

23 October 2026

Ms Nancy Thomas and Mr Luke Regan
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Our ref:
VJR2/VJR2/470360.2
Your ref:

Dear Ms Nancy Thomas and Mr Luke Regan

The Cambridge South East Transport Order

We write further to our letter dated 8 October 2026 and the Pre-Inquiry meeting held on 20 October 2026.

1. Inquiry Timetable

- 1.1 As explained at the Pre-Inquiry meeting, it is the Applicant's strong preference to present its case in advance of other parties presenting their case, and therefore, not to run the inquiry on a topic basis. This is the usual approach for applications determined under the Transport and Works Act 1992, where the purpose of the inquiry is to consider the application before it.
- 1.2 In this context it is right and fair that the Applicant is given an opportunity to advance its case before objectors' cases are heard. Rule 18(2) of the Transport and Works (Inquiries Procedure) Rules 2004 (**2004 Rules**) is clear that the applicant is entitled to begin and have the right of final reply, unless the applicant consents to the Inspector determining otherwise. A case by case approach was also taken for the Cambourne to Cambridge inquiry, so is familiar to those who participated in that inquiry.
- 1.3 We will provide separately to the Programme Officer a draft timetable which illustrates how a case by case approach could work in practice, subject of course to the number and availability of other parties, which is not yet known to the Applicant. We are willing to liaise direct with the other parties (and principally Better Ways for Busways) on their availability in this regard.
- 1.4 The Applicant has no objection to the Inspectors' suggestion of time being set aside at the start of the inquiry for interested parties to make oral submissions on the application, and this will be included in the draft timetable shared.
- 1.5 The Applicant has no objection to Better Ways for Busways presenting their case in a discrete block, but considers that Better Ways for Busways should cross examine on any scheme-wide issues when the Applicant's scheme-wide witnesses are called, as is usual at inquiry. Whilst the Applicant is content to recall its witnesses for site specific matters if necessary (e.g. in relation to issues arising in respect of Hobson's Conduit) it would not be an efficient use of inquiry time to do so for scheme-wide issues. At present, all of the Applicant's witnesses will deal with scheme-wide issues.

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2. Change Request

- 2.1 At the Pre-Inquiry meeting, the Applicant was asked to confirm the extent to which consultation had been undertaken on the Change Request. For the avoidance of doubt, the changes do not alter the description or nature of the application. The changes are also limited in scale. They can be categorised simply as (i) Change 1: an underground utility diversion; (ii) Change 2: design modifications (including to drainage and compound layout) to reduce impacts; and (iii) Change 3: reductions to the Order limits. All changes have been made to respond directly to concerns raised by interested parties and landowners in their Statements of Case.
- 2.2 Change 1 is the only change which increases the Order limits. It has been made with the express, written consent of the relevant landowner (Cheveley Park Farms), and has been made in collaboration with, and agreed by, the owner of the affected utility, National Gas Transmission (NGT).
- 2.3 Change 2 has been made to respond to concerns raised by Hobson's Conduit Trust, who were consulted on the change in advance of submission of the Change Request, as were the relevant landowners (the Pembertons) as well as the adjacent tenants (Prologis).
- 2.4 Change 3, which reduces the Order limits, has been made in response to and with the consent of the affected landowners (Corpus Christie and Deal Land).
- 2.5 None of the changes reduce the effectiveness of the mitigation or remove benefits which would otherwise be delivered by the Scheme. Neither do they give rise to new or different environmental effects from those assessed and reported upon in the Environmental Statement.
- 2.6 The Applicant also considered whether consultation with statutory bodies or interest groups should be undertaken before the Change Request was submitted. Greater Cambridge Planning Services were consulted on all three changes in their capacity as local planning authority, and no concerns were raised by them.
- 2.7 In respect of Change 1, both Historic England and the County's Historic Environment Team were consulted on the proposals in relation to potential impacts of the underground utility diversion on archaeological features, and neither raised any concerns. In addition, the Public Rights of Way team at the County Council were also consulted on the potential temporary impacts to public rights of way and, again, no concerns were raised. The new junction arrangements for the Travel Hub on the A1307 are in close proximity to the A11, for this reason, National Highways and the County Council in its capacity as local highway authority were also consulted on this change, and no concerns were raised.
- 2.8 In relation to Change 2, HCT was consulted on the changes which were made to address its specific concerns. The only other potentially affected party for Change 2 is Network Rail, which used a track running to a temporary compound to the south of the proposed busway during construction of the Cambridge South station. This track is proposed to be re-aligned as a result of the relocation of the ecology ponds. The Applicant consulted Network Rail on this re-alignment. Network Rail confirmed it has no objection to the change, on the basis that it no longer required the use of the temporary compound (and therefore the track) following completion of construction works for the Cambridge South station.
- 2.9 In advance of the Pre-Inquiry meeting, the Applicant notified the parties listed in Appendix 1 of the Change Request by emailing them a copy of the Applicant's letter dated 8 October 2026 (save for Ms Fyfe, which is explained further below). The Applicant understood this to be all parties that intended to take an active role in the inquiry, having previously submitted a Statement of Case. At the Pre-inquiry meeting, the Inspectors were informed that Ms Fyfe had submitted a Statement of Case but had not received a copy of the Applicant's letter. The Applicant confirms that this is correct. Ms Fyfe was not emailed a copy of the Applicant's letter because the Applicant was unaware that a Statement of Case had been submitted by Ms Fyfe until the Pre-Inquiry meeting.

- 2.10 The Applicant has investigated the position and understands that whilst Ms Fyfe's Statement of Case was sent to the Department for Transport on 19 September 2025, a copy was not sent to the Applicant or the Programme Officer. Ms Fyfe's Statement of Case was subsequently uploaded to the Inquiry website in June 2026 (almost 8 months after it was submitted), when the Transport Infrastructure Planning Unit forwarded a copy of it to the Programme Officer. However, the Applicant was not notified that the Statement of Case had been submitted or uploaded to the Inquiry website.
- 2.11 On the day of the Pre-Inquiry Meeting, immediately after being made aware of this situation, the Applicant sent a copy of the Change Request documentation to Ms Fyfe, and offered to discuss this further.
- 2.12 Other than Ms Fyfe's complaint, at the Pre-Inquiry meeting, no objections were raised to the Change Request. Overall, only one comment has been received in response to the Change Request: a comment regarding Change 2 on behalf of the landowners (the Pembertons). The Pembertons ask that the change to the temporary construction compound, already shown on the revised Deemed Planning Drawings and previously agreed by them, is reflected in the Works and Land Plans. If the Inspectors are content, the Applicant will address this minor inconsistency on the submitted plans in the event that the Change Request is accepted.
- 2.13 Mr Parker, representing Better Ways for Busways, indicated at the Pre-Inquiry meeting that he had yet to take instructions on the Change Request and would provide any comments by 23 October 2026. The Applicant received a letter dated 22 October 2026, from Richard Buxton Solicitors on behalf of Better Ways for Busways, confirming that Better Ways for Busways "*have no comment on the Change Proposals application procedure*". The Applicant is grateful for that swift confirmation.
- 2.14 During the Pre-Inquiry meeting, the Inspectors asked the Applicant to confirm that the procedural requirements in the Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006 (**2006 Rules**) had been addressed in so far as was necessary for the Change Request.
- 2.15 The Applicant notes that there are no procedural requirements in either the 2006 Rules or the 2004 Rules which address a request to amend an application which has been submitted under the Transport and Works Act 1992. Prior to submitting an application, under the 2006 Rules, the Applicant must, in summary:
- 2.15.1 Serve a copy of the application on relevant local authorities and deposit the application in the House of Commons and House of Lords (Rule 13(1));
 - 2.15.2 Serve a copy of/ notice of the application on relevant statutory parties (Rule 13(3) and Rule 14(4));
 - 2.15.3 Publish notice of the application in the London Gazette (Rule 14(1)) and in local newspapers (Rule 14(2) and (3));
 - 2.15.4 Publish environmental information on a website maintained by or on behalf of the Secretary of State (Rule 14(4A));
 - 2.15.5 Display site notices (Rule 14(6) and (7)); and
 - 2.15.6 Serve notice of the application on affected land interests named in the Book of Reference (Rule 15(1)).
- 2.16 The content of the notices to be provided is necessarily high level and in accordance with Rule 14(5)(d) requires only "a concise summary of the matters for which provision is to be made in the order for which application has been made (including....a statement that deemed planning permission... has been sought)". Forms of notice are provided in Schedule 2 to the 2006 Rules for this purpose. Given the limited nature of the Change Request, the changes, individually and collectively, would not alter the content of the notices which have already been provided,

including the summary of the matters to be included in the Order or the description of the development. Therefore, the Applicant's view is that there would be no benefit in undertaking these steps again. Indeed, issuing fresh notices could in fact lead to confusion amongst stakeholders.

- 2.17 Although there are no procedural requirements for submission of a change request during an inquiry under the 2004 Rules, a comparison can be drawn with the change request process for Nationally Significant Infrastructure Projects (**NSIP**) submitted under the Planning Act 2008. In that case, where the change would result in additional compulsory acquisition powers, the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 will be engaged unless consent from relevant landowners is obtained. As explained above, additional compulsory acquisition powers are only required for Change 1 and landowner consent has been obtained from Cheveley Park Farms. Therefore, were this a change request submitted for an NSIP under the Planning Act 2008, the compulsory acquisition procedural requirements would not be engaged.
- 2.18 Although not strictly required, the Applicant has also confirmed that, if the Change Request is accepted, notice of the Environmental Statement Addendum would be formally publicised in the local press. This notice would also summarise the nature of the changes and explain that relevant documents can be found on the Inquiry website. It would make clear that additional documents and environmental information will be made available throughout the course of the public inquiry on the Inquiry website and advise that this is regularly checked for updates.
- 2.19 In summary, the Change Request does not alter the nature or description of the application and the proposed changes are limited in scale. The Applicant took a targeted approach to consultation on the changes proposed before submission of the Change Request and no concerns in relation to the changes proposed were raised. The Applicant's view is that the approach adopted is appropriate and proportionate given the limited nature of the changes and that they respond to matters raised in interested parties' Statements of Case. The relevant and affected landowners and interested parties are supportive of the changes proposed and written consent has been provided where appropriate. The Change Request has been formally notified to those parties who have indicated an intention to appear at the Inquiry, and discussed in public at the Pre-Inquiry meeting. No objections to the Change Request have been submitted by any party, and there remains sufficient time within the Inquiry process to examine the application as amended by the Change Request. The Applicant has also confirmed that it will publish notice of the Change Request in local newspapers if the Change Request is accepted. Given this, the Applicant hopes that the Inspectors are able to confirm that the Change Request is accepted and, if it is accepted, a full suite of documents to effect the Change Request (including a complete set of revised plans) will be submitted to the Inquiry.

3. Additional Documents

- 3.1 We enclose the documents referred to in our letter of 8 October 2026, save for the updated draft Order, Book of Reference and procedural note which will follow on or before exchange of proofs, and the additional documents referenced by the Applicant during the Pre-Inquiry meeting held on 20 October 2026.
- 3.2 We also enclose the illustrative drawing requested by the Inspectors which shows the existing NGT pipeline and the approximate locations of the proposed NGT diversion and protective matting. Please note that this is an indicative sketch for information only and has not been drawn to scale. By way of further summary explanation, a short diversion of the pipeline is shown where it crosses the busway alignment. The purpose of this is to replace the existing pipeline with a more robust pipeline at the point where vehicles will cross it. In addition, across the section of the pipeline in proximity to the Travel Hub, a layer of yellow protective polyethylene matting will be laid underground above the pipeline, to provide a visual warning should anyone seek to excavate in the vicinity of the pipeline. Following completion of these works, the land would be reinstated.
- 3.3 For ease of reference, a full list of all documents attached (or to follow) can be found at Appendix 2.

4. Errata

- 4.1 We have reviewed the photomontages and can confirm that there is a discrepancy with Photomontage 10 which faces south west and Viewpoint 30 which faces south east. We will address this through either an errata or in the ES Addendum already proposed to be submitted.

5. Accompanied Site Visit

- 5.1 We enclose a separate note on the Applicant's suggested points for the accompanied site visit and associated plans of some of the key locations.

6. Administrative Arrangements

- 6.1 Finally, we can also confirm that hearing loop facilities will be available at the Inquiry if required and that it will be possible for the Inspectors to store their papers at the Inquiry venue over weekends when meeting at the same venue for successive weeks.

We confirm that we have copied this letter to the parties listed at Appendix 1.

Yours faithfully

Womble Bond Dickinson

Womble Bond Dickinson (UK) LLP

Appendix 1

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
23. Hobsons Conduit Trust
24. The Pembertons
25. Mr Sullivan
26. British Horse Society
27. East West Rail
28. Miranda Fyfe

Appendix 2

1. Updated Procedural Note (to follow)
2. Illustrative plans of the NGT diversion and protective works
3. Updated draft Order (to follow)
4. Comparison between original and updated draft Order (to follow)
5. Schedule of Changes to the draft Order (to follow)
6. Updated Explanatory Memorandum (to follow)
7. Updated Book of Reference (to follow)
8. Schedule of Changes to the Book of Reference (to follow)
9. Updated Design and Access Statement
10. Updated Planning Conditions
11. Updated Flood Risk Assessment

12. Updated Flood Mitigation Strategy
13. Code of Construction Practice Addendum
14. Heritage Mitigation Strategy
15. Technical Note: Economic Appraisal Refresh (2026)
16. Ecology Survey Technical Notes
17. Applicant's Note on the Accompanied Site Visit