

8 October 2026

Ms Nancy Thomas and Mr Luke Regan
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By email only

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Our ref:
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Your ref:
TWA 25/APP/01

Dear Ms Nancy Thomas and Mr Luke Regan

**The Cambridge South East Transport Order
Pre-inquiry meeting on Tuesday 20 October 2026**

We are writing to set out a number of points which our client, Cambridgeshire County Council (the **Applicant**), hopes will assist the Inspectors at the Pre-Inquiry Meeting taking place on Tuesday 20 October 2026.

1. EXPERT WITNESSES TO BE CALLED FOR THE APPLICANT

- 1.1 Please find enclosed, the Applicant's list of appearances for the forthcoming inquiry. Oral evidence will be called from the Expert Witnesses in respect of the topics listed.
- 1.2 Matters relating to Aquatic Ecology, Hydrogeology, Flood Risk, Water Quality, Heritage, and Noise and Vibration have been agreed substantively between the Applicant and relevant statutory consultees. Therefore, in the interests of saving inquiry time, the Applicant proposes to deal with these topics by way of the submission of written statements, rather than through the giving of oral evidence. If the Inspectors, or any party disagrees with this approach or wishes to test this evidence through cross-examination, the Applicant would be grateful if this could be raised and discussed at the Pre-Inquiry Meeting.
- 1.3 We note the Inspectors' request to provide time estimates for the inquiry. At this early stage in the inquiry process, the Applicant's counsel are not currently in a position to provide a precise estimate of the time likely to be required for Examination in Chief and Cross Examination. However, we would be happy to provide the Programme Officers with an indicative inquiry timetable, if considered helpful at this stage. Once evidence has been exchanged, approximate time estimates for Examination in Chief and Cross Examination can be provided.
- 1.4 We can also make available, to the Programme Officers, a schedule containing availability for both our Leading and Junior counsel (Alexander Booth KC and Michael Fry of Francis Taylor Building respectively) as well as the Applicant's Expert Witnesses if this would assist.

2. INQUIRY TIMETABLING

- 2.1 We are mindful that the inquiry duration is expected to last for a number of weeks and that this is a significant time commitment for those parties actively involved in the inquiry. We are also

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mindful that the inquiry takes place over the Christmas period. In order to facilitate an efficient timetable, as well as minimise the necessity for inquiry attendance for participants as far as practicable, the Applicant proposes that the inquiry is split into three blocks which correspond with the scheduled inquiry dates as follows:

- 2.1.1 **Block 1 (Tuesday 8 December to Friday 18 December 2026)** during which the Applicant would propose to present its case and there would be an opportunity for third parties to cross-examine the Applicant's technical witnesses. The Applicant would not propose to re-call its witnesses unless there was a need to do so in response to matters raised during Blocks 2 or 3. We would propose that Block 1 also deals with evidence on behalf of the Greater Cambridge Shared Planning Service (subject to their availability).
- 2.1.2 **Block 2 (Tuesday 12 January to Friday 22 January 2027)** during which third parties who raise scheme wide objections can present their evidence and be cross-examined. We would also suggest Block 2 is programmed for evidence to be given by third parties raising site specific objections.
- 2.1.3 **Block 3 (Tuesday 2 February to Friday 12 February 2027)** which we suggest is available to complete the Applicant's case, dealing with planning policy and compulsory acquisition, to discuss planning conditions and hear closing submissions.

- 2.2 We note the Inspectors' suggestion that the inquiry could run on a topic by topic basis. However, the approach we have set out above is the Applicant's preferred approach. This would enable participants to attend for only those sessions of the inquiry which they consider relevant to them, reducing the necessity for full attendance and the associated costs and inconvenience of this for parties. For ease of reference, we have set this out as a preliminary programme in the table below:

Session	Dates	Suggested Programme
Block 1	Tuesday 8 December to Friday 18 December 2026	Openings Applicant's case and cross-examination of Applicant's witnesses Greater Cambridge Shared Planning Service's case and cross-examination
	Monday 21 December to Friday 8 January 2026	Non-sitting weeks (to account for the Christmas period)
Block 2	Tuesday 12 January to Friday 22 January 2027	Third parties raising scheme wide objections Third parties raising site specific objections
	Monday 25 January to Friday 29 January 2027	Non-sitting week
Block 3	Tuesday 2 February to Friday 12 February 2027	Applicant's case continued, dealing with planning policy and compulsory purchase matters, including cross examination of those witnesses Conditions Closings

- 2.3 We note the Inspectors' request that we retain availability for a final 2 week session (between 22 February and 1 March 2027), and confirm that we will do so, although on the basis of ongoing negotiations with objectors we hope (and anticipate) that this additional sitting time will not be required.

3. EXCHANGE OF PROOFS OF EVIDENCE

- 3.1 In order to allow for the smooth running of the inquiry and particularly to avoid the need to recall witnesses given the programme suggested above, we would propose that all parties' evidence is exchanged in accordance with the usual inquiry rules, 4 weeks prior to the opening of the inquiry with any rebuttals being served 1 week prior to the opening of the inquiry.
- 3.2 Given the number of parties taking an active role in the inquiry, as well as the number of expert witnesses who will appear at the inquiry, we propose to seek relevant parties' written consent to exchange proofs of evidence, appendices, summary proofs and rebuttals electronically. This will reduce paper consumption and cost for all parties. It is, of course, noted that the Inspectors will require hard copies of certain documents, plans and proofs of evidence, which the Applicant is willing to provide. In addition, proofs will be uploaded as Core Documents to the inquiry website.

4. STATEMENT OF MATTERS

- 4.1 The Secretary of State's Statement of Matters, enclosed with the letter dated 7 September 2026, states, at Item 1 the Secretary of State wishes to be informed of '*The aims and objectives of, and the need for, the proposed Cambridge South East Transport*'. Since the Applicant submitted and served its Statement of Case, a new draft Local Plan for Cambridgeshire has been published. The draft Local Plan provides for significant housing growth which, along with anticipated employment growth, supports the need case for the Scheme. The Applicant confirms that the evidence it will rely upon will include analysis of how the Scheme will support significant housing and employment growth.
- 4.2 At Item 2, the Statement of Matters states that the Secretary of States wishes to be informed of "*Whether all statutory procedural requirements have been complied with*". To address this, we have prepared a procedural note which is enclosed and which we propose is added to the Core Documents. The Inspectors will note that there was a short delay in the service of the Applicant's Statement of Case on some parties, and in the availability of the inquiry website upon which the documents referred to in the Applicant's Statement of Case were hosted. Given the significant passage of time between service of Statements of Case and the opening of the inquiry, we consider that no prejudice can have arisen from this. However, should the Inspectors (or any of the parties) have any further questions in relation to procedural matters, we would be happy to assist.
- 4.3 At Item 4(a), the Statement of Matters includes reference to Coton Orchard. The Scheme does not affect Coton Orchard. The Applicant believes that it is likely that this inclusion is in error and would be grateful if the Inspectors would confirm this at the Pre-Inquiry Meeting.
- 4.4 At Item 4(e), the Statement of Matters states "*The implications of the acquisition of arable farmland*." The Applicant should be grateful if the Inspectors could clarify the implications which are being referred to (environmental, financial, severance etc) at the Pre-Inquiry Meeting.
- 4.5 At Item 4(f), the Statement of Matters states "*Whether the scheme could increase the vulnerability of future development land through the severance of fields*." The Applicant understands that this relates to potential sterilisation of development land as a result of the Scheme but recognises that it could also mean that some land is more likely to be developed if sterilised. We should be grateful if the Inspectors could clarify the intention behind this item at the Pre-Inquiry Meeting.

5. CHANGE REQUEST

- 5.1 During the period of abeyance (27 October 2025 to 30 June 2026), the Applicant and NGT undertook a number of studies and engaged positively to agree mitigation for the interface between the Scheme and a high pressure pipeline known as FM03 – Gt Wilbraham to Whitwell. The agreed mitigation requires the Applicant to make a change to the application for the Scheme.
- 5.2 In addition, during the abeyance period, the Applicant has continued to engage with affected parties, to discuss concerns raised in objections and statements of case. As a result of this

engagement and following consideration of the representations made by affected parties, the Applicant has identified an additional two changes to the application which would assist in meeting the concerns of third parties.

- 5.3 The Applicant, therefore, submits a request to the Inspectors to make three changes to the application (together the **Change Request**). A copy of the Change Request and an explanation of the updates that would be required to the application documents, should it be accepted, is enclosed. As the additional changes, not related to the pipeline, are being sought in direct response to concerns raised by affected landowners, the Applicant does not consider them to be controversial. Affected landowners have been informed of the Change Request and where the Applicant has proposed an increase in Order limits, the landowner's consent to the change is provided. This letter has also been copied to those parties who have indicated a wish to participate in the forthcoming inquiry, so that they can provide any comments on the proposed Change Request to the Inspectors either in advance of or during the Pre-Inquiry Meeting.
- 5.4 To assist in the smooth running of the inquiry, the Applicant should be grateful if the Inspectors would make a determination on the Change Request as soon as possible following the close of the Pre-Inquiry Meeting. This will allow the Scheme as amended by the Change Request (if accepted) to be addressed in proofs of evidence. The Inspectors should note that an Environmental Addendum has been prepared to support the Change Request and the Applicant intends to formally publicise this should the Change Request be accepted. For the avoidance of doubt, no new significant effects are anticipated as a result of the Change Request.

6. UPDATES TO APPLICATION DOCUMENTS

- 6.1 Given the period of abeyance and ongoing negotiations, the Applicant proposes to update a number of application documents as follows:
- 6.2 Draft Order [**CD1-02**]
- 6.2.1 The Applicant proposes to submit a revised draft Order, to address corrections, and to update the protective provisions where agreement has been reached with statutory undertakers. The majority of these changes are typographical and so not substantive or considered to be contentious. Parties most directly affected, such as statutory undertakers benefiting from protective provisions, will be aware of the changes being made in this regard.
- 6.2.2 The Applicant also proposes to make some changes to the draft Order to ensure consistency (to the extent appropriate) with the modifications which the Secretary of State has confirmed will be made in respect of the recently granted application for the Cambourne to Cambridge Order. It is hoped that doing so at an early stage will save inquiry time which would otherwise be spent considering such matters.
- 6.2.3 The Applicant should be grateful if the Inspectors would confirm, at the Pre-Inquiry Meeting, that it is acceptable for the Applicant to submit a revised draft Order. Depending on the progress of negotiations with third parties, further modifications to the draft Order may be proposed by the Applicant in due course. Further modifications to the draft Order will also be required if the Change Request, discussed in paragraph 5 above, is accepted.
- 6.3 Book of Reference [**CD1-13**]
- 6.3.1 The Applicant is aware of title changes that have occurred since the submission of the application. In addition, some affected parties identified errors in the Book of Reference in their objections. The Applicant intends to submit a revised Book of Reference, following the Pre-Inquiry Meeting and, if appropriate, a further revised Book of Reference will be submitted before the close of the inquiry.
- 6.4 Deemed Planning Permission [**CD1-14**]

- 6.4.1 The Applicant has been engaging with the Greater Cambridge Shared Planning Services (**GCSPS**) in order to agree the form of planning conditions to be attached to the deemed planning permission in the event that the application for the Scheme is granted. Once these conditions are in agreed form with GCSPS, the Applicant will submit these to the inquiry. The Applicant hopes to do this shortly after the Pre-Inquiry Meeting and should be grateful if the Inspectors would confirm that this is acceptable.
- 6.4.2 Evidence given in proofs or during the inquiry, may give rise to further changes to the planning conditions. If this is the case, the Applicant will submit a further revised set of proposed conditions before the close of the inquiry.
- 6.5 Design and Access Statement [**CD1-17**]
 - 6.5.1 Following further engagement with GCSPS, the Applicant would also like to submit a revised Design and Access Statement. The Applicant would propose to do so following the Pre-Inquiry Meeting if acceptable to the Inspectors.
 - 6.5.2 If the Change Request is accepted, the Applicant will submit an updated Design and Access Statement to reflect the changes to the plans.
- 6.6 Flood Risk Assessment and Flood Modelling Report [**CD1-10.23** and **CD1-10.24**]
 - 6.6.1 As a result of engagement with the Environment Agency, the Applicant proposes to submit a revised Flood Risk Assessment and Flood Modelling Report following the Pre-Inquiry Meeting, if acceptable to the Inspectors.
- 6.7 Environmental Statement Addendum
 - 6.7.1 As a result of discussions with the Environment Agency, the Applicant has also concluded that dewatering is likely to be required for the foundations of the Hobson's Conduit and two River Granta crossings.
 - 6.7.2 The Applicant has assessed the impact of dewatering in these locations. The Applicant proposes to record this as part of the Environmental Statement (**ES**) Addendum submitted with the Change Request. Although, it will be noted that no new significant effects are considered likely as a result of the dewatering proposed. Should the Change Request not be accepted, the Applicant would propose to submit Section 4 of the enclosed ES Addendum as a standalone document.
- 6.8 Code of Construction Practice Addendum
 - 6.8.1 To provide an update to the construction management framework in response to design development, refinement of the construction methodology and further consideration of construction-related environmental and stakeholder requirements, the Applicant proposes to submit a Code of Construction Practice Addendum if acceptable to the Inspectors. This update would represent a refinement of the previously assessed construction strategy.

7. SUBMISSION OF ADDITIONAL APPLICATION DOCUMENTS

- 7.1 Following engagement with Historic England, and in order to address the issues raised by Historic England, the Applicant proposes to submit a Heritage Mitigation Strategy. This will be submitted following the Pre-Inquiry Meeting if acceptable to the Inspectors.

8. STATEMENTS OF COMMON GROUND

- 8.1 A list of the Statements of Common Ground which the Applicant proposes to enter into, subject to the relevant third party's agreement, is attached at **Appendix 2**. The Applicant considers the list to be comprehensive but would be grateful for an indication from the Inspectors as to whether

submission of Statements of Common Ground with these parties would assist or whether the Applicant should also seek to agree common ground with any other parties.

- 8.2 The Applicant has already concluded Statements of Common Ground with the Environment Agency, Historic England and West Suffolk Council, copies of which are enclosed. The Applicant would be grateful if these could be uploaded as Core Documents to the Inquiry website.

9. INSPECTOR SITE INSPECTIONS

- 9.1 We note that the Inspectors have asked parties to consider whether an accompanied site visit is required and, if that is the case, what locations should be included. We will liaise with affected parties and the Programme Officers on this point.

For ease of reference, a full list of enclosures to this letter is attached at **Appendix 1**.

This letter and its enclosures have been copied electronically to those parties who have submitted (or who the Applicant is aware, intends to submit) a Statement of Case (as listed in **Appendix 3**).

We hope the above information is helpful to the Inspectors and the parties intending to appear at the forthcoming inquiry.

Our client will be represented by Leading Counsel and Counsel at the Pre-Inquiry Meeting and so will be available to answer any questions or points of clarification in respect of the above matters as necessary.

Yours faithfully

Womble Bond Dickinson (UK) LLP

Womble Bond Dickinson (UK) LLP

APPENDIX 1: LIST OF ENCLOSURES

1. Applicant's List of Appearances
2. Applicant's Procedural Note
3. Change Request Documents
 - 3.1 Overarching Document
 - 3.2 Schedule of Changes to the Draft Order
 - 3.3 Schedule of Changes to the Book of Reference
 - 3.4 Environmental Statement Addendum
 - 3.5 Transport Assessment Addendum
 - 3.6 Amended Works and Land Plans
 - 3.7 Amended Public Rights of Way Plans
 - 3.8 Amended Proposed Site Plans
 - 3.9 Amended Construction Compounds
 - 3.10 Amended Section Drawings
4. Completed SoCG with the Environment Agency
5. Completed SoCG with Historic England
6. Completed SoCG with West Suffolk Council

APPENDIX 2: APPLICANT'S PROPOSED LIST OF STATEMENTS OF COMMON GROUND

1. Stephen Partridge-Hicks / Kelly Hathaway
2. Hobsons Conduit Trust
3. The British Horse Society / Swavesey & District Bridleways Association
4. The Cambridge Ramblers Association
5. Historic England
6. South Cambridgeshire District Council / Cambridge City Council (GCSP)
7. Cambridge Past, Present & Future
8. Better Ways for Busways / Magog Trust
9. Wellcome Genome Campus Limited
10. Fenline Users Association

APPENDIX 3: LIST OF THOSE ELECTRONICALLY SERVED A COPY OF THIS LETTER

1. Mr Meed
2. Mr B Kingsley
3. Dr E Turnbull- Jones
4. Cambridge Ramblers Association
5. Cambridge University Hospitals NHS Trust Foundation
6. One Haverhill Partnership and Haverhill Town Council
7. Railfuture East Anglia
8. AstraZeneca UK Ltd and Medimmune Ltd
9. University of Cambridge
10. Fen Line Users Association
11. West Suffolk Council
12. Mr G Gardener
13. B Reeve
14. Wellcome Genome Campus
15. Network Rail Infrastructure Limited
16. MediPark Ltd, CBC Estate Management Company Ltd, Prologis 120 Ltd and Prologis CCCIX SARL
17. Chalk Family
18. Mayor of Cambridge and Peterborough, Paul Bristow
19. Greater Cambridge Shared Planning Service
20. National Gas Transmission Plc
21. Cadent Gas Limited
22. Stephen Patridge- Hicks, Kelly Hathaway, CPPF, Better Ways for Busways, Magog Trust and Hobsons Conduit Trust
23. The Pembertons
24. Mr Sullivan
25. British Horse Society