

20 July 2021  
Your Ref: TWAO/NRC S/062  
Our Ref: JMW/SC/SJC 169

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The Secretary of State for Transport  
c/o Transport Infrastructure Planning Unit  
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Dear Sirs

**The Network Rail (Cambridge South Infrastructure Enhancements) Order – Land at Granhams Farm**  
**Reference: TWAO/NRCS/062**

We refer to the application made by Network Rail Infrastructure Limited to The Secretary of State for Transport, under Section 6 of the Transport and Works Act 1992 for the above mentioned order.

We act for St John's College, Cambridge, whom own freehold land which will be affected by this scheme. The College object to the proposed order on the following grounds:

1. Acquisition of replacement land for exchange open space land: Land is to be acquired for the provision of public open space to mitigate existing open space to be lost to the scheme. Four possible sites were considered for exchange land and these were scored accordingly. The scoring appears arbitrary and unjustified. For example, the "Quality" of site EL4 has been scored at 3 on the basis that the site is directly south of OS1. However, the site is not directly south of OS1, there is a significant road between OS1 and EL4. Therefore this site should have scored 2 points as per EL1, EL2 and EL3. Similarly EL4 was given a score of 4 for "Accessibility" on the basis that the site would be directly connected to PL1 via a new accommodation bridge. The accommodation bridge is designed to provide the landowner with an alternative means of access to replace the two level crossings which currently exist. Without this accommodation bridge the site would have scored the same or less than the alternatives. Therefore as the owner requires an accommodation bridge for future access, this has resulted in them being unfairly scored in relation to the open space requirement which in turn will require a significant area of land being compulsory acquired. This scoring matrix should be reviewed by an independent consultant, rather than by Network Rail who are promoting the project, to ensure that the outcome is fair and reasonable.
2. Closure of Dukes and Websters Level Crossings and new access arrangements: It is proposed to completely close two existing level crossings and create a new form of access from Addenbrookes Road. There are a number of significant issues with this proposal:
  - i) Network Rail have advised that the College will be granted a right of way from the public highway to the proposed accommodation bridge, with such a right of way being restricted to agricultural use only. St John's College believes that the existing two level crossings are not restricted to agricultural use and Network Rail have been asked to provide evidence of any such restriction. Network Rail have failed to provide any such evidence of the existing crossings being restricted. Therefore the new right of access must be unrestricted.





- ii) No design information has been provided to show the width and specification of the accommodation bridge. Websters Crossing has no restrictions in the form of width or weight of vehicles which may use it. The new accommodation bridge must therefore be similarly unrestricted allowing its use by any width and weight of vehicle. The lack of design detail also gives the landowner no comfort that they will have complete control over this alternative access. Should a member of the public park their car in front of the bridge, whilst taking their dog for a walk over the proposed open space land, then the tenant of the farmland would be unable to obtain access or egress from the land which this serves. Any business cannot be potentially restricted in this way.
  - iii) There is no design to show how an access will be taken from the accommodation bridge, across the open space land to the retained agricultural land. There needs to be a private unrestricted track linking the two to ensure that firstly such access rights cannot be obstructed by the general public, but secondly to eliminate any health and safety risks which would be created as a result of an access road passing over public open space.
3. Land being acquired for a permanent rail systems compound: An area of land adjoining the footbridge located at Shepreth branch junction, is being shown to be acquired for a new compound. No detail has been provided in terms of why this land is required and how it is to be used, and how it will interact with the existing Sustrans Cycleway. Furthermore, rights are being acquired across land owned by St John's College to provide a new means of access to this compound. Compulsory acquisition of land and rights over land, should not be granted to Network Rail until they are able to provide detail of what the land is to be used for and why it has to be acquired.
4. Costs: Network Rail are refusing to cover any landowner's costs, except those in relation to the claiming of compensation in relation to the scheme. This does not encourage landowners to enter into dialogue with the acquiring authority, and nor to attempt to find solutions to problems as it will give rise to costs for the landowner. In other situations I would normally expect the acquiring authority to cover all costs in relation to a scheme, other than those incurred in drafting an objection.

As a consequence of the above points, we would respectfully ask the Secretary of State for Transport to refuse to grant an order until Network Rail Infrastructure Limited are able to satisfy the above points.

Yours faithfully

**John Wootton**  
Director