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Date: 14 September 2021

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

By Email: transportinfrastructure@dft.gov.uk

Dear Sirs

ISSUED ON BEHALF OF:

The RFA Pemberton 1995 Trust
The Pemberton Settled Estates (AFP)
The Pemberton Farming Partnership and Associated Businesses
Trumpington Farming Company
Richard Anthony Francis Pemberton and Anthony Pemberton as Personal Representative of Sir Francis Wingate William Pemberton
(together known as 'The Pemberton Trustees')

STATEMENT OF CASE

OBJECTION TO APPLICATION FOR TRANSPORT AND WORKS ORDER AT TRUMPINGTON MEADOWS AND ADDENBROOKES MEDIPARK BY NETWORK RAIL IN RESPECT OF THE ACQUISITION OF LAND ON A PERMANENT AND TEMPORARY LAND TAKE AND THE ACQUISITION OF RIGHTS OVER LAND IN RESPECT OF CAMBRIDGE SOUTH STATION NEAR ADDENBROOKES AND TRUMPINGTON MEADOWS

Transport and works order reference no.: TWAO/NRCS/047

The Pemberton Trustees and their associated farming partnerships and other businesses are the owners of and/or the owners and occupiers of property near Addenbrookes Hospital, Cambridge Medi Park, and Trumpington Meadows, and agricultural land to the south and east of Cambridge. An application for the acquisition of land, both permanent or temporary, or for the acquisition of rights, has been submitted and although there have been initial consultations these have not been concluded. Whilst the Pemberton Trustees are supportive of the proposed scheme, there are various proposals set out in the TWAO application that the Trustees object to. A meeting has been arranged with Network Rail and their agents and whilst we hope that most of the objections raised within this letter will be addressed, we continue to hold the same objections until further details regarding the scheme are issued to us.

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A part of the land is subject to lease hold interest to Cambridge Medi Park Ltd, which is the principle developer along with Countrywide for Cambridge Medi Park. The parties are aware that Cambridge Medi Park Ltd and Countrywide are submitting objections to the proposed acquisition of land and the Pemberton Trust support those and incorporate these objections within this letter. The principle grounds for objection are as follows:

1. The Extent of Land Taken

Parts of this land are subject either to leases to CML, or opted for leases for future development, for the provision of infrastructure, or for the provision of the country park and green environment. The extent of land permanently acquired should be kept to a minimum and The Pemberton Trust object to the extent of property being acquired under the scheme, particularly as to land east of the existing railway.

2. The Nature of Rights Taken

The Pemberton Trustees have been provided with an outline arrangement for the permanent acquisition of land and the acquisition of temporary rights either for the purposes of working or for constructing or realigning infrastructure, or for the acquisition of permanent rights for the installation of services. The Pemberton Trustees consider that the rights sought by Network Rail could be achieved through acquisition of rights rather than permanent acquisition of land. They therefore object to the proposed scheme of acquisition.

3. Infrastructure

Limited detail has been provided of the impact on the existing and proposed infrastructure in the form of roads, drains, services, and green infrastructure in the country park.

- (a) No detailed design has been provided as to the layout of access arrangements from existing roads to the proposed station. There is also impact on the access to future developments. These do not appear to have been taken in to account in the outline layout of the scheme.
- (b) Land drainage – The land take includes open drainage ditches and systems that provide storm water drainage from the existing and proposed developments, the country park, and from the surrounding farmland. Limited detail has been provided as to the nature of the works to be undertaken to maintain that drainage. Without such detail it is considered unsatisfactory to replace open ditches with underground culverts of limited capacity.
- (c) Green space and the country park – To the west of the railway line, the Medipark development provides for the provision of the country park and access for the public to open spaces and the proposed scheme reduces the extent of this, which potentially impacts on the arrangements of future development and the creation of the park.
- (d) Farm access – with reference to the attached plan, the land to be acquired, or the rights to be acquired, is on property immediate adjacent to farm land that is in the ownership and occupation of The Pemberton Trustees and its farming businesses. The farm land is situated east of the track and south of Addenbrooke's Road (shown shaded green). There is an adverse impact on the access to this land and the provision of future access appears to also adversely impact on, or conflict with, the provision of realigned public access and cycleways, which potentially restricts access to the retained farm land. Further detail of a satisfactory arrangement for this access is required.

4. Cambridge Guided Bus

The TWAO application for Cambridge South Station is running concurrently with an application by Cambridge South East Transport (CSET) for the extension and construction of a guided bus. There appear to be areas of potential conflict over land acquisition, access rights, or temporary acquisition of land for works, and the combined provisions of the Cambridge South Station and the guided bus appear to conflict with existing transport arrangements, much of which is over privately owned roads within the Cambridge Medipark. There appears to be a lack of collaboration and alignment of interests in that separate consultations and schemes are taking place and there is an opportunity for collusion that would create a more beneficial and less damaging transport arrangement.

The Pemberton Trust reserve the right to alter, enhance, amend, or provide further detail or amend objections or comments as the consultation process progresses and further details of the scheme emerge.

Yours faithfully



Bidwells

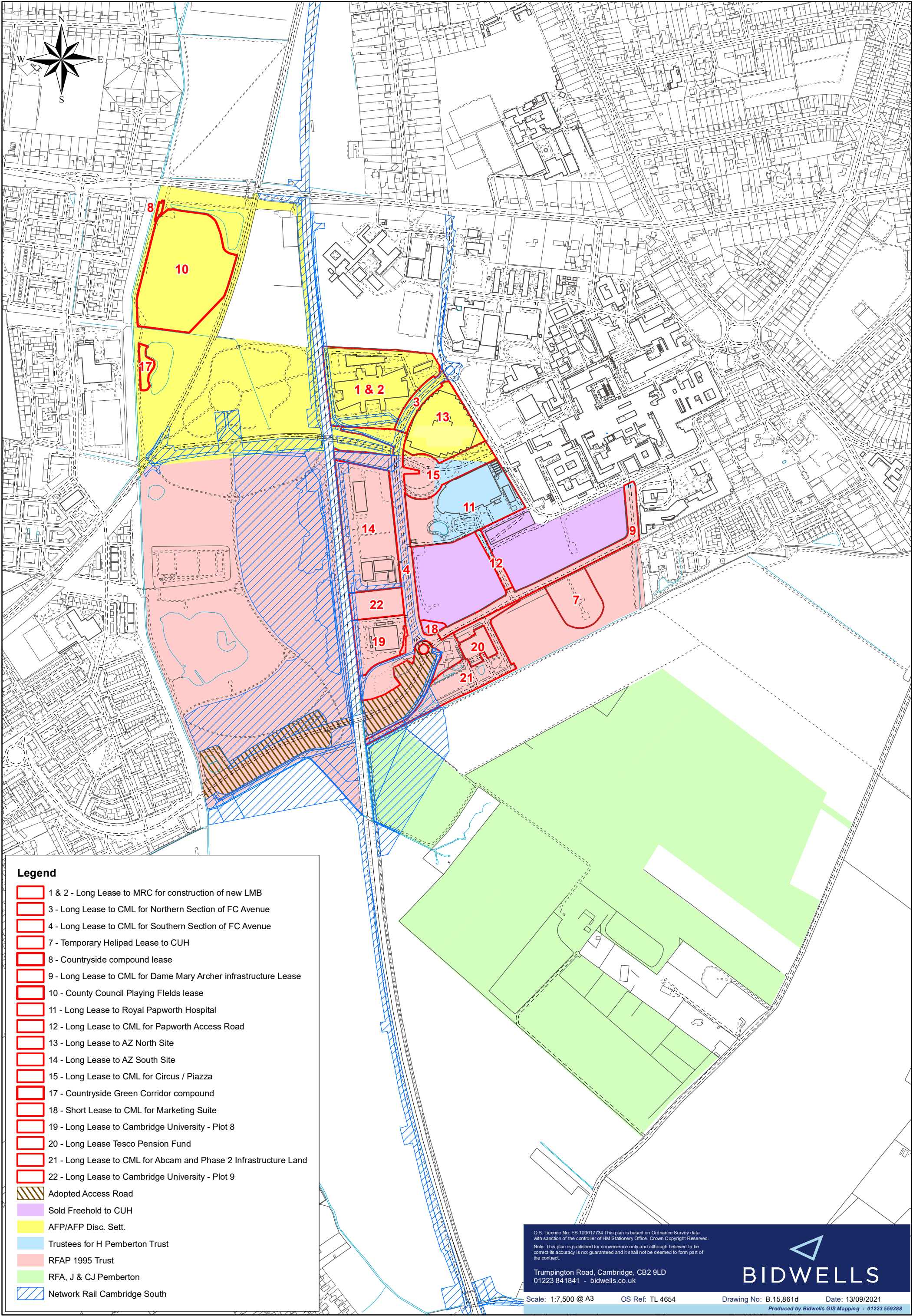
on behalf of The Pemberton Trustees and associated businesses

Address for correspondence regarding representations

J C Procter MA MSc MRICS ACI Arb

Bidwells, Trumpington Road, Cambridge, CB2 9LD

Jeremy.procter@bidwells.co.uk cc to Rebecca.mothersole@bidwells.co.uk



Legend

- 1 & 2 - Long Lease to MRC for construction of new LMB
- 3 - Long Lease to CML for Northern Section of FC Avenue
- 4 - Long Lease to CML for Southern Section of FC Avenue
- 7 - Temporary Helipad Lease to CUH
- 8 - Countryside compound lease
- 9 - Long Lease to CML for Dame Mary Archer infrastructure Lease
- 10 - County Council Playing Fields lease
- 11 - Long Lease to Royal Papworth Hospital
- 12 - Long Lease to CML for Papworth Access Road
- 13 - Long Lease to AZ North Site
- 14 - Long Lease to AZ South Site
- 15 - Long Lease to CML for Circus / Piazza
- 17 - Countryside Green Corridor compound
- 18 - Short Lease to CML for Marketing Suite
- 19 - Long Lease to Cambridge University - Plot 8
- 20 - Long Lease Tesco Pension Fund
- 21 - Long Lease to CML for Abcam and Phase 2 Infrastructure Land
- 22 - Long Lease to Cambridge University - Plot 9
- Adopted Access Road
- Sold Freehold to CUH
- AFP/AFP Disc. Sett.
- Trustees for H Pemberton Trust
- RFAP 1995 Trust
- RFA, J & CJ Pemberton
- Network Rail Cambridge South

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