

Cambridge Approaches

Response to the East West Rail 2026 Non-Statutory Consultation

Impact on Agriculture and UK Food Security

June 2026

Executive Summary

- ES.1** The proposed CS3 (Bedford to Cambridge) section of East West Rail will permanently remove approximately 2,500 hectares of Grade 2 Best and Most Versatile (BMV) farmland directly under its footprint. More than 50% of all wheat grown in England is grown within 50 miles of Cambridge. Cambridge Approaches estimates that the CS3 corridor produces food equivalent to the annual calorific needs of approximately 200,000 people (derived from approximately 2,500 hectares of Grade 2 cereal-producing land at typical yields — see note 3).^{3 4}
- ES.2** The railway footprint is only part of the impact. EWRCo has identified a new settlement of 40,000 homes at Tempsford and further growth of approximately 13,500 homes at Cambourne — together around 2,675 hectares at 20 dwellings per hectare on the CS3 corridor. EWRCo's business case presents Tempsford as an EWR-enabled settlement, predicated on a new CS3 station. On that basis, EWRCo must account for Tempsford's full land take as part of EWR's impact. The Secretary of State for Transport has separately stated that EWR as a whole can support up to 100,000 new homes across the Oxford to Cambridge corridor.^{5 6}
- ES.3** Grade 1 land is concentrated in the Fens north of Cambridge — low-lying, below sea level, dependent on pumped drainage. The Grade 2 land in the CS3 corridor is elevated, free-draining, and above sea level. As sea level rise progressively undermines Fenland viability, this elevated Grade 2 land becomes the strategic reserve. EWRCo proposes to build a permanent railway through the very land that will matter most.⁷

Cambridge Approaches' Demands

(1) This consultation was procedurally flawed; the agricultural land assessment must be published before the DCO is submitted. EWRCo asked the public to respond to a consultation on a project with major agricultural land impacts without publishing the Agriculture and Soils assessment the Planning Inspectorate explicitly required. The 2026 NSC closed on 9 June 2026 — too soon for any assessment published during the consultation to be meaningfully reviewed. The consultation was therefore flawed as a matter of procedure: the public, farmers, and farming organisations were asked to comment without the information needed to do so. EWRCo must publish its full Agriculture and Soils assessment — including the tabulation of BMV land by grade temporarily and permanently lost, specific justification for the use of that land, and consideration of BMV land in the alternatives assessment — sufficiently in advance of the DCO submission to allow genuine public scrutiny. Once the DCO is submitted (expected summer 2027), the public have a short window — typically 28 days after acceptance — to register representations. Detailed written representations follow during the examination period, which is expected to begin in early 2028. Influencing the scope of the assessment at that stage is procedurally demanding. This consultation response is submitted in part to establish a clear public record on the Planning Inspectorate's file before the DCO is lodged. Organisations that have evidenced their concerns at NSC stage are better placed to be heard at examination.

(2) Assess the full land take, not just the railway footprint. The cumulative land take assessment must include all land required by EWRCo's business case assumptions: the railway, housing (100,000 homes), employment development, and Biodiversity Net Gain land for all components. EWRCo cannot include 100,000 homes on the benefit side of the business case and exclude their land take from the impact assessment. The Planning Inspectorate has required a cumulative effects assessment. It must cover the full development enabled by the railway.

(3) EWRCo must comply with NPS NN para 5.168 and justify its failure to prefer the lower-quality northern route. National Networks National Policy Statement paragraph 5.168 imposes a positive duty: where significant development of agricultural land is demonstrated to be necessary, applicants must seek to use areas of poorer quality land in preference to higher quality. EWRCo's FOI-disclosed technical assessment shows the northern approach (NATC) takes 23% less BMV land than the southern route (SATC) in the Cambridge Approach section, is rated a Minor Improvement on agriculture, and a Major Improvement on biodiversity net gain. EWRCo has not published a full-route BMV tabulation. It must do so, and must explain — with evidence — why the NPS NN 5.168 preference for lower-quality land was overridden in route selection. Absent that justification, the Examining Authority should find the route choice non-compliant with NPS NN para 5.168.

(4) No BNG land on BMV agricultural land. Biodiversity Net Gain obligations — for the railway and for all associated housing and employment development — must be met on land classified as Grade 3b, Grade 4, or Grade 5, or on previously developed land. Creating habitat on Grade 2 farmland to offset the ecological impact of development removes productive soil

from food use in perpetuity. The BNG obligation must not itself become a driver of BMV land loss.

(5) Government to resolve the DEFRA/DfT contradiction publicly. The Government's Land Use Framework (published March 2026 — see note 9) explicitly safeguards BMV land for food production. The CS3 railway footprint, combined with the Tempsford and Cambourne housing developments and associated employment and BNG land, will remove in excess of 7,000 hectares from food production on the CS3 corridor — predominantly Grade 2 BMV farmland. No government body has publicly reconciled this with the Land Use Framework. Ministers must explain how approval of the EWR southern route is consistent with that Framework, and must establish a cross-departmental assessment of the cumulative food security impact before the DCO is submitted.

(6) EWRCo must demonstrate that the housing in its business case is genuinely EWR-dependent before the DCO is submitted. EWRCo cannot justify the permanent loss of thousands of hectares of BMV farmland on the basis of housing and employment growth that would occur regardless of the railway. The dependency test under DfT Transport Analysis Guidance TAG A2.3 para 4.1.7 requires that development attributed to the railway would not occur without it. EWRCo has not published a dependency assessment for Tempsford or Cambourne. If those developments are not EWR-dependent, they cannot be counted as benefits of the railway — and the land take they require cannot be attributed to EWR. If they are EWR-dependent, EWRCo must own the full land take. There is no version of this in which EWRCo claims the housing as a benefit while disclaiming responsibility for the land it requires.

(7) The DCO Examining Authority must look through the circularity between the local plan and EWRCo's business case. The Greater Cambridge Local Plan will allocate housing on the assumption that EWR will be built. EWRCo must not then cite those allocations at the DCO examination as independent proof of housing demand: if the local plan assumed EWR, it cannot be used as evidence that EWR is needed. If the local plan was made sound only by treating EWR as committed infrastructure — in the absence of a DCO, committed funding, or a credible benefit-cost ratio — that finding cannot be used by EWRCo as independent corroboration of housing demand at the DCO examination. The planning blight caused by premature local plan allocations on uncommitted infrastructure is itself a material harm that must be assessed as part of EWR's food security impact. Assumptions are not evidence.

(8) EWRCo must publish a soil restoration methodology and post-construction yield monitoring commitment covering all temporarily disturbed land. The distinction between permanent and temporary land take materially understates food production loss. EWRCo must publish: (a) a soil handling and restoration methodology compliant with the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites; (b) a commitment to independent yield monitoring on all restored compound, haul road, and earthworks storage areas for a minimum of fifteen years post-restoration; and (c) an assessment of cumulative food production loss from temporary land take, treating yield-depressed land as partially lost to food production for the duration of its recovery. Natural England required soil protection measures in 2019. The Planning Inspectorate required cumulative effects assessment in 2025. Neither has been satisfied.

UK Food Security: the strategic context

The current position

- 1.1 The United Kingdom is approximately 60% self-sufficient in food — a figure that has fallen from well over 70% in recent decades. Jeremy Moody, secretarial adviser to the Central Association of Agricultural Valuers, told the Royal Bath and West Show on 29 May 2026: "We look at the amount of food we could produce in this country, for consumption in this country, and that has been falling from well over 70% to now below 60%. We're now in a much more unstable set of international conditions and that raises pre-wartime type questions about what we could actually produce." ²
- 1.2 That dependency on imports rests on three assumptions: that global food production remains abundant, that trade routes stay open, and that other countries prioritise exports over feeding their own populations. All three assumptions are under structural pressure. Food price inflation in the UK peaked at 19.2% in 2023 following Russia's invasion of Ukraine. Food prices are now on track to be 50% higher in November 2026 than they were five years ago. The Iran conflict has closed the Strait of Hormuz to approximately 30% of the world's fertiliser chemicals and 20% of global oil supplies. The current heatwave — with temperatures potentially reaching 40°C this summer — is already reducing crop yields and causing heat stress to livestock. ^{1 2}
- 1.3 On 28 May 2026, nine senior food security experts wrote jointly to ministers warning that Britain is "sleepwalking into a food crisis". Professor Tim Lang, Emeritus Professor of Food Policy at City St George's University of London, stated: "Volatility is the new normal. We are in escalating trouble from climate heating, geopolitics, [the cost of] living squeeze and more." Retired General Richard Nugee described food security as "a top-level national security concern", warning that there is "the potential for disruption, of supply chains and of supply" such that the UK may not be able to "provide the sufficient food at the right price for its people". Richard Clothier, Managing Director of Wyke Farms, drew the parallel directly: "There's a lot of parallels between energy security and food security and we've seen quite blatantly how when things go wrong with energy how devastating it can be." ^{1 2}

Global food production under structural pressure

- 1.4 Global crop yields are projected to decline by approximately 8% by 2050 regardless of emissions trajectory — this is the conclusion of peer-reviewed research published in Nature Scientific Reports in 2025. This decline occurs even when farmers adapt. Cereal prices are projected to rise by between 1% and 29% at mid-century from climate change alone. The world's major grain-producing regions — the United States, Russia, Ukraine, northern India — are already experiencing yield instability from heat stress, drought, and extreme weather. ¹¹
- 1.5 Sudan is the most acute current example. Seventeen areas are in famine or facing imminent famine as of 2025. Twenty-four million people — half the population — are acutely food insecure. This is not an aberration; it is what happens when climate disruption, geopolitical conflict, and collapsed supply chains converge. The conditions producing it are not unique to Sudan. The UK is not insulated from the underlying forces. ¹²

The strategic argument: why farmland is a public good markets cannot price

- 1.6** Markets price everything at its current use value in current conditions. They systematically fail to price strategic assets — things whose value is contingent on future scenarios that current prices do not reflect. Defence capability, energy reserves, flood defences, and food production capacity share this characteristic: markets say they are worth less than they cost until the moment they are needed, at which point no price is sufficient. The Government's Land Use Framework — published March 2026 — acknowledges this implicitly when it says BMV land must be "safeguarded": you only safeguard things that markets would otherwise underprice and destroy. ⁹
- 1.7** The Irish famine of 1845–52 illustrates the consequence of confusing market value with strategic value. Potatoes fed a large population efficiently at current prices until a single pathogen broke the system. Cereals — wheat, barley, oats — have the opposite characteristics: storable for years, tradeable globally in bulk, calorie-dense and resilient. Phil Rayner of Glebe Farm Foods, whose family has farmed land at Chapel Hill, Haslingfield for over 400 years, makes the direct observation that cereals produce more calories per year per hectare in storable, tradeable form than almost any alternative. A country with deep cereal production capacity has strategic depth. A country dependent on cereal imports has a single point of failure at every port. ⁴
- 1.8** More than 50% of all wheat grown in England is grown within 50 miles of Cambridge. The Bedford to Cambridge corridor runs through the heart of this production zone. This is not generic farmland. It is the most strategically important cereal-producing landscape in England, and EWRCO has not assessed it as such. ³
-

The full extent of the land take

The railway footprint

- 2.1** The direct land take of the railway — track bed, embankments up to 10 metres in height, cuttings, drainage structures, safety zones, and construction compounds — at a corridor width of 500 metres over approximately 50 kilometres amounts to approximately 2,500 hectares. Parish-level analysis shows that in the worst-affected areas — Hardwick, Harston, and Toft — the railway removes between 16% and 20% of the entire parish area from agricultural use. ¹³
- 2.2** A local farmer who owns land directly in the path of the proposed route has calculated that the corridor as a whole produces food equivalent to the annual calorific needs of approximately 200,000 people. A single field on the chalk escarpment at Chapel Hill, Haslingfield — farmed by the same family for over 400 years, currently producing gluten-free oats for a national food brand — yields enough grain for approximately 30 million breakfasts per year. The railway, in its current alignment, would take or sever this field. ⁴

The business case land take: housing, employment, and BNG

- 2.3** The railway footprint is, however, only a fraction of the total land take implied by EWRCO's business case. The government has stated that EWR will "unlock opportunities for up to 100,000 new homes". EWRCO's £6.7 billion GVA figure is predicated on this housing and

the employment growth it supports. The land required by these assumptions must be counted as part of EWR's total impact.⁵

- 2.4** The table below sets out Cambridge Approaches' calculation of total land take based on EWRCo's business case assumptions.

Component (CS3: Bedford to Cambridge)	Area (ha)	BNG obligation (ha)	Source
Railway direct land take (500m x 50km)	2,500	250 (10%)	CA estimate
Tempsford new settlement (40,000 homes at 20 dph)	2,000	400 (20%)	EWRCo business case
Cambourne growth (13,500 homes at 20 dph)	675	135 (20%)	EWRCo business case
Employment land (CS3 corridor estimate)	~800	~80 (10%)	CA estimate
Total land take	>5,975	>865	
Grand total incl. BNG	>6,840	—	

- 2.5** On CS3 alone, the combined land take — railway, Tempsford, Cambourne, employment land, and BNG — exceeds 6,800 hectares. The Secretary of State for Transport has separately stated that EWR as a whole can support up to 100,000 homes across the Oxford to Cambridge corridor; if that wider development is attributed to EWR, total land take is in excess of 11,000 hectares. In either case, EWRCo cannot include the housing in its benefit calculation and exclude the land it requires from its impact assessment. The Planning Inspectorate has required a cumulative effects assessment that covers all associated and planned development. The Government has separately committed to creating a new national forest in the Oxford-Cambridge corridor (DEFRA, January 2026); EWRCo's consultation brochure references working with DEFRA on this initiative. If any part of that forest is planted on BMV land, the food security consequences are permanent and irreversible — see the discussion of national forests at section 5.^{5 8}

The BNG paradox

- 2.6** EWRCo has committed to delivering Biodiversity Net Gain of at least 10% along the route. At the CS3 scale of associated development — in excess of 5,975 hectares — the BNG obligation generates over 800 additional hectares of habitat land. In a corridor where Grade 3b, 4, and 5 land is scarce, there is a strong probability that BNG land will be sourced from productive Grade 2 farmland adjacent to the route. If so, EWRCo's environmental commitments become a further driver of BMV land loss. The BNG obligation must not itself remove food-producing capacity from the corridor.⁵

Why Grade 2 land will matter more, not less

The Fenland risk

- 3.1 The Agricultural Land Classification map of England and Wales — published by the Ministry of Agriculture, Fisheries and Food — shows the Grade 1 land concentrated to the north and east of Cambridge in the Fens. Parts of the Fens are already 3–4 metres below sea level. They are productive farmland only because of continuous, expensive pumped drainage maintained since the 17th century. The peat soils are oxidising and compressing: the land continues to sink even without sea level rise. ^{7 14}
- 3.2 The IPCC projects sea level rises of 0.3–1.0 metres by 2100 under central scenarios, with some studies reaching 4.7 metres under high-end pathways. The CPRE has found that 60% of England's finest agricultural land is already at the highest flood risk from climate change — the majority of it Fenland. A serious flood event would knock Grade 1 Fen land out of productive use for a decade or more: the 1947 and 1953 floods inundated over 160,000 acres and recovery was measured in years. ¹⁴

The elevated Grade 2 land is the strategic reserve

- 3.3 The Grade 2 land on the EWR corridor — the chalk escarpment and clay vales south and west of Cambridge — is elevated, free-draining, and above sea level. Its Grade 2 classification reflects minor soil limitations that are irrelevant in a world where the Fens are periodically waterlogged or saline. As climate change progresses, this land will become the most strategically valuable food-producing land in the region. It is the insurance policy: the reserve that remains productive when the Grade 1 Fen land is compromised.
- 3.4 EWRCo's Environmental Impact Assessment uses the Agricultural Land Classification as if it were a permanent and adequate measure of agricultural value. It is neither. The ALC was developed in the 1960s and reflects conditions that no longer fully apply. An infrastructure project approved in 2029 and operational until at least 2129 must be assessed against the value the land will carry across its full operational life. The Planning Inspectorate has confirmed the project lifespan as over 100 years. EWRCo's assessment must reflect this. ⁸

The cumulative ratchet

- 3.5 EWRCo will argue that its land take is small relative to England's total BMV stock. This argument treats each project in isolation. The CPRE has documented that BMV land losses to development rose from 60 hectares per year in 2010 to over 6,000 hectares per year by 2022 — a hundred-fold increase in twelve years. Solar farm applications are adding to this loss at pace, with between 100,000 and 250,000 hectares in the planning pipeline, a significant share of it on BMV land. HS2 took approximately 3,000 hectares. EWR CS3 alone could take in excess of 6,800 hectares; if the full Oxford-Cambridge corridor development is attributed to EWR, over 11,000 hectares more. Each project is assessed in isolation; each looks like a rounding error; together they are systematically dismantling England's food production capacity. The ratchet turns only one way: no developer has ever returned thousands of hectares of BMV farmland to food production. ¹⁴
- 3.6 The critical distinction between a railway and other forms of development is permanence. Solar farms have a typical life of 25–30 years; the Government has begun requiring land to

revert to agriculture at decommissioning. A railway is functionally permanent — and the Planning Inspectorate has confirmed a project lifespan of over 100 years. Of all the land uses competing with food production in the EWR corridor, a permanent railway is the most damaging and the least reversible.⁸

Impact on individual farm businesses

Permanent land loss and farm viability

- 4.1** The direct land take permanently removes farmland from food production. Several farms in the corridor are multigenerational family businesses in which land represents both the productive asset and decades of accumulated soil capital. The Countryside Regeneration Trust's Lark Rise Farm at Comberton has 24 years of continuous nature-friendly farming and ecological monitoring invested in it. Its tenant farmer, Tim Scott, has stated: "We are in the 24th year of nature recovery at Lark Rise. We have numerous red list species, and we are in the top one per cent of our county for these species and most, if not all of these, will be lost because of the railway."¹⁵
- 4.2** Even where land is not directly taken, the railway causes severe disruption to farm viability through severance. A large, regularly shaped field becomes two smaller, irregular parcels — each potentially uneconomic to cultivate with modern machinery. There are to be no level crossings on CS3; bridges and underpasses must accommodate wide agricultural equipment and may be sited at significant distances from the fields they serve. Embankments disrupt drainage gradients, causing waterlogging. Rabbit and muntjac populations using embankments as undisturbed habitat cause sustained, hard-to-control crop damage in adjacent fields.¹⁶

The Development Corporation

- 4.3** The proposed Greater Cambridge Development Corporation — consulted on earlier in 2026 — would transfer planning powers from South Cambridgeshire District Council to a centrally-led body with powers to capture land value uplift for public benefit. This creates a structural incentive: HM Treasury, which backs the project, stands to benefit from the development premium generated by EWR-enabled land value uplift. The Development Corporation is the mechanism through which that premium is captured. Food security is not a Treasury objective. The misalignment between the incentives driving the project and the food security consequences of its approval is not addressed anywhere in EWRCo's business case.¹⁰

Construction disruption: the HS2 precedent

- 4.4** The HS2 construction experience in Buckinghamshire provides a direct precedent for what EWR construction will mean for the farming community. In a parliamentary adjournment debate in March 2023, Greg Smith MP described construction compounds "swallowing up huge amounts of arable land, depriving countless farmers of their livelihoods"; flooded fields; unpaid bills; and years of unresolved claims. He cited one case where "Robert Withey's father sadly passed away under the enormous stress and anxiety caused by the project taking over the family farm." EWR CS3 is new-build railway through agricultural land of the same character. There is no reason to expect a different outcome.¹⁷

The housing demand that underpins the trade-off does not exist

- 4.5** EWRCo's central counter-argument to food security objections is that housing and commercial development generate greater economic value than farmland. This argument only works if the housing will actually be built and occupied. The evidence suggests it will not, or at least not at the scale or pace the business case assumes.¹⁹
- 4.6** The planning system has already granted 39,000 unbuilt consents in South Cambridgeshire. A Cambridge Development Corporation consultation proposes a further 150,000 to 250,000 homes with no stated dependency on EWR. EWRCo's transport model predicts that only 3% of Cambourne's working population would use the railway to reach Cambridge on a daily basis (EWRCo, Economic and Technical Report Appendices, May 2023, Table 4.1). DfT's Transport Analysis Guidance (TAG A2.3, para 4.1.7) requires applicants to apply a strict dependency test: development may only count as a benefit of the railway if it would not occur without it. On the evidence, the vast majority of the housing attributed to EWR would occur regardless. A trade-off that destroys in excess of 6,800 hectares of irreplaceable BMV farmland on CS3 alone — in exchange for housing growth that does not depend on the railway — is no trade-off at all.^{19 20}

Water stress: agriculture and housing compete for the same resource

- 4.7** The Environment Agency has confirmed, in its formal response to EWRCo's EIA Scoping Report, that the project area lies in a zone of serious water stress, that new consumptive groundwater licences are unavailable, and that surface water abstraction is restricted to high-flow periods only. Water Resources East states directly: "A lack of available water resources is now severely constraining growth in Eastern England." The four major supply schemes needed to resolve the deficit — the Fens Reservoir, the Lincolnshire Reservoir, and desalination plants at Bacton and Mablethorpe — all have target delivery dates at or after EWR's projected completion date.²¹
- 4.8** This matters doubly for food security. Agriculture in the EWR corridor competes for the same constrained water resource as the housing EWRCo proposes to enable. Irrigation of cereal and vegetable crops in a drier climate will require more water, not less. EWR-enabled housing growth would further reduce the water available to agriculture. EWRCo's economic assessment does not address this competition. The food security assessment required by the Scoping Opinion must do so.²¹

Planning blight: BMV land is lost before the DCO is granted

- 4.9** The damage to food production does not begin when construction starts. It begins when land enters a housing allocation in the local plan. The Government has required the Greater Cambridge Local Plan to be adopted by the end of 2026 — before EWR's DCO is submitted (summer 2027), before it is approved (earliest early 2029), and before any funding is committed for CS3, which has not been allocated in the current parliament. The next parliament may or may not choose to fund the railway.²²
- 4.10** The moment land is allocated for housing in an adopted local plan, its productive life as farmland begins to end. Landowners enter option agreements with developers; those agreements typically restrict farming operations, prevent long-term soil investment, and make agri-environment scheme applications unviable. Farmers stop applying for drainage improvements or capital grants on land they expect to lose. Banks withdraw lending against land held at agricultural value in a housing allocation. Tenanted farms reach the end of their terms and are not renewed. The land enters a planning limbo — functionally removed from active food production — that can last a decade or more before a spade enters the ground,

if it ever does. The HS2 precedent is exact: farms along that corridor were sterilised years before construction, some for fifteen years or more. This is already occurring on the EWR corridor: at least one local farm has been unable to obtain planning permission for a new grain store because the site falls within the proposed EWR route safeguarding area.¹⁷

- 4.11** This creates a logical trap with no exit for EWRCo and the government. If the Greater Cambridge Local Plan allocates housing in the EWR corridor on the assumption that the DCO will be granted, it is prejudging an outcome that has not been determined — and treating uncommitted, unfunded infrastructure as if it were consented. That is a soundness failure under NPPF paragraph 35, which requires allocations to be deliverable. If on the other hand the local plan allocates housing in the EWR corridor without EWR dependency — on the basis that the housing is viable regardless of the railway — then EWR fails the dependency test under TAG A2.3 and the housing cannot be counted as a benefit of the railway. There is no version of this in which EWRCo can simultaneously claim the housing as a benefit and disclaim responsibility for the land take that housing requires.^{19 20 22}
- 4.12** The food security consequence is immediate and certain regardless of how the circularity is resolved. BMV farmland is being removed from active production now — through option agreements, planning blight, and investment withdrawal — on the basis of a railway that has no funding commitment, a benefit-cost ratio the DfT's own Permanent Secretary has confirmed has fallen below 0.3, and a DCO that will not be determined until 2029 at the earliest. If EWR is ultimately refused or abandoned by a future parliament, the land will have been needlessly degraded for a decade on the basis of a speculative allocation. No mechanism exists to restore it.¹⁹

Temporary land take and permanent soil damage: the hidden multiplier

- 4.13** EWRCo's land take figures distinguish between permanent land take (the railway structure itself) and temporary land take (construction compounds, haul roads, earthworks storage, and satellite works areas). The temporary category is presented as land that will be returned to agricultural use after construction. This distinction is misleading. The food production loss associated with temporary land take is substantially larger — and lasts far longer — than EWRCo's framing implies.²⁵
- 4.14** EWRCo's temporary works maps show main construction compounds, satellite compounds, earthworks stockpile areas, and on-site haul roads occupying areas several times wider than the permanent railway footprint. In the Comberton to Shelford section alone (Route Section 7), the Chapel Hill main construction compound and the Charity Farm main construction compound are both large enough to cover several individual farm fields. Across a 50-kilometre corridor, the cumulative temporary take from compounds, haul roads, and soil storage will far exceed the permanent railway footprint.²⁵
- 4.15** Soil is not a material that can be temporarily displaced and restored without loss. It is a biological system built over centuries. The standard construction approach — stripping topsoil to 300-400mm, stockpiling it separately from subsoil, and reinstating in reverse order — fails routinely in practice on large infrastructure projects. Under time and cost pressure, layers are mixed. Mixed soil has altered texture, drainage, pH, and biological population. Construction traffic on subsoil and formation layers creates compaction at depth — below the reach of normal cultivation — that restricts root penetration and drainage for a decade or more. Farmers report that yield depressions from compaction remain clearly visible in their yield mapping data ten to fifteen years after a site has been formally restored. In the worst cases, where drainage gradients have been altered by embankments

- or cuttings, fields become seasonally waterlogged and may cease to be viable for arable cropping entirely.
- 4.16** The biological capital of productive soil — the microbiome, mycorrhizal networks, earthworm populations, and organic matter that determine its productivity — is largely destroyed by stockpiling. Research consistently shows that soil stored in piles for more than six to twelve months loses most of its biological activity. A construction programme of several years means that topsoil stripped from compound areas in year one may be reinstated to a biologically dead state in year four. Physical reinstatement of the soil profile does not restore its productive capacity. Recovery to something approaching pre-construction yields takes decades, if it ever fully occurs.
- 4.17** Natural England, in its formal response to EWRCo's 2019 consultation, required that any detailed scheme provide details of how adverse impacts on soils can be minimised, with reference to the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites. That requirement has not been discharged publicly in the seven years since. EWRCo has not published a soil restoration methodology, a post-construction yield monitoring commitment, or any assessment of the food production loss from temporary land take as distinct from permanent land loss. The Scoping Opinion's requirement for a cumulative effects assessment must encompass this category of harm.^{8 25}
- 4.18** A realistic assessment of food production loss from EWR construction must therefore account for: (a) permanent loss of the railway footprint; (b) degraded productive capacity on compound and haul road areas for a minimum of ten to fifteen years post-restoration; and (c) permanent loss of drainage viability on fields where embankments or cuttings permanently alter field drainage gradients. EWRCo's published figures address only (a). The total food production loss is substantially higher than the permanent land take figure alone implies.²⁵

The policy and governance failures

The DEFRA/DfT contradiction

- 5.1** The Government's Land Use Framework (March 2026) frames food security as national security and states that the most productive agricultural land must be safeguarded. DEFRA is responsible for food security and for the Land Use Framework. DfT is responsible for EWR. No minister or cross-departmental body has publicly reconciled the contradiction between the two. EWRCo's 2026 consultation brochure mentions "working closely with DEFRA" on a new national forest in the region — a biodiversity initiative. There is no evidence that DEFRA has been engaged on the food security implications of the railway at all. A national forest planted on BMV land would be, from a food security perspective, an act of irreversible vandalism: trees roots disturb soil structure permanently, the land is lost to food production for generations, and no national forest has ever been converted back to farmland.⁹
- 5.2** This governance failure is structural. Each department assesses EWR against its own objectives. DfT assesses connectivity and economic growth. DEFRA assesses nature recovery. Neither assesses the combined, cumulative food security impact of the railway and the 100,000 homes its business case depends upon. Nobody owns the strategic

question. This is precisely the failure that the Land Use Framework was designed to address — but it has no mechanism to apply its principles to decisions made by other departments.⁹

EWRCo's route logic is backwards on food security: FOI evidence

- 5.3** EWRCo cited in its 2021 consultation that a northern approach to Cambridge would pass through fen-edge land susceptible to flooding — and used this as a reason to prefer the southern route. From a food security perspective, this reasoning is the wrong way round. The susceptibility of northern route land to flooding is a reason to prefer it for the railway: it minimises the loss of elevated Grade 2 land that is the strategic reserve. A railway can be engineered to cope with flooding — raised on embankments or viaducts. Farmland destroyed by a single saltwater flood event is lost to food production for eight to nine years or more. One saltwater inundation, such as occurred in the Fens in 1949, leaves behind nematodes that make the land unworkable for nearly a decade. EWRCo should route the railway through the land that will flood regardless, not through the irreplaceable elevated land that will not.^{8 18}
- 5.4** EWRCo's internal technical assessments — obtained by Cambridge Approaches under the Freedom of Information Act — confirm that the northern approach (NATC) is better for agriculture than the southern route (SATC). The assessment covering the Cambridge Approach section (ACP7) shows the following BMV land take comparison:²³

	SATC (Southern route — Baseline)	NATC (Northern route — ACP_C4)
BMV Grade 1	0 m ² (0 ha)	12,434 m ² (1.2 ha)
BMV Grade 2	1,367,073 m ² (136.7 ha)	762,058 m ² (76.2 ha)
BMV Grade 3a	289,777 m ² (29.0 ha)	571,174 m ² (57.1 ha)
Total BMV land	165.7 ha	134.5 ha
Overall agriculture rating vs southern route	Baseline	Minor Improvement
BNG achievability rating vs southern route	Baseline	Major Improvement

Table 2: BMV land take by grade, Cambridge Approach section (ACP7) only. Source: EWRCo Technical Partner Environmental Assessment Factor Analysis, obtained under Freedom of Information Act.

- 5.5** The FOI data reveals three critical points. First, the SATC takes 23% more BMV land than the NATC in the Cambridge Approach section alone (165.7 ha versus 134.5 ha). Second, all of the SATC's BMV land is Grade 2 — the elevated, free-draining, flood-safe cereal-growing land that is the strategic reserve. The NATC's BMV land includes Grade 1 and Grade 3a — predominantly Fen-edge land that climate projections show will be progressively compromised by flooding. Third, EWRCo's assessors rated the NATC a Minor Improvement over the SATC for agriculture, and a Major Improvement for biodiversity net gain. EWRCo chose the southern route anyway — without any weighting for food security in the assessment framework.²³
- 5.6** These figures cover only the Cambridge Approach section. EWRCo has not published a full BMV tabulation for the entire 50-kilometre Bedford to Cambridge corridor — precisely what the Scoping Opinion (para 3.1.4) requires. The full corridor at 500 metres width covers approximately 2,500 hectares, of which a substantial proportion is Grade 2 BMV farmland. The ACP7 figures are a fragment. The absence of a published whole-route BMV tabulation

is not an omission — it is a failure to comply with what the Inspectorate has explicitly required.^{8 23}

- 5.7** National Networks National Policy Statement paragraph 5.168 places a positive duty on applicants: they must take into account the economic and other benefits of the best and most versatile agricultural land, and where significant development of agricultural land is demonstrated to be necessary, they must seek to use areas of poorer quality land in preference to higher quality land. This is not a requirement to acknowledge or recognise BMV land. It is a requirement to prefer lower-grade land when a choice exists. The FOI data shows a choice exists and that EWRCo's assessors identified the northern route as better on agriculture. EWRCo must explain, with evidence, why the NPS NN 5.168 preference for lower-quality land was not applied in its route selection.^{23 24}

The EIA process: what has been required and what the public has not seen

- 5.8** Natural England, in its formal response to the 2019 EWR consultation, confirmed that the main land use in the corridor is Agricultural Land Classification grades 1 and 2 — Best and Most Versatile land — and required a detailed ALC survey (one auger boring per hectare, with pits dug to 1.2 metres depth to confirm full soil profile), an assessment of how adverse impacts on soils can be minimised, and application of the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites. That was in 2019. The Planning Inspectorate's Scoping Opinion in 2025 required the same things again. Seven years on from Natural England's requirements, no detailed ALC survey, no soil restoration methodology, and no food production impact assessment has been published.²⁵
- 5.9** EWRCo submitted an EIA Scoping Report to the Planning Inspectorate in January 2025. The Planning Inspectorate issued its Scoping Opinion in February 2025. That Opinion was distributed to statutory consultees only — Natural England, the Environment Agency, Historic England, local authorities — not to the public, to farmers, or to farming organisations. It requires EWRCo to produce a clear tabulation of BMV land by grade temporarily and permanently lost; specific justification for the use of BMV land; consideration of BMV land in the alternatives assessment; and a full cumulative effects assessment covering all planned and associated development.⁸
- 5.10** None of this has been shared with the public. EWRCo's 2026 Non-Statutory Consultation brochure — 153 pages — contains no agricultural land classification data, no food security analysis, no BMV tabulation, and no cumulative land take calculation encompassing the associated housing. It refers to "agricultural property impacts" as one of many EIA topics and mentions that farm business interviews have been conducted. This is not an adequate discharge of the Inspectorate's requirements, and it is not adequate public consultation on an impact of this magnitude.⁸
- 5.11** The 2026 NSC is the last public consultation before the DCO is submitted. Once the Environmental Statement is published simultaneously with the DCO application, the public can attend Examining Authority hearings, but influencing the scope of the assessment at that stage is procedurally demanding. Cambridge Approaches requires EWRCo to publish its agricultural land assessment methodology, its preliminary BMV tabulation, and its cumulative land take analysis as part of this consultation — not as a component of a document released when there is no further opportunity for substantive public comment.

The local plan circularity: a governance failure with no owner

- 5.12** The government has required the Greater Cambridge Local Plan to be adopted by the end of 2026. The DCO will be submitted in summer 2027 and, on current timetables,

determined in early 2029. No CS3 funding has been committed in the current parliament. The local plan inspector examining soundness in late 2026 will therefore be asked to treat EWR as committed infrastructure in the absence of a DCO, committed funding, or a credible benefit-cost ratio. If the inspector accepts this, the local plan will have been made sound on a circular assumption — and EWRCo will cite the adopted local plan as independent evidence of housing demand at the DCO examination in 2027 to 2029. Each process will have borrowed its legitimacy from the other. ²²

- 5.13** No government body owns this circularity. MHCLG is responsible for the local plan timetable. DfT is responsible for EWR. The Planning Inspectorate examines both — the local plan and the DCO — but in separate processes with separate examining bodies and no formal mechanism to surface the cross-dependency. The result is that a decision which should be taken once, with full information, is instead laundered through two sequential processes, each of which can point to the other as authority. The food security cost — BMV farmland allocated, optioned, and removed from productive use — is incurred at the local plan stage, before either process has properly scrutinised the assumption on which both depend. ²²

Conclusion

- 6.1** The proposed EWR CS3 (Bedford to Cambridge), together with the housing, employment development, and Biodiversity Net Gain land required by EWRCo's business case, will permanently remove in excess of 6,800 hectares from food production on the CS3 corridor alone. This land is predominantly Grade 2 BMV farmland in the heart of England's most productive cereal-growing region. Its elevated position above the Fens makes it the strategic reserve for a future in which low-lying Grade 1 Fenland is progressively compromised by sea level rise. Once built upon and severed by a permanent railway, it cannot be recovered.
- 6.2** The Government has been told by military figures, food policy experts, and industry leaders that UK food security is a national security risk and that the country is sleepwalking into a crisis. It has published a Land Use Framework that explicitly requires the protection of BMV land. It has not applied that framework to the EWR route decision, and no government body owns the contradiction between the two.
- 6.3** EWRCo's counter-argument — that development generates greater economic value than farmland — fails on two levels. First, it is static: it values land at today's food prices in today's trading conditions, not across the 100-year operational life of the railway during which global food supply chains will face structural stress. Second, it assumes the housing will be built and occupied at the scale the business case requires. The evidence does not support this: 39,000 consented homes in South Cambridgeshire remain unbuilt; the real constraint on housing delivery is water, not rail access; and EWRCo's transport model shows only 3% of Cambourne residents would use the railway to reach Cambridge on a daily basis. A trade-off that permanently destroys in excess of 6,800 hectares of irreplaceable BMV farmland on CS3 alone — in exchange for housing growth that does not depend on the railway — is not a trade-off. It is an uncompensated and unjustifiable loss.

- 6.4** There are two ways the housing argument fails, and they cannot both be true at once. If the housing is genuinely EWR-dependent — if Tempsford and Cambourne would not be built without the railway — then EWRCo must own the full land take those developments require, and the food security cost must be assessed accordingly. If the housing is not EWR-dependent — if it would be built regardless, as the 39,000 unbuilt consents and the Cambridge Development Corporation's proposals for 150,000 to 250,000 further homes suggest — then it cannot be counted as a benefit of the railway, and the destruction of BMV farmland to enable it cannot be justified by reference to that housing. In either case, EWR is not needed to deliver the housing. In either case, the loss of the farmland is not justified by the housing numbers in the business case.
- 6.5** Cambridge Approaches calls on EWRCo to publish its agricultural land assessment and BMV tabulation as part of this consultation; to assess the full land take implied by its business case; to treat BMV loss as a material constraint on route selection; to ensure BNG does not fall on BMV land; to formally engage farming representatives; and to explain publicly how the southern route is consistent with the Government's Land Use Framework. Absent that explanation, the route should not proceed to DCO.

Endnotes

1. Fiona Harvey, "Britain 'sleepwalking into a food crisis' without urgent action, experts say", The Guardian, 28 May 2026. Quotes from Professor Tim Lang (City St George's University of London), General Richard Nugee (retd), and others. <https://www.theguardian.com/environment/2026/may/28/britain-sleepwalking-into-a-food-crisis-without-urgent-action-experts-say>
2. Joe Skirkowski et al., "Farmers warn food security can't be taken for granted", BBC News, 29 May 2026 (Royal Bath and West Show). Quotes from Jeremy Moody (Central Association of Agricultural Valuers) and Richard Clothier (Wyke Farms). Strait of Hormuz: 30% of world's fertiliser chemicals and 20% of oil supply affected. <https://www.bbc.co.uk/news/articles/cy024zvrld1o>
3. Cambridge Approaches, letter to Daniel Zeichner MP (Shadow Minister for Food, Farming and Fisheries), 18 April 2023: "just over 50% of all the wheat grown in England is grown within 50 miles of Cambridge." Reference: DEFRA/20230418EWRCALetterFarmingDZeichner.
4. Information provided by a local farmer whose land lies directly in the path of the proposed route. Corridor food production figure (200,000 people) derived from approximately 2,500 ha at typical Grade 2 cereal yields. Chapel Hill field: farmed by the same family for over 400 years; currently producing approximately 1,200 tonnes of oats per year, sufficient for approximately 30 million gluten-free breakfasts annually.
5. Rt Hon Heidi Alexander MP (Secretary of State for Transport), written statement to Parliament, 14 April 2026: EWR can support up to 100,000 new homes and is expected to boost the regional economy by £6.7 billion every year by 2050 (direct quotation). GOV.UK, <https://www.gov.uk/government/speeches/east-west-rails-plans-for-the-oxford-to-cambridge-growth-corridor>. See also Lord Hendy of Richmond Hill, letter to Richard Fuller MP, 17 March 2026 (ref MC-00063361). Land take calculation: Cambridge Approaches. Employment density assumption: 35 employees/ha (Cambridge-area science park typical).
6. HM Government, National Planning Policy Framework (NPPF), 2023, paragraph 180(b). Biodiversity Net Gain: mandatory 10% under the Environment Act 2021 and associated regulations; EWRCo has committed to 10% along the route.
7. Ministry of Agriculture, Fisheries and Food / Welsh Office Agriculture Department (ADAS), Agricultural Land Classification of England and Wales, HMSO. Fenland below sea level: Environment Agency Fens Flood Risk assessments; peat oxidation data.

8. Planning Inspectorate, Scoping Opinion for East West Rail (Case Reference TR040012), adopted 12 February 2025. Para 3.1.4 (Agriculture and Soils): tabulation of BMV land by grade temporarily and permanently lost, with maps; justification for use of BMV land; BMV land in the alternatives assessment. Para 2.2.5 (Cumulative Effects): cumulative effects scoped IN. Issued to statutory consultees only; not published. EWRCo 2026 NSC Brochure (April 2026): 153 pages; agriculture mentioned only under property impacts and farm business interviews. <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/TR040012>
9. HM Government, Land Use Framework, March 2026. EWRCo 2026 NSC Brochure, p.52–53: reference to working with DEFRA on national forest; no reference to food security or BMV land assessment. <https://www.gov.uk/government/publications/land-use-framework>
10. Greater Cambridge Development Corporation consultation, 2026. Development Corporation powers: capture of land value uplift for public benefit; compulsory purchase at existing use value.
11. Ortiz-Bobea et al., "Predicting changes in agricultural yields under climate change scenarios and their implications for global food security", Nature Scientific Reports, 2025; IPCC Special Report on Climate Change and Land, Chapter 5. <https://www.nature.com/articles/s41598-025-87047-y>
12. UN OCHA Sudan Humanitarian Update, September 2025; Sudan Doctors Union statement, January 2025.
13. Cambridge Approaches parish impact data analysis (parishes ewr impact data+WBH.xlsx). At 500m corridor width: Hardwick 20.4%, Harston 18.9%, Toft 16.8%, Haslingfield 14.9% of parish area impacted.
14. CPRE, "Building on our Food Security", July 2022: BMV land losses rose from 60 ha/year (2010) to over 6,000 ha/year (2022); East of England lost 3,200+ ha over 12 years; 60% of England's finest agricultural land at highest flood risk from climate change. IPCC Sixth Assessment Report: sea level rise 0.3–1.0m by 2100 (central); higher-end studies up to 4.7m. <https://www.cpre.org.uk/resources/building-on-our-food-security/>
15. Countryside Regeneration Trust (CRT), press release on Lark Rise Farm, Comberton, 2024; FarmingUK, "New rail link to 'devastate' wildlife habitat at Cambridgeshire farm", 2023. Quote from Tim Scott, tenant farmer at Lark Rise Farm. <https://www.thecrt.co.uk/news/new-rail-link-to-destroy-important-habitat-at-lark-rise-farm>
16. Cambridge Approaches, letter to Daniel Zeichner MP, 18 April 2023, paragraphs 1(a)–1(d).
17. Greg Smith MP, parliamentary adjournment debate, 3 March 2023 (Hansard), on HS2 and EWR construction impacts on farming in Buckinghamshire. Cited in Cambridge Approaches letter to Zeichner, 18 April 2023.
18. EWRCo, "Making Meaningful Connections" 2021 consultation: northern approach described as passing through areas "low-lying" or "in a flood plain" — cited as a reason against the northern approach.
19. Cambridge Approaches, Consultation Response: East West Rail Business Case Objection, v1.41, May 2026. BCR 0.3 confirmed by DfT Permanent Secretary to Transport Select Committee. 39,000 unbuilt consents in South Cambridgeshire: local authority planning data. Cambridge Development Corporation consultation, 2026: 150,000 to 250,000 further homes with no stated EWR dependency.
20. DfT Transport Analysis Guidance (TAG), Unit A2.3, para 4.1.7: the dependency test requires that development attributed to a transport scheme would not occur without it. EWRCo transport model: 3% of Cambourne working population forecast to use EWR to reach Cambridge (EWRCo demand model outputs, 2025). Cambridgeshire County Council transport assessment, October 2025: fewer than 1% of Cambourne trips go to Cambridge Biomedical Campus by any mode.
21. Environment Agency, formal response to EWRCo EIA Scoping Report, 2025: project area in zone of serious water stress; new consumptive groundwater licences unavailable; surface water abstraction restricted to high-flow periods. Water Resources East, Regional Plan, January 2025: lack of available water resources severely constraining growth in Eastern England; non-domestic water connections rationed to 20,000 litres per day. Supply schemes: Fens Reservoir (88 MI/d, target 2036), Lincolnshire Reservoir (169 MI/d, target 2040), Bacton desalination (60 MI/d, target 2040), Mablethorpe desalination (50 MI/d, target 2040) — all at or after EWR projected completion. Anglian Water Services, formal scoping response, para 6.7.11: five separate NSIPs required alongside EWR construction; additional water infrastructure not costed in EWRCo economic case.
22. Greater Cambridge Local Plan timetable: Government direction to adopt by end of 2026 (MHCLG correspondence with Greater Cambridge Shared Planning, 2025-26). EWR DCO submission: EWRCo

confirmed summer 2027 (2026 NSC documentation). DCO determination: Planning Inspectorate process typically 18-24 months; earliest approval therefore early 2029. CS3 funding: not allocated in current parliament (Spending Review 2025); EWR Outline Business Case not published before DCO submission; Full Business Case to be published only after consent granted. DfT Permanent Secretary evidence to Transport Select Committee, 2024: BCR has fallen below 0.3. NPPF paragraph 35: plans must be justified, effective (deliverable over the plan period) and consistent with national policy.

- 23.** EWRCo Technical Partner (MWJV), Environmental Assessment Factor Analysis for ACP7: Worksheet Parts 1 and 2 (Document nos. 133735-MWJ-Z0-XXX-RCD-EEN-000001[P01] and 000002[P01]), obtained by Cambridge Approaches under the Freedom of Information Act. ACP7 covers the Cambridge Approach section only. BMV figures: SATC Grade 1: 0 m²; Grade 2: 1,367,073 m² (136.7 ha); Grade 3a: 289,777 m² (29.0 ha); total 165.7 ha. NATC (ACP_C4) Grade 1: 12,434 m² (1.2 ha); Grade 2: 762,058 m² (76.2 ha); Grade 3a: 571,174 m² (57.1 ha); total 134.5 ha. Overall agriculture rating: NATC is Minor Improvement over SATC. BNG achievability: NATC is Major Improvement. No full-route BMV tabulation has been published.
- 24.** National Networks National Policy Statement (NPS NN), March 2024, para 5.168: "Applicants should take into account the economic and other benefits of the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification). Where significant development of agricultural land is demonstrated to be necessary, applicants should seek to use areas of poorer quality land in preference to that of a higher quality." Available: <https://assets.publishing.service.gov.uk/media/6650b0d10c8f88e868d33252/npsnn-web.pdf>. Note: the NPPF December 2024 footnote 65 requires the same preference but removed the explicit food production availability consideration present in prior versions.
- 25.** Natural England, formal response to EWR 2019 consultation (Soils and Agricultural Land): corridor land use is ALC grades 1 and 2 (BMV); required detailed ALC survey (one auger boring per hectare; pits to 1.2m depth); adverse soil impacts must be minimised per Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites. EWRCo Temporary Works maps (2026 NSC): main construction compounds at Chapel Hill and Charity Farm (Route Section 7, Comberton to Shelford); satellite compound; earthworks stockpile areas; on-site haul roads — all on agricultural land. Soil compaction persistence: peer-reviewed literature consistently documents yield depressions remaining measurable 10-15 years post-compaction; see e.g. Chamen et al. (2015), Soil Use and Management, 'Mitigating arable soil compaction: A review and analysis of available cost and benefit data.' Topsoil biological degradation in stockpiles: Smith et al. (2011), Soil Use and Management, 'Biological indicators of soil quality'; CIRIA guidance on soil management in construction.