

The Planning Inspectorate
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Your Ref: TR01008
Our ref: 19708

F.A.O : Nicholas Coombes, Case Manager.

Application by Highways England for an Order Granting Development Consent for the A14 Cambridge to Huntingdon Improvement Scheme; Notice of Preliminary Meeting.

On behalf of Napp Pharmaceutical Holdings Limited, Bard Pharmaceuticals Limited and Mundipharma Research Limited, the respective leaseholders of Units 196/198, 191 and 194 Cambridge Science Park, we attach a letter setting out our reasons for our request to speak to the Examining Authority at the Preliminary Meeting on 13 May.

I look forward to hearing from you in due course.

Yours faithfully

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6 May 2015

Dear Sir

**Planning Act 2008 (as amended)- Section 88 and Infrastructure
Planning (Examination Procedure) Rules 2010 (as amended) –
Rules 4 and 6**

**Application by Highways England for Order Granting Development
Consent for the A14 Cambridge to Huntingdon Improvement
Scheme**

**Notice of Preliminary Meeting, availability of relevant
representations and appointment of the Examining Authority**

We are instructed by Napp Pharmaceutical Holdings Limited, Bard Pharmaceuticals Limited and Mundipharma Research Limited, the respective leaseholders of Units 196/198, 191 and 194 Cambridge Science Park. These Units are used for the business of the network of independent associated companies to which our clients belong. Those UK members of the network (which includes our clients) are set forth on the attached schedule given in Appendix 1 to this letter and each should be regarded as an interested and affected party."

As an opening remark we would like to put on record that we have received short notice of the deadline for attending the Preliminary Meeting. The Planning Inspectorate letters dated Friday 17th April has given our clients little time to prepare and we reserve the right to mention this in the event that the question of costs fall to be discussed.

We wish to attend and speak at the Preliminary Meeting scheduled for 10am on Wednesday 13 May 2015 because we would like the opportunity to bring to the Examining Authority's attention that our clients consider that they have not been properly consulted about this Development Consent Order (DCO) proposal.



In particular, the lack of transparency as to what land take is being proposed as identified in the Book of Reference and by the Land Plan sheets 28 and 29, (plot references 28/17, 29/4 and 29/7) and the written notice of the pre-examination meeting to be held on 13 May 2015 is unacceptable and of great concern.

Our clients also wish to explain to the Examining Authority why they consider that Highways England have overlooked matters affecting their interests wish to reserve their right to have:

1. An "Issue Specific Hearing" relating to the proposed widening of the A14, as shown by the land plan sheets 28 and 29 and associated plot references: 28/17, 29/4 and 29/7;
2. A Compulsory Acquisition Hearing, because land will have to be compulsory acquired if the DCO is confirmed by the Secretary of State in accordance with the land plan plot references 28/17, 29/4 and 29/7; and
3. An accompanied site visit to the Cambridge Science Park with the Examining Authority, the Applicant and professional advisors to identify the land take required to accommodate the A14 road widening affecting Bards and their associated companies' leasehold interests at units 191,194,196 and 198.

Request for an Issue Specific Hearing

Although Bard's initial concerns have been raised in their representation received by the Inspectorate on 12 March 2015 – representation 670 – we also consider that an Issue Specific Hearing is required so as to bring to the Examining Authority's attention to the following:

- Insufficient consultation on the proposed widening of the Milton junction affecting units 191,194,196 and 198.
- Alternative widening options and associated land take requirements have not been thoroughly assessed by Highways England.
- How the proposed A14 widening works affects the ability of Bard and its Associate companies to use their long and short term leasehold interests at units 191, 194, 196 and 198 at the Cambridge Science Park. In particular, Bard consider that proposed Land Plan sheets 28 and 29 show that plots 28/17, 29/4 and 29/7 would result in the loss of around 90 operational car parking spaces.
- Impacts of the proposed A14 widening during the implementation of the works that may be permitted by the DCO.



We trust that our request to be able to speak to the Examining Authority at the Preliminary Meeting on 13 May 2015 will be considered favourably.

Yours faithfully



Mike Straw
Director



Appendix 1: Schedule of interested and affected parties

Napp Pharmaceutical Holdings Limited
Napp Pharmaceutical Group Limited
Napp Pharmaceuticals Limited
Napp Laboratories Limited
Qdem Pharmaceuticals Limited
Bard Pharmaceuticals Limited

Mundipharma Medical Company Limited
Mundibiopharma Limited

Mundipharma International Limited
Mundipharma International Services Limited
Mundipharma IT Services Limited
Mundipharma Research Limited

Clinical Designs Limited
Mundipharma Corporation Limited
Paineurope Limited

