

Private & Confidential

Tuesday 7th January 2025

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Secretary of State for Transport
c/o Transport Infrastructure Planning Unit,
Department for Transport,
Great Minster House,
33 Horseferry Road,
London,
SW1P 4DR

Lambert Smith Hampton
55 Wells Street
London
W1T 3PT

By email transportinfrastructure@dft.gov.uk

Our Ref:
Your Ref:
File Ref:

Dear Sir,

The Cambourne to Cambridge Transport and Work Act Order

Objection on behalf of:

**CAMBRIDGE UNIVERSITY RUGBY UNION AND ASSOCIATION FOOTBALL TRUST LIMITED
("CURUAFT") in relation to land references numbers: 17-182, 17-181 and 17-184**

We are instructed by the Cambridge University Rugby Union and Associations of Football Trust Limited ("CURUAFT") who have a freehold and leasehold interest in land reference number plots 17-182, 17-181 and 17-184 ("the Property") which are identified within the Cambourne to Cambridge Transport and Work Act Order ("the CtoC TWAO").

We are instructed to make an objection to the CtoC TWAO on the following grounds:

- The acquisition is contrary to Article 1 of the First Protocol of Human Rights Act 1988.
- There is no compelling case in the public interest which would justify the compulsory acquisition of property held by CURUAFT.

The Promoter, Cambridgeshire County Council, are seeking to permanently acquire land which forms part of the Objectors larger landholding. The land parcels referenced above are located along the north of the rugby ground which impact the access along Rifle Range Road, the boundary fence, electricity supply, and maintenance of the stand, and then impacts the training pitch itself.

Should the Promoter succeed in securing the CtoC TWAO, without appropriate mitigation, this would have significant impact on the use and maintenance of the rugby ground and the facilities therein.

The CURUAFT has been in negotiation with the Promoter in good faith and principle terms for land transfer and mitigation of impacts have been discussed. However, at the current date there is no legally binding agreement which requires the Promoter to mitigate the impact of their scheme on the Objector.

The Secretary of State for Transport is therefore asked to have regard to the Objector's concerns about the scheme proceeding as currently designed and promoted under the CtoC TWAO.

We reserve the right to expand on these grounds of objection to the public inquiry and/or appear at an Inquiry if the agreement is not completed in time or in line with the principles discussed between the parties. We also reserve the right to add to these grounds should any new matters come to light which we are not currently aware of.

We would be grateful if you could acknowledge safe receipt of this letter, and that our client is recorded as a Statutory Objector.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'Nyear Yaseen', written in a cursive style.

Mrs Nyear Yaseen
Head of CPO - South