THE CAMBOURNE TO CAMBRIDGE ORDER

APPLICANT'S NOTE REGARDING COMPLIANCE WITH

STATUTORY PROCEDURAL REQUIREMENTS

19 June 2025

1. The Statement of Matters notes at paragraph 2 that the Secretary of State for Transport (**SoS**) will determine whether all statutory procedural requirements have been complied with. This note has been prepared on behalf of the applicant, Cambridgeshire County Council (**Applicant**), in response to this requirement.

2. References to rules in this note are to the Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006 (**Rules**). The Rules have been summarised below unless quotation marks are used.

3. Rule 10(8) requires the applicant to submit to the SoS "*evidence by affidavit of compliance with the provisions of rules 13, 14(1) to (8) and 15, and shall exhibit to any such affidavit copies of notices placed in newspapers and the London Gazette (and Lloyd's List if applicable) in accordance with rule 14*".

4. The application was made on 12 November 2024. The expiry date for objections was 8 January 2025.

Summary table

Rules	Actions	Dates
Rule 13	Service of application documents to local authorities, deposit in the House of Commons library, and service to those named in Schedule 5.	12 November 2024 (local authorities and House of Commons) 13 December 2024 (Office of Rail and Road, for information)
Rule 14	Publication of notice in the London Gazette and local newspapers, service of notice to those named in Schedule 6, and display of notices at proposed sites. Publication of notice and environmental information on a website maintained by SoS.	15 November 2024 (London Gazette) 11 and 19 November 2024 (Cambridge News) 12 November 2024 (service and display of notices, and notice and documents submitted to SoS for its website)
Rule 15	Service of Form 5 notice to those named in the book of reference.	12 November 2024 (service on those named in the book of reference, with some entities served later after the Applicant became aware of their interest) 17 December 2024 (King's College School) 27 January 2025 (P.X. Farms Limited) 4 June 2025 (Aquila Investments Limited)

Rules	Actions	Dates
Rule 10(8)	Submission of evidence by affidavit of compliance with rules 13, 14(1) to (8), and 15, including copies of notices placed in newspapers and the London Gazette.	30 January 2025, 20 May 2025 provision of affidavits confirming compliance with the Rules
Non-compliance	Removal of some notices before the expiry date for objections, with subsequent notification to the Department for Transport who confirmed no further action need be taken as the applicant would not resist the late submission of objections as a result of the removal of the notices.	7 January 2025 (removal), 10 January 2025 (notification), 13 January 2025 (response)

Rule 13

5. Rule 13 requires copies of the application and every document required to accompany it, together with a statement[1] specifying the capacity in which the recipient is served, the expiry date for objections, and the address to send objections / representations, to be:

5.1 served on every local authority in whose area the proposed works to which the application relates are situated[2];

5.2 deposited in the libraries of the House of Commons and, unless the SoS directs otherwise, the House of Lords;

5.3 served on those named[3] in column (2) of Schedule 5 to the Rules, where the application is for an order authorising the works or other matters specified in column (1).

6. In accordance with Rule 27(1)(b) and (2A) on 12 November 2024 the local authorities were served electronically. The application and accompanying documents were also made publicly available on the Greater Cambridge Partnership website (**Website**) and free internet access to view was provided at local libraries. On the same date, the applicant's solicitors deposited the documents with the House of Commons library via email, the case officer at the Department for Transport having confirmed that there was no need for the documents to be deposited in the House of Lords. Finally, on that date, those named in Schedule 5 were served with a hard copy letter with a link to the Website. The Office of Rail and Road were served on 13 December 2024 for their information.

Rule 14

7. Rule 14 requires the applicant to publish a notice[4] of the application in the London Gazette "*forthwith*". The notice must also be published in a local newspaper in the areas in which the proposals are intended to have effect, with publication required on 2 separate occasions, the first being not more than 14 days before, and not later than, the date of the application, and the second to be not more than 7 days after the date of the application.

8. The required notice was published in the following publications on the following dates:

8.1 London Gazette online on 15 November 2024; and

8.2 Cambridge News on 11 and 19 November 2024.

[1] Rule 13(8)(j).
[2] Cambridgeshire County Council, South Cambridgeshire District Council and Cambridge City Council
[3] See table at paragraph 11 of Affidavit of Richard Douglas Guyatt dated 30 January 2025 for those so named.
[4] Rule 14(1). The notice must give the applicant's name and address, to whom the application was made, that the application is subject to an environmental impact assessment, summarise of the main proposals, specify the location of the proposed works, and give the expiry date for objections, and the address to send objections / representations.

9. Rule 14(4) requires the applicant "*forthwith*" after the application is made to serve a notice[5] upon those named in column (2) of Schedule 6 to the Rules, where the application is for an order authorising works or other matters specified in column (1).

10. On 12 November 2024 those named[6] in column (2) of Schedule 6 to the Rules were served with a hard copy letter and notice including a link to the Website.

11. Rule 14(4A) requires the applicant to arrange for a notice[7], the environmental statement and any further environmental information required to be submitted under Rule 17 to be published on a website maintained by the SoS. The notice and accompanying documents were sent to the Department for Transport on 12 November 2024 and duly published on its website.

12. Rule 14(6) requires the applicant "*forthwith*" after the application is made to display a notice in the form of Form 2 in Schedule 2 to the Rules, upon or as close as reasonably practicable, the proposed site of works, at a place accessible to the public. Where the application is for an order which would include linear works exceeding 5km in length, the notice must be displayed at intervals of not more than 5km along the whole proposed route except where the land is covered by water.

13. On 12 November 2024 notices in the form of Form 2 were erected at, or as close as reasonably practicable to, the proposed site as required. These notices were checked weekly, and were monitored, recorded and replaced where necessary from 12 November 2024.[8]

14. Rule 14(7) requires the applicant "*forthwith*" after the application is made to display a notice in the form of Form 3 in Schedule 2 to the Rules, upon the right of way of street at, or as close as is reasonably practicable to, any proposed extinguishment of a right of way, diversion, stopping up or restriction.

15. On 12 November 2024 notices in the form of Form 3 were displayed at, or as close as reasonably practicable to, each point of extinguishment, diversion, stopping up or restriction. These notices were monitored, recorded and replaced where necessary from 12 November 2024.[9]

16. The Applicant must use best endeavours to ensure every notice required under rules 14(6) to (8) continues to be displayed in a legible form until the expiry date for objections.[10] The Applicant's agents regularly inspected the notices throughout the objection period.

17. On 7 January 2025, in error, some of the Form 2 and Form 3 notices were removed by the applicant's contractor, one day before the expiry date for objections. On 10 January 2025 the applicant wrote to the Department for Transport to inform them. The Department of Transport responded on 13 January 2025 referring to the minor non-compliance and confirming that, on the basis that the applicant would "*not resist any late objection prior to the close of the inquiry made by any party on the basis that the notices were not available on the 48 hours prior to the expiry period of objections*".

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[5] Rule 14(5). The notice must give the applicant's name, to whom the application was made, the address to send objections / representations, a statement as to whether the application is subject to an environmental impact assessment, a summary of the matters for which provision is to be made in the order, the names or details of places within the area to which the proposals relate where the application and documents may be inspected, or a website, and a statement that objections / representations are to be made in writing until the expiry date.

[6] See table at paragraph 9 of Second Affidavit of Richard Douglas Guyatt dated 20 May 2025 for those so named.

[7] Rule 14(5). The notice must give the applicant's name, to whom the application was made, the address to send objections / representations, a statement as to whether the application is subject to an environmental impact assessment, a summary of the matters for which provision is to be made in the order, the names or details of places within the area to which the proposals relate where the application and documents may be inspected, or a website, and a statement that objections / representations are to be made in writing until the expiry date.

[8] See paragraph 19 of Affidavit of Richard Douglas Guyatt dated 30 January 2025.

[9] See paragraph 19 of Affidavit of Richard Douglas Guyatt dated 30 January 2025.

[10] Rule 14(9).

Rule 15

18. Rule 15 requires the applicant to "*forthwith*" after the application is made to serve a notice in the form of Form 5 in Schedule 2 to the Rules upon all those named in the book of reference[11] (other than the applicant and the owner of any Crown interest).

19. On 12 November 2024 those named in the book of reference were served with a hard copy of the Form 5 notice with plan and extract of the book of reference listing plots which related to the recipient. Two addresses were included in the book of reference which related to a street which is not required to be notified, and accordingly these two addresses were not served.[12] The book of reference indicated that there are unknown interests in the Order land and accordingly a Form 5 notice was also erected on site addressed to the owner / occupier.

20. Subsequently it came to light that additional entities held interests in land which meant these entities should have been named in the book of reference:

20.1 King's College School was served with the notice on 17 December 2024. This was as a result of it only becoming known after the date of the application that King's College (itself not the freehold owner of the land in question) permitted King's College School to use part of the Order land.[13]

20.2 The current freehold owner of land at Scotland Farm, Dry Drayton (P.X. Farms Limited) was served with the notice on 27 January 2025. The freehold owner was asked to provide any objection to the application on or before 13 March 2025. The previous freehold owner, Dry Drayton Estate Limited, which shares a registered office and has a common director with P.X. Farms Limited, was served on 12 November 2024.

20.3 Aquila Investments Limited (**Aquila**), a wholly owned subsidiary of The Master, Fellows and Scholars of the College of Saint John the Evangelist in the University of Cambridge (**St John's College**), were notified on 4 June 2025. Aquila holds a Farm Business Tenancy and was not notified on 12 November 2024, although St John's College was named in the book of reference and notified as above.

Affidavits

21. The applicant's solicitors have provided two affidavits confirming the above (other than the updates contained in paragraphs 20.1 and 20.3), sworn on 30 January and 20 May 2025. The affidavits exhibit the documentation required by the Rules.

Womble Bond Dickinson (UK) LLP

19 June 2025

[11] Rule 12(8) describes the book of reference.
[12] See paragraph 16 of Affidavit of Richard Douglas Guyatt dated 30 January 2025 as corrected by paragraphs 5 and 6 of Second Affidavit of Richard Douglas Guyatt dated 20 May 2025.
[13] See paragraph 17 of Affidavit of Richard Douglas Guyatt dated 30 January 2025.