

Statement on behalf of the Claimant

Witness: Dr Martin Cahn

1st Statement

Dated: 24 May 2026

Exhibits: MC/1-MC/4

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N:

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

Claimant

and

PERSONS UNKNOWN

being persons entering, occupying, residing on, bringing caravans/mobile homes onto, or carrying out development on land known as West of Moor Drove, Histon/Cottenham, Cambridgeshire

Defendants

WITNESS STATEMENT OF DR MARTIN CAHN

Land to the West of Moor Drove

I, Dr Martin Cahn am an elected Councillor of South Cambridgeshire District Council for the Ward of Histon and Impington

WILL SAY as follows:-

I make this statement in support of the Claimant's Claim for an injunction pursuant to section 187B of the Town and Country Planning Act 1990 (as amended) ("the 1990 Act").

I am duly authorised by the Claimant to make this witness statement and I make it from my own information, knowledge and belief save where otherwise stated.

This witness statement relates to Land to the west of Moor Drove, Histon Cambridgeshire which is shown edged in red on the plan Exhibit MC/1.

Following contact from concerned local residents, I personally visited the property at approximately 09.50am on Sunday morning 24th May 2026 and took three photographs of the site. The photographs were taken by me approaching the site along the access track (Exhibit MC/2) and from the south eastern corner of the main field (Exhibit MC/3 and Exhibit MC/4). The photographs show works that I observed being carried out using plant and machinery to move newly imported materials around on the site. The materials had been brought to the site via large HGV tipper trucks that had been reported to me by local residents to be travelling through the village of Cottenham and which I observed travelling along the access track when I attended the site.

When in attendance, I sought to engage with the gentleman in the white shirt shown in Exhibit MC/3 and MC/4 closest to the camera to determine what works were being carried out. He advised me that he did not know anything about the project.

I returned from my visit to contact the Chief Executive of South Cambridgeshire District Council in connection with the matter. I subsequently forwarded my photographs to the Chief Executive and Director of Planning and had a telephone conversation with the Director of Planning to discuss the outcome of my site visit and to explain the details in the photographs.

I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed [electronically]

Dr Martin Cahn

Dated 24 May 2026

Exhibit MC/1: Site Location Plan (the Land edged Red)

Exhibit MC/2: Photograph taken 24 May 2026 showing approach to field

Exhibit MC/3: Photograph taken 24 May 2026 showing works carried out on land edged red.

Exhibit MC/4: Photograph taken 24 May 2026 showing works being carried out on land edged red.



Imagery ©2026 Airbus, Maxar Technologies, Map data ©2026 50 m





