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28 July 2021

By Email: [transportinfrastructure@dft.gov.uk](mailto:transportinfrastructure@dft.gov.uk)

Dear Sirs,

**THE NETWORK RAIL (CAMBRIDGE SOUTH INFRASTRUCTURE ENHANCEMENTS) ORDER  
ASTRAZENECA UK LIMITED AND MEDIMMUNE LIMITED**

CBRE is instructed by AstraZeneca UK Limited and Medimmune Limited to make representations in connection with the above Order made by Network Rail Infrastructure Limited (Network Rail) pursuant to section 6 of the Transport and Works Act 1992 for an Order under sections 1 and 5 of that Act.

Our Client has received Notices of Application for an Order dated 17 June 2021, under document references TWAO/NRCS/005 and TWAO/NRCS/071.

Our Client holds the long leasehold interest in the Cambridge Biomedical Campus at Francis Crick Avenue, Cambridge CB2 0AA held under LR Title No. CB401311, which includes and or adjoins plot numbers 036, 038, 039, 040, 041, 042, 043, 044, 045, 046, 047, 048 and 049 as shown on the Order Map.

We are writing to formally object to the proposed Order on behalf of our Client who wishes to reserve its position and as necessary submit evidence and appear at a Public Inquiry in the event that an agreement which addresses its concerns and protects its interests is not forthcoming.

Our Client is an in-principle supporter of the new station infrastructure and will continue to work proactively with Network Rail to resolve these physical constraints and other matters of concern which have emerged from the draft Order documentation.

**THE AFFECTED LAND**

The land is one of two parcels being developed by our Client to the south of Cambridge City Centre, known as the 'South Plot'. The ownership extends to an area of approx. 8 acres and has

planning permission for a South Office Building of 13,502 sqm; a Hive of 3,593 sqm; associated car, motorbike and cycle parking including a Travel Hub of 2,970 sqm; a temporary Multi Use Games Area; hard and soft landscaping; and internal roads, supporting facilities and ancillary infrastructure, approved under Reserved Matters permissions 14/1633/REM, 19/1070/REM and 20/05027/REM pursuant to outline approval 06/0796/OUT. Much of the works approved by these permissions has already been constructed/installed.

## **GROUND'S FOR OBJECTION**

The grounds for our client's objection are as follows:

### **1. Drainage Attenuation**

The Order land will prevent the ability to complete the drainage attenuation scheme for the site as detailed in the site Masterplan. Drainage of this site is incredibly complex and has been a major issue in the consenting of the site. We understand Network Rail will also require a drainage strategy for its project and our Client is seeking confirmation that there will be no consequent negative impact on its consented drainage scheme for the South Plot.

### **2. Car Parking**

The Order land identified for the emergency escape route from the new station to Francis Crick Avenue will remove 19 car parking bays which are required to be delivered under the planning consent for the site. Any loss of parking spaces would have knock on effects for the general site layout and future operation of the facility.

### **3. Proposed New Boundary**

Through engagement our Client understood that the area of land to be acquired had been agreed but the Order plans are inconsistent with this understanding. In particular the new boundary between the edge of the platform and the South Plot needs to be defined to enable our Client to be satisfied that delivery of its consented scheme of development can be delivered without being compromised by the taking of the Order land.

### **4. Existing Infrastructure**

Within the Order land our Client has already installed service infrastructure including a network of pipelines and boreholes for a ground source heating system, an earthing mat for the energy centre and a gas main. If this apparatus needs to be relocated both the consequential cost and the availability of space on the South Plot would be a major concern. If the apparatus can remain in situ the issue of protection from construction activity will need to be resolved and if the land has to be permanently acquired the question of our Clients land rights for the future operation and maintenance of the apparatus would be an issue.

### **5. Crane Locations**

Positioning of the cranes for both construction and future operation and maintenance need to be understood and agreed so that the potential for oversailing can be confirmed and

secured. Uncertainty in this regard could lead to inappropriate use or insufficient space within the arc of the cranes in future.

#### **6. Station Forecourt**

The two developments when completed need to sit side by side and with level differences across the sites it will be crucial to agree a scheme of hard and soft landscaping which is complimentary to both projects. Our Client expects to have an instrumental role in the development and agreement of this scheme recognising that this design detail is not currently refined sufficiently at this stage to finalise the levels and layout.

#### **7. Office Development**

The new South Office Building on the frontage of Francis Crick Avenue, adjacent to the proposed new forecourt will have its main entrance facing the forecourt and our Client is concerned that as a consequence of the Order it will lose its ability to influence the design and practicality of the frontage to the office. Additionally, the Order land in this area if not available for construction space could increase the difficulty of creating this building as consented. Our Client therefore expects this land to be made available if by the time the office development is started the Order land has been taken by Network Rail.

#### **8. Alignment of Programmes**

Recognising the uncertainty which currently exists across both project programmes, our Client is seeking a commitment from Network Rail that the parties will continue to engage and liaise collaboratively to enable delivery of the consented development on South Plot. This to include flexibility around occupation of land, timing of highway closures, installation of services and delivery of materials. In return our Client will offer the same commitment to Network Rail for timely delivery of its station.

#### **9. Easement Terms**

Plot 042 is identified in the Order land to provide a means of escape from the railway station in cases of emergency. The proposed terms and conditions for this easement are currently not stated in the order documents and must be properly understood and agreed with our Client as being proportionate and necessary given the identified limited need for these rights in the Order.

#### **10. Plot 039**

This plot which is intended for permanent acquisition includes a service tunnel held by our Client under a subterranean lease and a separate foul waste pipe held by our Client under an easement deed of grant. Our Client requires assurance in respect of protecting the tunnel and waste pipe due to the criticality of them to the operation of the site.

## POSITION

Our client intends to maintain the grounds of objection to the Order and requests that the Order should not be confirmed because Network Rail as Acquiring Authority has not satisfactorily addressed the above issues.

We would be grateful if you could acknowledge receipt of this letter. Furthermore, we would ask for the objection to be considered at any Public Inquiry held to assess the merits of the proposed Order. We reserve our Clients right to add to or amend these grounds of objection.

Should you require any further information or clarification of the issues raised then we would be grateful for all contact and correspondence to be addressed to Stephen Walker of CBRE (email [stephen.walker@cbre.com](mailto:stephen.walker@cbre.com)) in the first instance.

Our client's legal representatives are:  
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Any correspondence relating to this objection should be sent to both CBRE and McGuirewoods.

Yours Faithfully,

CBRE limited

**CBRE LIMITED**