitigate its losses.
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CCC Obligations

Family Burial Site	<p>Discussions with the JWS Family has established that there are ashes of relatives of the JWS family buried within the Western Parcel of JWS landholdings. (The "Burial Site")</p> <p>The location of the Burial Site has been communicated by way of What-Three-Word references and an on-site survey with JWS and GCP's Geotechnical consultants who recorded a GPS location. The locations are represented on the enclosed plan.</p> <p>The current outline design to be submitted as part of the TWAO against the latest reported location suggests the location of the Burial Site to be;</p> <ul style="list-style-type: none"> - Outside of the busway infrastructure (This being the tarmacked road surface and kerbs). - Within the boundary to earthworks supporting the busway. - Within the Transport and Works Act Order Limits. <p>The current design is an outline design and reflective of the present design maturity of the project. As is common with many infrastructure projects, GCP intend to procure a Design and Build contractor ("D&B Contractor") in which the delivery contractor will later produce a detailed design to build the busway.</p> <p>CCC undertakes:</p> <ol style="list-style-type: none"> 1. To treat the matter with sensitivity and respect. 2. When appointed, to instruct its D&B Contract designers to consider if it is reasonably possible to make adjustments to the design to reduce the land required for the scheme in the immediate vicinity of the Burial Site and to mitigate the impact of the Scheme on the Burial Site. 3. To brief their works contractors (when appointed) as to the location and significance of the burial site. 4. To agree a protocol with its works contractor in respect of the conduct of works in the vicinity of the Burial Site, to share this with JWS and make reasonable adjustments if requested.
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Heads of Terms

	<p>5. To engage with JWS and fund the cost of a suitable (to be agreed) landscaping scheme / planting on the boundary between the busway and the Burial Site.</p> <p>6. In the event that, notwithstanding reasonable efforts to comply with #2 above, CCC concludes that, acting reasonably, the Burial Site needs to be relocated, to engage with the JWS family to identify the timing and method by which the Burial Location might be relocated at CCC cost.</p>
Accommodation Works	To provide the accommodation works shown on the attached schedule ("the Accommodation Works Schedule") (e.g fencing types, landscaping etc)
Drainage	<p>CCC will manage the water drainage requirements arising from construction and use of the busway within the boundaries of the land to be acquired and not discharge upon JWS retained landholdings. The CtoC scheme is designed to be self-contained in terms of drainage.</p> <p>CCC will use reasonable endeavours to consider the presence and function of existing field drainage and seek to mitigate or resolve any land drainage impacts of the busway upon JWS retained landholdings.</p> <p>Acting reasonably, if drainage impacts or reasonably potential impacts are identified then CCC will consider the appointment of an agricultural field drainage specialist with a joint duty care to JWS and CCC to provide an opinion and, if required, recommended intervention or mitigation measures.</p>
Access to retained landholdings	<p>To provide a private means of access and rights to JWS and its authorised tenants and agents to access its retained landholdings between the points marked A & B, E & F on the enclosed general arrangement plan.</p> <p>Recognising that, for the tenanted land, the landlord's consent is required to facilitate access, CCC will provide St Johns College with a private means of access and rights to JWS and its authorised tenants, including JWS, contractors and agents to access its retained landholdings between the points marked C & D on the enclosed general arrangement plan.</p>

Other Terms

Works Compound Licence Terms	Use	Works Compound licence to allow CCC and its appointed agents and contractors to temporarily occupy the Affected Land Interest coloured green for the purpose of works compounds, material
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Heads of Terms

		storage, welfare, parking, access and other associated CtoC construction purposes.
	The Term	<p>The term is to be for a period of two years from taking entry on to the relevant land.</p> <p>The licence may be terminated by the CCC at any time upon not less than one month's notice to CFH.</p> <p>If at the end of the licence term, CCC's contractor reasonably requires continued use of the licence area, the licence period can be extended by a further six months but only on two occasions. I.e. two further 6-month periods.</p>
	Compensation	The Compensation to be assessed in accordance with the compensation code.
	Schedule of Condition	CCC will produce a photographic schedule of condition and provide a copy to JWS.
	Reinstatement	CCC is to reinstate land in accordance with a specification to be agreed between CCC and the landowner and tenant acting reasonably but to a state no better than as is existing at the date of occupation (documented by Schedule of Condition if required)
Compensation	<p>Compensation for the land and rights transferred to CCC along with associated disturbance arising is to be agreed between the parties, acting reasonably;</p> <ol style="list-style-type: none"> 1. In accordance with the Compensation Code (being the various Acts of Parliament, Statutory Instruments and decided case law used to assess compulsory purchase compensation) 2. At the Valuation Date which shall be the date CCC takes possession of the Affected Land Interests following triggering of the option. 3. Having regard to all of the interests and rights granted as set out in these heads of terms. 4. Having regard to the works provided in accordance with the Accommodation Works Schedule 5. With deductions for payments already made upon trigger of the option and any subsequent payments. <p>For avoidance of doubt Compensation is to include all heads of claim permissible under the compensation code and is to include; Value of Land, Severance & Injurious Affection,</p>	

Heads of Terms

	<p>Disturbance, Statutory Loss Payments, professional fees and Statutory Interest as applicable to the facts of the acquisition. Set off and enhancement of value of land retained by JWS will also be taken into consideration.</p> <p>Both parties are to use reasonable endeavours to agree a final Compensation sum as soon as is possible after trigger of the option.</p> <p>When the total and final Compensation sum is agreed between CCC and JWS. CCC will pay within 90 days 100% of the agreed compensation sum less the sum of payments already paid.</p>
Interim Compensation	<p>CCC will pay 90% of its assessment of compensation (acting reasonably) upon trigger of the option.</p> <p>Following trigger of the option, Subject to;</p> <ol style="list-style-type: none"> 1. CCC's assessment of compensation (acting reasonably) changing to the extent that it is higher than the sum of payments already made. 2. A request in writing from JWS to CCC to make an Advance Payment of compensation that is agreed by CCC. <p>CCC will pay within 90 days of the request, further interim payments comprised that it agrees are due of 90% of its updated assessment less the sum of compensation payments already made.</p>
Dispute	<p>In the event of a dispute then either party may refer the matter to the RICS ADR for Compulsory Purchase Disputes service.</p> <p>https://www.rics.org/dispute-resolution-service/drs-services/adr-for-compulsory-purchase-disputes</p> <p>In accordance with the guidance, the parties may decide upon the binding/ non-binding expert determination or mediation.</p> <p>Alternatively, the parties agree the dispute can be referred, by agreement, to the Upper Tribunal (Lands Chamber) for determination as a reference by consent of the parties.</p> <p>The costs of the parties for the determination of the compensation due will be resolved in accordance with the principles and processes applying to costs within the Compensation Code.</p>
Conduct	<p>The parties agree to act reasonably and in good faith.</p> <p>The parties agreed to respond to communications from each other in reasonable period of time and to use reasonable endeavours not to cause unnecessary delay to the timing and programming of the CtoC TWAO and scheme delivery.</p>

Heads of Terms

Costs	<p>CCC agrees to meet JWS's reasonable surveyors costs reasonably incurred in connection with the agreement anticipated by these Heads of Terms, on completion of the agreement.</p> <p>CCC agrees to meet JWS's reasonable surveyor costs reasonably incurred in connection with agreeing the final consideration</p> <p>CCC agrees to meet JWS's reasonable Legal costs reasonably incurred in connection with the option agreement and subsequent transfers anticipated by these Heads of Terms such costs to be agreed between solicitors both parties acting reasonably. Costs for determining compensation will be calculated in accordance with the principles and processes applying to costs in the Compensation Code.</p>
	<p>Subject to</p> <ul style="list-style-type: none">a. Contractb. CCC approvalc. JWS approval

Accommodation Works

	TBC

Appendix K: Copy of the letter of objection dated 31st January from J & WR Sadler



J & W R Sadler
Littlefield Barn
Whitwell Way
Coton
Cambridge, CB23 7PW
e: rsadler@mandsestates.com
t: 07968 550 458

Secretary of State for Transport
Transport Infrastructure Planning Unit
Department for Transport
5th Floor, Great Minster House
33 Horseferry Road
London
SW1P 4DR

Sent by email only: transportinfrastructure@dft.gov.uk

31st January 2024

To: Secretary of State for Transport

RE: Cambourne to Cambridge (CtoC) Transport and works Act Order (TWOA) Submission of objection from stakeholder.
J & W R Sadler – landowner.

Executive Summary

I am writing to formally object to the proposed Cambourne to Cambridge (CtoC) route under consideration by the Greater Cambridge Partnership (GCP). While I am pro-development and understand the need for better public transport, the current scheme raises serious concerns about its impact on our family farm, the environment and community.

Most importantly, I strongly oppose the making of the Transport and Works Act Order (TWOA) for the CtoC busway, including the compulsory purchase of our land. This land, vital to our working family farm, includes areas protected by long-standing covenants and the burial site where my parents' ashes rest. The proposed scheme will cause irreversible harm to the environment, and I do not believe it has been properly justified. Furthermore, it ignores the CPPF route, a viable alternative that would deliver similar benefits at a much lower environmental and financial cost.

This letter sets out my detailed objections, drawing attention to the damage this scheme will cause and the failures in consultation and engagement by the GCP. I urge the Secretary of State to consider the issues raised and to ensure that any public transport solution for Cambourne to Cambridge reflects the needs of the community and the environment in which we all live.

I believe the GCP has a duty to pause and reconsider this project. Together, we can deliver a solution that protects the environment, respects local communities, and ensures public funds are used wisely.

Introduction

My name is John Sadler, I am 78 years old and a fourth-generation farmer of Madingley Hill. I farm in partnership with my wife, Wendy, who is also 78 and registered disabled. I am pro-development and recognise the importance of improving public transport infrastructure in the region, but the CtoC busway proposal in its current form is deeply flawed.

The land I farm is protected by covenants established in 1958 to give greater environmental protection to the area of countryside lying to the south of the A1303 from urban development. The covenanted land extends for approximately 1km from Madingley Road, the western approach to the city, through Coton Orchard to the M11 and West Cambridge and includes Madingley Hill which at 62 meters is the highest point west of Cambridge.

The proposed CtoC busway is often referred to as the 'off road' scheme although a significant proportion of the route is proposed to be built on existing roads. The proposed scheme fundamentally erodes the unique character of Madingley Hill and surrounding area which has been protected from inappropriate development since the early 1930's and threatens to cause irreversible harm to the unique and valuable natural environment. The destruction of the green belt land of the highest quality, loss of biodiversity, and disruption to established wildlife habitats, particularly Coton Orchard, when there is an alternative cost-effective scheme delivering similar benefits, is inconsistent with the Government's stated commitment to achieving net-zero emissions and protecting natural resources.

CtoC will sever my entire family farm, cut off three family homes, limit access to the farmyard, and make it difficult for my disabled wife to visit our grandchildren. The proposed route will force me to surrender land that includes the burial site and final resting place of my parents. Frank and Eileen Sadler farmed the land until they passed away in 1990 and 1995, respectively. Their dying wish was for their cremated ashes to be buried in a very special place on the farm they thoughtfully selected together. It allowed my father to keep an eye on the farm and all his neighbouring farming friends. It is the most peaceful location with breath taking views across open countryside and the city of Cambridge. The burial of the ashes was led by the local Parish vicar and I understand from the church that if the ashes are to be relocated, an application will need to be made to the Secretary of Justice and will require the landowner and next of kins blessing. The burial spot is where I would also like to be laid to rest and I consider myself and my family incredibly lucky to be custodians of this small part of the countryside.

Consultation Failures

Between 2014 and March 2024, Wendy and I only met with the GCP twice, once in 2020 and the second time in 2021 to discuss the route and how it will affect our farming operation, quality of life and most importantly the burial site of my mother and father. During these meetings, we were strongly led to believe that if the busway were to pass over or near the burial site, it would be our problem and responsibility to relocate the family ashes. We were not professionally represented at these meetings.

I have previously asked for the minutes, covering the two meetings chaired by the GCP in 2020 and 2021, and my requests were ignored. The GCP has now acknowledged that no minutes exist for these meetings.

Impact on the family farm

On an average day, we would be passing across the proposed CtoC busway 30 times, passing close to the burial site *along the ditch line which is the main route for us across the fields connecting the three homes and farmyard*. This includes my grandchildren walking and cycling, farm machinery from small ride on mowers to 40 tonne agricultural machinery and my disabled wife. As a family it provides us with the opportunity to pause and sit on the memorial bench, take in the views, and respectfully acknowledge the burial place of my parents. This has all been explained many times to the GCP and more recently at the meeting on the 9th of April 2024, and the site meeting held on the 26th of July 2024. The GCP has provided no comfort that we can continue using this route unfettered by the development of the CtoC busway. I've asked whether the passing point will be suitable for disabled users and I have been ignored. Despite our concerns, the GCP first provided us with plans with a passing point in the most inconvenient location possible. If we wanted to visit the burial site it meant a 40-minute delay and made farming the land near impossible. Then, after agreeing to provide two passing points (in writing), one of the passing points has been withdrawn without explanation.

I have always acted professionally and courteous and access has always been granted without delay for inspections and survey work conducted by the GCP. I first met the GCP's land agents, CBRE on 9th April 2024. I had assumed this to be the first meeting to discuss the scheme in detail and an opportunity for us

to explain our concerns once again. With agents acting on both sides, I was expecting to make positive progress even though I was not in favour of the proposed route.

On the 12th of March 2024, CBRE wrote the following to me:

'Please accept my apologies for you having to request sight of the latest design plans; we have been engaging with the land agent you appointed (Bidwells) last year and between us there has been an unfortunate lapse of communication arising from staff leaving the firm. Noting what you say around the location of the passes, which I assume are the crossing points over the busway (?), please be assured that the design is not yet fixed and we are open to feedback crossing point locations and other design matters.'

Clearly stating the design had not been fixed and other design matters can be discussed. However, we now know the scheme had been under a design freeze since February 2024, and yet no mention of this at the meeting on the 9th of April. If the scheme has been under a design freeze for so long, it raises serious questions over the direct clash of land use between the CtoC busway and the planned reservoir expansion near Comberton Long Road to facilitate the dire water shortage Cambridge currently faces. This was raised with the GCP but no explanation was given.

The GCP has known about the location of my parents' burial site since the beginning and has always stated that the busway would not pass over the burial site. The GCP have tried to suggest that we have misinformed the GCP with incorrect coordinates, but the GCP are unable to provide the minutes to support this. The only true way to have dealt with this matter is a site meeting accompanied by our respective agents and this did not occur until July 2024.

At this point I'd like to clarify what I understand to be referred to as the CtoC Busway. Over the past 60 years of farming, I have dealt with many utility companies and highways/county councils requiring land and easements across the farm, so I am very familiar with all procedures. I always deal with such matters in a positive and constructive way, negotiating in a straight line but I will call out when I am being misled or misinformed. As far as I am concerned, the busway is the total width of land that is to be compulsory acquired to facilitate the development, and in this case includes a tarmac road for buses, cycle way and landscaping belts either side. Over the years, I have asked several times how wide the busway (the entire strip of land) to be compulsory acquired will be and where it will run, but I have never been given a straight answer. I made my own investigations and after speaking to a transport planner, I understood the total width to be approximately 50m. This is an extraordinarily large area of land for a tarmac road carrying a handful of buses. Please see the images attached setting out what the busway will look like from an aerial perspective.

On the 26th of July 2024, the GCP agreed to plot the width of the land against the burial site. It was extremely disappointing to discover after so many years the burial site is located within 7m of the busway (the total strip of land to be compulsory acquired).

The GCP quickly responded to confirm yet again that the ashes 'were not within the busway'. Before the site meeting, the Cambridge Independent newspaper contacted me wanting to cover the story. The reporter directly asked the GCP about the busway and specifically asked the question if the ashes were within the busway strip that included the tarmac road, cycle way and landscape buffers? The GCP's response was that the 'ashes would not be within the busway'. When questioned further considering the evidence that the ashes were within the busway (the land to be compulsory acquired), the GCP explained that we (the GCP) have always told you that the ashes are not under busway and what we (the GCP) mean by that is that the ashes are not under the narrow 7.4m tarmac busway road. This was also reconfirmed in writing by the GCP.

I found these comments from the GCP to be misleading and disingenuous.

My parents' burial site has always been within the strip of land to be acquired by the local authority and the GCP have known this for many years. I have requested accurate minutes from the meetings held on

the 9th of April and 26th of July, and the requests have been previously ignored. I did receive draft minutes of the meeting held on the 9th of April; however, they were inaccurate. I commented on the minutes but they were ignored for several months. Eventually draft minutes for both meetings were circulated on the 27th of November 2024, four months after the meeting on the 26th of July and just two weeks after the TWAO orders were submitted. Even my Christian name was incorrect, and the list of attendees on the 26th of July was also completely wrong. The minutes remain inaccurate and incomplete from both these meetings and yet the GCP had months to positively engage with us and provide accurate records.

The total length effected along the road or across the field is approx. 1500m. The GCP has never discussed any alternative route along the A1303 with me. When this point was raised on the 26th of July, Jo Baker responded saying that if the busway were to run along the A1303 road, a significant swathe of land would be taken from the farm. It was if the GCP had made the decision for me, and yet I remain keen and willing to explore a scheme whereby I surrendered a modest swathe of land along the A1303 to accommodate a sustainable busway.

After the 26th of July meeting, the GCP acknowledged our concerns and confirmed fresh plans would be produced. Despite chasing and offering to meet the GCP several times, it took four months for the revised plans to be sent through. The plans arrived only two weeks before the TWAO were submitted. The plans were no different to previous plans, other than moving a passing strip from one side of a field to another. This work would have taken a junior designer no more than one hour work, and yet I had to wait for over four months with no explanation and no time to consider this before the TWAO was submitted.

Two weeks before the TWAO was submitted, extensive and detailed heads of terms were issued to me and yet there had been no dialogue between the parties leading up to this point concerning the principle terms of the agreement. To try and put this into context, the terms that were issued ran to eight pages and yet earlier this year (2024), the GCP wrongly issued heads of terms that had been prepared for me (without any consultation) but sent to the wrong landowner. These heads of terms were forwarded on to me by my neighbour and at no time were they issued by the GCP or its agents to me. These heads of terms were only four pages, and not only were they issued to another landowner, but they were also a cut and paste of the heads of terms between the GCP and St Johns College, with all the marked changes and points of negotiation still visible in the margins. I believed this to be a breach of GDPR rules, but this was dismissed out of hand by the GCP. A copy of the terms and correspondence is available.

I have never felt my concerns were being taken seriously and it was becoming obvious that I was being left behind as one of the last landowners to be addressed. Priority was given to the University of Cambridge and the Cambridge Colleges. In September 2024, I discovered the GCP had agreed to accept long lease agreements instead of compulsory acquiring the freehold of the land from the University of Cambridge (UoC) and the Cambridge Colleges – the UoC by its own admission is set to be the biggest beneficiary of C2C scheme. The UoC is also a board member of the GCP. No such offer was included in the detailed heads of terms that were sent to me on 27th November, despite previously requesting similar terms to the UoC and or the Cambridge Colleges. I am aware that one of the Cambridge Colleges gave the GCP an ultimatum. Either agree to the colleges' terms or we will object to the CtoC proposals.

Madingley Wood

The meeting on the 26th of July provided an opportunity to walk the road (along the A1303) with the GCP for the first time. It was acknowledged by the GCP that the Madingley Wood boundary is set back approximately 8m from the roadside edge. This is sufficient land to widen the road for a bus lane. The strip of land between the roadside edge and the wood, has been left unmaintained and several small trees and shrubs have established. Jo Baker from the GCP stated *'the trees (between the boundary of the wood and roadside) are more valuable than the trees at Coton Orchard that are set to be destroyed to accommodate CtoC'*. At the time, a tree survey was requested to support the GCP's statement. At first the GCP ignored the request, but eventually confirmed the strip of land had not been surveyed. Only a few weeks ago I learnt that Coton Orchard had submitted a TPO application nearly 12 months ago, and despite the standard 12-week statutory period for a decision, the application was held up for nearly a year and then finally refused on the grounds the trees are set to be destroyed to accommodate the CtoC

busway. However, at the time, it was fully acknowledged by the local planning authority that the orchard trees were worthy of TPO status. So, the statement made by GCP is false and misleading. Furthermore, if you placed a bus lane alongside the side close to the wood, the electric buses would act as a buffer to the wood. I have extensive photographs and video of the strip of land if needed.

Economic Weakness

The current and growing estimated costs of CtoC busway are disproportionately high compared to the alternative option. There is no evidence to suggest that the proposed scheme will deliver value for money or achieve the anticipated return on investment. Public funded infrastructure projects are required to demonstrate good value for money using the Department of Transport's Benefit Cost ratio. A figure below 1 is classified as 'POOR' and does not provide good value for money. According to the GCP, the BCR for CtoC scored 0.43, a figure well below the threshold for good value. Furthermore, the BCR calculation is based on a valuation that is 15 years out of date. Adding cost inflation over the 15-year period will only diminish the 0.43 figure further and worsen the financial case for CtoC. I also understand that the data sets used for the calculations have been taken from two different years that predate Covid. Surely for a scheme of this significance the data sets should be from one year alone and as up to date as possible.

The data that has been used to assess the merits of the scheme appears wildly out of date, inconsistent and fails to take account of the following:

- Modern working practices post covid.
- The closure of the Park and Ride facility East of the M11
- The EWR connections from Cambourne to Cambridge and connectivity to Bedford, Milton Keynes, and Oxford in a Westerly direction.
- Upgrades to the A14 and the duelling between Cambourne and the A1.

East West Rail (EWR)

In the 2024 Autumn Budget, Chancellor Rachel Reeves reaffirmed the government's position on East West Rail. Rather than using standard political terminology i.e. - 'supporting EWR', the Chancellor stated the Government '*Will deliver EWR*'... this strong messaging even surprised the East West Rail Company responsible for delivering the railway. EWR will deliver a direct route between Cambourne to Cambridge duplicating infrastructure and expense, and yet EWR has not been considered when assessing CtoC. EWR carries enormous support from the business community, something CtoC has failed to achieve. Accelerating EWR will provide a more integrated and future proofed transport solution for Cambridge and adjacent counties.

Alternative Route

With a limited budget, a detailed viable alternative route has been prepared. The CPPF scheme runs alongside and within the existing A1303. It will deliver similar journey times and capacity. It will cost considerably less and avoid Madingley Hill and Coton Orchard. Not only can it be delivered much quicker than the off-road option, but it also has wide community support. Yet this alternative has been largely ignored.

Conclusion

Please refer to the two images attached illustrating what the busway will look like. The busway will measure approximately 50m wide and plough over the top of one of the most beautiful rural landscapes in Cambridgeshire and will be seen from miles away. It's an unforgiving tarmac road, carrying up to eight buses an hour, but four of which will be traveling from Cambridge to Cambourne where there is no anticipated congestion. Effectively a 50m wide dedicated busway for four buses an hour, costing more than £300million. There is already a cycle route in place running alongside the A1303 and a further cycle route/bridleway is being upgraded directly south of the proposed CtoC busway to improve greener connectivity into the city.

A great deal of unpaid work has gone into preparing the alternative CPPF scheme. The alternative provides improved benefits and will cost considerably less. It can also be delivered much quicker and

saves Coton Orchard from destruction. The wider community is behind the alternative scheme as I am sure the local authority, counsellors, and MPs will be once they have been properly briefed and understand the total costs of CtoC both in monetary and environmental terms.

I do not object to a sustainable busway from Cambourne to Cambridge. The world has changed over the past five years and the proposed CtoC scheme is out of touch and doesn't fulfil the brief of today. When the CtoC busway proposal was worked up, it didn't take account of EWR, because at the time EWR was too far behind to consider as a reality. If EWR was operational today, we wouldn't even be having this debate over a road for buses.

The long-term environmental impact will negatively affect the quality of life for those effected by the proposed route. Greater engagement with local communities is essential to ensure their needs are adequately addressed and in the case of the proposed route, engagement failed at every level.

I urge the Government to consider the alternative route, accelerate EWR and leverage technology to implement flexible and responsive public transport options that meet actual demand and re-deploy the 100's of millions of pounds saved into more urgent and worthwhile public services. In light of these concerns, I respectfully request that you review the proposed Cambourne to Cambridge busway project and consider the alternative approach that aligns with environmental, sustainability, financial responsibility and community needs.

I am available at any time to discuss this letter of objection and I hope there will be the opportunity for me to speak at the public enquiry.

Thank you for your attention to this important matter. I look forward to your response and an acknowledgement to this letter of objection.

Yours faithfully

John Sadler

Plans & images

Appendix L: Land Ownership Plan

1. Identifies land farmed by J & WR Sadler.
2. *Shows extent of farm and location of family properties.*

Appendix M: Proposed Busway Alignment across the Sadler Farm

1. Map or diagram showing the route bisecting all working fields.
2. Illustrates severance and operational impact.

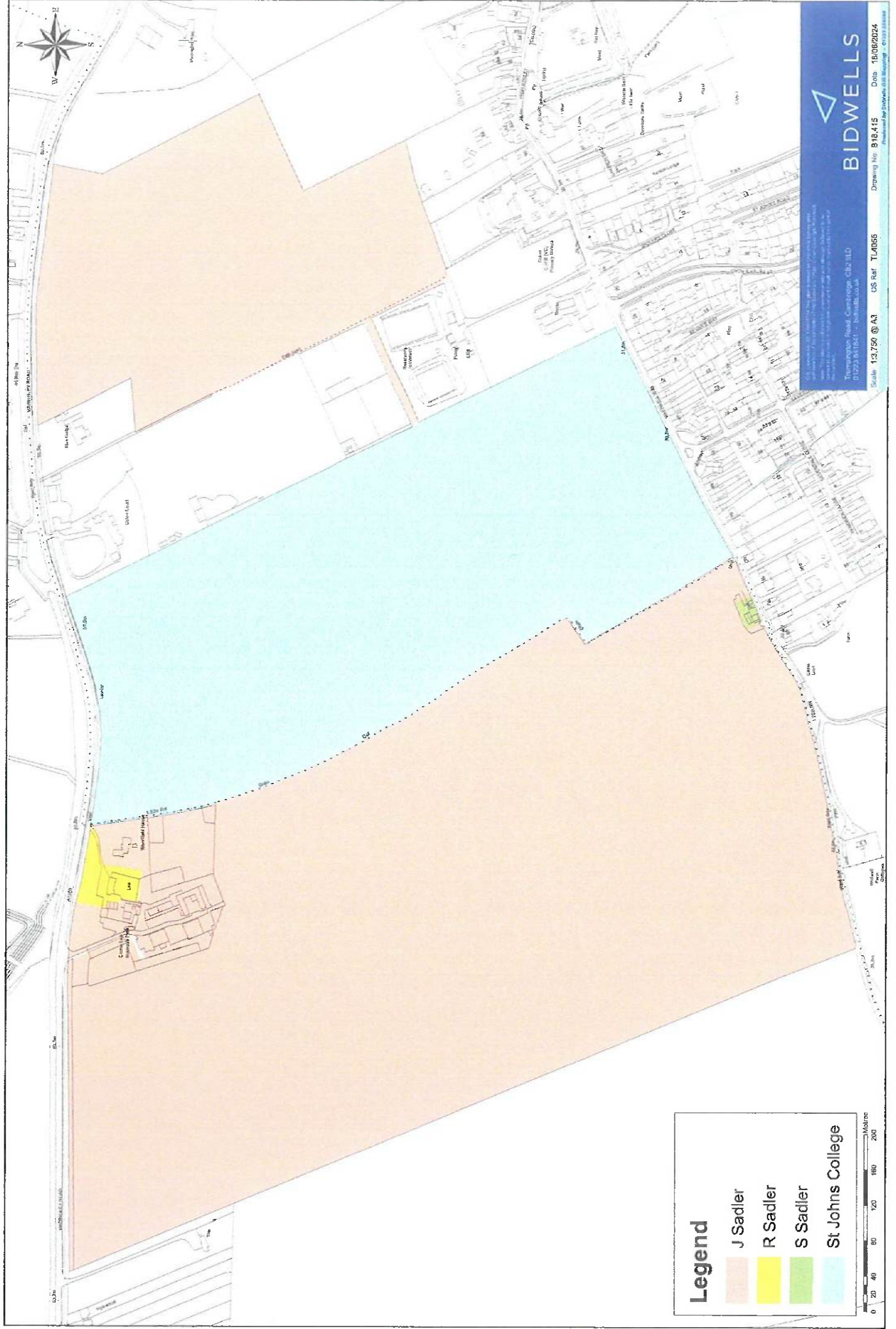
Appendix N: Photograph of the Farm (May 2025)

1. Depicts current working agricultural land and setting.
2. May include view from burial site or key access points.

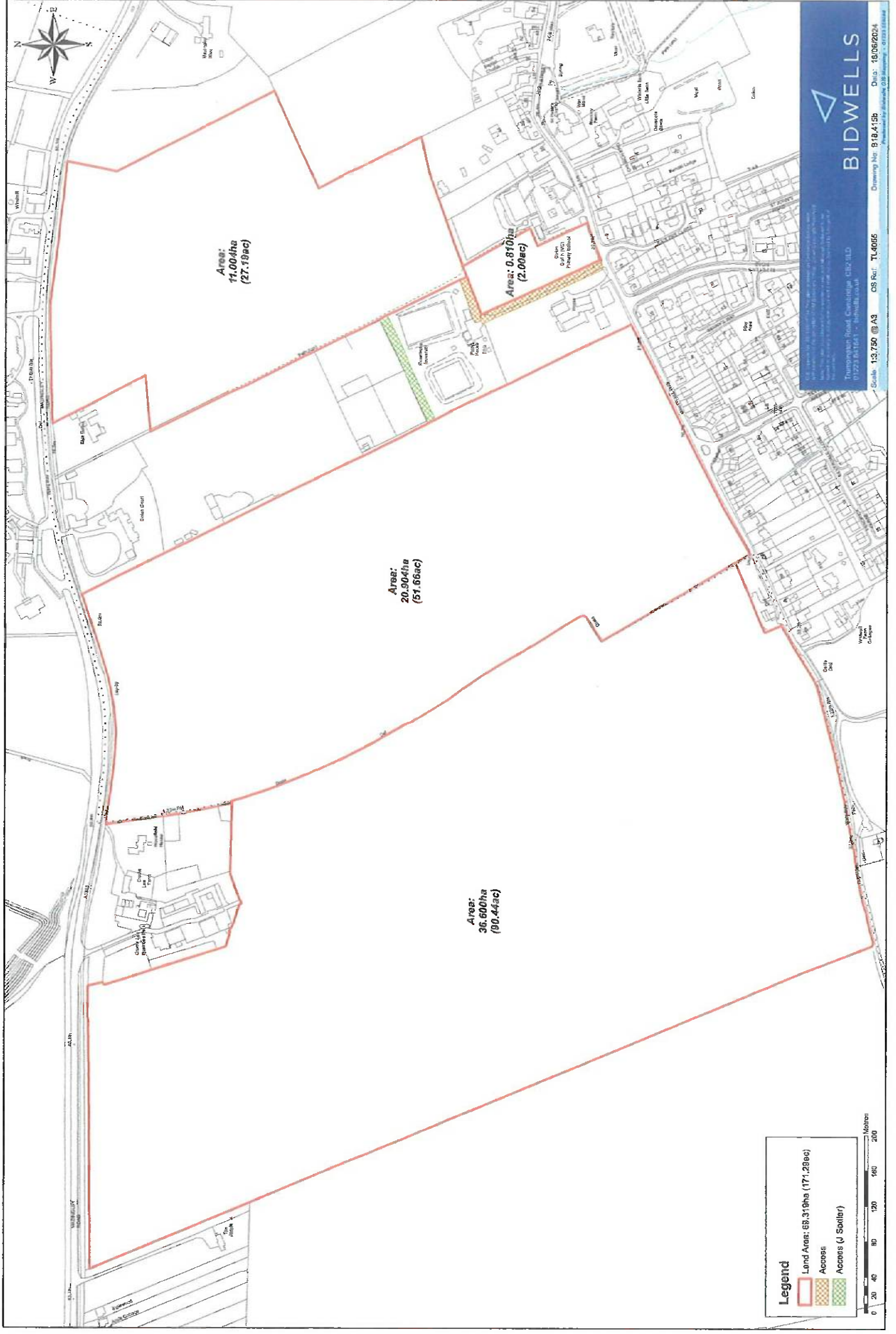
Appendix O: CGI Image of the Proposed Busway

1. Visual impression of the scheme, showing scale and proximity to working farm operations.
2. Useful to convey visual impact and loss of amenity.

Crome Lea Farm, Madingley Road, Coton, Cambridge, CB23 7PH



Crome Lea Farm, Maddingley Road, Coton, Cambridge, CB23 7PH



Cambourne to Cambridge route plan - Long Road to M11 section



