

CONSULTATION RESPONSE

East West Rail: Pre-DCO Public Consultation

Objection to the Proposed Development (Phases 2 and 3)

Submitted by: Cambridge Approaches

Date: June 2026

EXECUTIVE SUMMARY

Cambridge Approaches objects to East West Rail Phases 2 and 3. The project fails on value for money, fails the dependency test, and causes disproportionate harm to communities. Phase 3 — the new-build alignment through South Cambridgeshire — should not be consented until a credible published economic case exists.

The business case fails

The last published benefit-cost ratio for EWR CS2/3 is 0.3 — firmly in DfT’s “poor value for money” category. DfT’s own Permanent Secretary confirmed to the Transport Select Committee that it has since fallen further. Capital costs in the published analysis are expressed in 2021 prices; construction inflation since then adds at least £1.5 billion not reflected in any published figure.

No updated appraisal has been published. The Outline Business Case will not be published before the DCO is submitted; the Full Business Case only after consent is granted. Consultees and the Examining Authority are being asked to approve a £6–7 billion project on the basis of an unpublished “strategic case” that has never been subject to public scrutiny.

The Government’s headline £6.7 billion GVA figure is, on its own admission, a local gross economic impact estimate — not a net addition to national output. It has not been adjusted for displacement of economic activity as WebTAG and the Green Book require, and cannot validly be weighed against the cost of a £6–7 billion project funded nationally by the taxpayer.

The Oxford–Cambridge strategic narrative does not survive contact with the data. EWRCo’s own forecasts show fewer than one through-passenger per train end-to-end. The published demand model is dominated by a 15-minute commute from Cambourne — a town already served by a dual carriageway. The project has never been appraised as the medium-distance commuter service the Rail Minister now describes.

The dependency test is not met

EWRCo’s economic case attributes billions of pounds of housing-led GVA to EWR. The “but for” test in TAG A2.3 para 4.1.7 requires that this development would not happen without the railway. The evidence shows it would.

EWRCo’s own transport model predicts only 3% of Cambourne’s working population would use EWR to reach Cambridge — at a capital cost of approximately £5 million per daily commuter, compared to £32,000 for the Elizabeth Line. Cambridgeshire County Council’s October 2025 transport assessment shows fewer than 1% of Cambourne trips

go to the Cambridge Biomedical Campus by any mode.

The planning system has already granted 39,000 unbuilt consents in South Cambridgeshire. A Cambridge Development Corporation consultation proposes 150,000–250,000 further homes with no stated EWR dependency. The real constraint on housing delivery is water: the Environment Agency has confirmed the project area is in serious water stress, and five major supply schemes are all targeted for completion at or after EWR's own opening date.

Disproportionate harm without justification

Phase 3 would introduce mainline rail at up to 100mph through rural South Cambridgeshire that currently has no railway, severing communities, taking Grade 2 agricultural land, and causing permanent noise and amenity harm to existing residents. A BCR of 0.3 — or lower — cannot justify irreversible harm of this scale. EWRCo's mitigation proposals remain at a level of generality that makes meaningful assessment impossible.

Phase 3 should be separated and deferred

Phase 2 (upgrading the existing Marston Vale line) is far less controversial and should not be conflated with the new-build Phase 3 alignment. Capital costs must be restated in current prices. EWR's dependency case cannot be assessed with any confidence while the Cambridge Mass Rapid Transit Strategic Outline Business Case, the Cambridge Development Corporation, five major water supply schemes, and the A428 dualling are all in motion — each with material implications for whether housing in Greater Cambridge depends on EWR. Proceeding to consent before these are resolved is to commit £6–7 billion of public money on a dependency case whose central assumptions remain unexamined and untested.

The Secretary of State should refuse development consent for Phase 3, or in the alternative commission a fully independent review of the economic case before any further consenting steps are taken.

Abbreviations

BCR	Benefit-Cost Ratio
CBC	Cambridge Biomedical Campus
CDC	Cambridge Development Corporation
CGC	Cambridge Growth Company
CPCA	Cambridgeshire and Peterborough Combined Authority
CPO	Compulsory Purchase Order
Phase 1 / Phase 2 / Phase 3	Connection Stages 1, 2 and 3 of the East West Rail project
DCO	Development Consent Order (under the Planning Act 2008)
DfT	Department for Transport
ETR	Economic and Technical Report (EWRCo, May 2023)
EWR	East West Rail
EWRCo	East West Railway Company
FBC	Full Business Case
MRT	Mass Rapid Transit
MRAO	Mullard Radio Astronomy Observatory
MVL	Marston Vale Line
NAO	National Audit Office
NIC	National Infrastructure Commission
NSC	Non-Statutory Consultation
OBC	Outline Business Case
OPI	Output Price Index (ONS construction series)
PI	Planning Inspectorate
SCDC	South Cambridgeshire District Council
SOBC	Strategic Outline Business Case
TAG / WebTAG	Transport Analysis Guidance (DfT's standard appraisal methodology)
TSC	Transport Select Committee

Key Terms and Definitions

1. Three analytical concepts — dependency, additionality and displacement — are central to the value-for-money assessment of EWR and recur throughout this response. They are related but distinct, and are frequently conflated in public debate. Precise definitions are set out below, with references to the relevant DfT Transport Analysis Guidance.
2. Dependency (TAG Unit A2.3, para 4.1.7)^[6] — The "but for" test applied to land-use change. Where development — including housing — is dependent on the transport scheme (i.e. it would not occur without the scheme), it may be included in the transport appraisal. Where development would occur without the scheme, it must be excluded. This is the foundational test for the housing-based economic case for EWR: only homes that genuinely would not be built without EWR may count as benefits of EWR.
3. Additionality (TAG Unit A2.1, paras 3.6.4–3.6.5)^[33] — A related but distinct concept. Even where development is transport-dependent, the economic activity it generates must be genuinely additional to produce a net national benefit. Activity that relocates existing workers from one employer to another — or draws labour from other sectors or industries within the same local economy — is not additional: it is redistribution within a closed labour market. TAG A2.1 states that the default assumption is 100% displacement, and that the onus rests on the scheme promoter to present credible evidence of additionality; in the absence of such evidence, the impacts are to be treated as displaced. Additionality formally encompasses deadweight, displacement and leakage (TAG A2.1, Appendix A). Additionality asks whether the economic output generated by EWR-enabled homes represents genuinely new production in the national economy, rather than activity that would have existed in some other form or location.
4. Displacement (TAG Unit A2.3, paras 2.2.5–2.2.6)^[34] — The national-level counterpart to additionality. TAG A2.3 states that displacement is key to any assessment of employment effects — "the extent to which local or sectoral employment changes are additional at the national level." The economy is assumed to operate at full employment in the long run, so that in the absence of labour supply effects, changes in demand lead to 100% displacement at the national level. Economic activity that relocates from Birmingham, Bristol or London to Cambridge is a redistribution within the UK economy, not a national gain. For EWR to generate a net national economic benefit, it must attract activity that would otherwise not exist within the UK. DfT has acknowledged adjusting the £6.7 billion GVA figure for the narrower concept of displacement of housing construction (i.e. where homes are built), but has not demonstrated a rigorous adjustment for the broader and more demanding test: displacement of economic output at a national level.
5. All three tests must be satisfied for land-use change benefits to be counted in an EWR appraisal. Failing any one means the attributed benefit is not a real national gain. Section 2 of this response demonstrates that all three tests fail for Cambourne — and, on the available published evidence, for the corridor more broadly.
6. The following phase numbering is used throughout this response. It is derived directly from EWRCo's published construction sequence and replaces EWRCo's earlier terminology of 'connection stages'. EWRCo's April 2026 consultation describes the scheme as built in "new delivery phases*" — replacing the previous connection stages," with an asterisk signalling that the phasing is subject to conditions not yet published.^[38]
7. **Phase 1** — Oxford to Milton Keynes Central, including the upgrade of the existing Bicester route. Already in test operation at the time of this consultation.

8. **Phase 2** — Improvements to the existing Marston Vale line between Bletchley and Bedford, including a new station at Stewartby to serve the planned Universal Resort. EWRCo proposes four trains per hour to Bedford by the mid-2030s. EWRCo's April 2026 consultation also identifies accelerated Cambridge improvements as part of this early phase: a new entrance to Cambridge station, and a new station at Cambridge East. EWRCo states that Cambridge East station "will be ready for other services — like Greater Anglia trains to Ipswich — before East West Rail fully launches." EWRCo's own description thus frames Cambridge East station primarily as a Greater Anglia asset, not as an EWR facility.
9. **Phase 3** — The entirely new-build alignment between Clapham Green (north of Bedford) and Hauxton Junction (south of Cambridge), with the full Oxford–Cambridge end-to-end service described by EWRCo as operational only "by the mid to late 2030s." Phase 3 is the section through South Cambridgeshire that causes the greatest harm to communities, carries the highest cost, and has the most contested business case. It is explicitly scheduled last. Unless otherwise stated, the term 'EWR' in this response refers to Phase 3: the new-build section that is the subject of the DCO application and the source of the harms Cambridge Approaches opposes.

1. The Business Case: A BCR Below 1

1.1 The last published BCR for CS2/3 is 0.3 — and has since worsened

10. The last formally published Level 2 BCR for CS2/3 is set out in Figure 6, Part Two of the National Audit Office's investigation into the East West Rail project.^[1] The NAO reports that EWRCo's Economic and Technical Report (May 2023)^[2] calculated a Level 2 BCR of 0.3 for connection stages 2 and 3, under high-growth assumptions only — no low-growth scenario was modelled for CS2/3. This places the project in “poor value for money” territory under WebTAG. A BCR below 1.0 means the quantifiable public costs exceed the quantifiable public benefits.
11. The NAO also notes that with wider economic impacts from land-use change included, the BCR rises to 0.6 — but explicitly records that “these wider benefits are excluded from DfT's standard benefit–cost ratio calculations.” The 0.6 figure therefore cannot be used as the primary measure of value for money; it is an experimental figure dependent on assumptions that are examined in Section 2 of this response.
12. The NAO confirmed that the 2023 recalculation — which revised the transport demand modelling to address identified weaknesses in the earlier approach — resulted in reductions to forecast demand, journey time savings and revenue. Dame Bernadette Kelly, then-Permanent Secretary at the Department for Transport (DfT), confirmed in oral evidence to the Transport Select Committee (Q194) that the BCR has fallen further still since the 2023 ETR:
13. *“For technical reasons we now think it is somewhat lower for CS2 and 3.”*
Transport Select Committee, Oral Evidence: East West Railway, 6 March 2024, Q 194. Dame Bernadette Kelly, Permanent Secretary, Department for Transport. [3]
14. No updated appraisal has been published. The promoter's continued refusal to release the Outline Business Case means consultees cannot assess the current position. We have no reason to believe the BCR has improved from the published figure of 0.3. On the contrary, the evidence on cost inflation set out in Section 1.5 suggests it has worsened materially.

2023 Level 2 BCR for CS2/3 (high-growth only): 0.3 (EWRCo ETR, per NAO Figure 6)

2023 BCR with wider land-use benefits: 0.6 (excluded from DfT standard methodology)

Current BCR: Below 0.3 per DfT's then-Permanent Secretary — unpublished

WebTAG “poor” value for money threshold: BCR below 1.0

WebTAG “low” value for money threshold: BCR 1.0–1.5

1.2 Dame Bernadette Kelly's evidence: 56,000 houses are needed for a BCR of 1.5

15. When pressed by Sara Britcliffe MP in the Transport Select Committee (Q206) on the minimum level of new housing development that would be required to make the project justifiable, Dame Bernadette Kelly replied:
16. *“In my 2021 assessment, looking at it through a purely technical lens, in the strategic case we worked out that a £4 billion increase in benefits would lead to a BCR of 1.5 — which means you move the BCR from poor to respectable value for money. That was equivalent to about 56,000 houses. That is what we*

assessed at the time."

Transport Select Committee, Oral Evidence: East West Railway, 6 March 2024, Q 206. Dame Bernadette Kelly, Permanent Secretary, Department for Transport. [4]

17. This is an extraordinary concession. DfT's own analysis shows that the project requires a transformational housing uplift of at least 56,000 homes — genuinely additional homes, built in locations specifically enabled by EWR — before it reaches the threshold of "respectable" value for money. Even then, a BCR of 1.5 is only the lowest level at which a project might be recommended by HM Treasury.
18. The 56,000-home figure must also be treated with care. It requires genuinely additional homes — homes that would not be built without EWR — to be built and generating economic activity within the appraisal period. As Section 2 of this response demonstrates, the evidence from South Cambridgeshire shows that the real constraint on housebuilding is developer appetite and market absorption, not transport access. Homes with planning permission and existing transport connections are not being built at anything approaching the rate the economic case assumes. The 56,000 homes are a necessary condition that has not been shown to be achievable.
19. Even accepting the 56,000-home threshold at face value, there is a prior question: whether EWR would materially contribute to unlocking that housebuilding at all. Section 2 of this response demonstrates, on dependency and additionality grounds, that it would not. The homes planned along the corridor are not dependent on EWR; the real constraints on delivery are developer appetite, market absorption capacity, and statutory infrastructure deficits in water and sewerage — none of which a railway can address. Satisfying Dame Kelly's 56,000-home threshold therefore requires not only that the homes be built, but that they be built as a direct consequence of EWR. The evidence in this response demonstrates that neither condition is met.

1.3 Dame Bernadette Kelly's admission on Level 3 methodology

20. In Q196 of the same session, Dame Kelly made a further significant admission:
21. *"One of the things I am certainly challenging my analysts on... is that we need to find ways of better measuring transformational benefits."*

Transport Select Committee, Oral Evidence: East West Railway, 6 March 2024, Q 196. Dame Bernadette Kelly, Permanent Secretary, Department for Transport. [5]
22. This confirms that the Level 3 (transformational) methodology used to generate the optimistic BCR scenarios is not yet fit for purpose even in DfT's own assessment. The Department is using an incomplete methodology to justify a project that, on conventional appraisal, fails the value-for-money test. This is not a satisfactory basis for granting development consent.

1.4 The existing BCR already incorporates agglomeration and wider economic benefits

23. The project promoter has emphasised "wider economic benefits" and "transformational" effects as if these are additional to an already-adequate BCR. They are not. The standard WebTAG appraisal (Levels 1 and 2) already includes agglomeration effects, labour market impacts, and business productivity gains attributable to improved transport connectivity. These are already embedded in the 2023 Level 2 BCR of 0.3 reported in the NAO investigation. The promoter's "wider benefits" case is not a supplement to an otherwise-acceptable BCR — it is an attempt to rescue a BCR that has already failed the value-for-money test even after agglomeration is included.
24. The Level 3 transformational case — which includes housing-led growth, inward investment, and corridor-wide economic restructuring — is inherently speculative, has

no established methodology accepted by HM Treasury, and is explicitly treated as additional to (rather than replacing) the conventional appraisal. Given that the conventional BCR is already below 1, the promoter is in effect asking the decision-maker to approve a loss-making project on the basis of unquantified aspirations.

25. HM Treasury's 2026 Green Book sets out explicit requirements for proposals that claim to bring about transformational change.^[35] Para 4.28 defines transformational change as "a radical, permanent and qualitative change in a particular subject, such that the subject has very different properties and behaves in a different way." Para 4.29 states that "transformational change is rarely brought about by individual projects or programmes" — it typically requires a portfolio of programmes collectively focused on transformational objectives, whose social value "is often greater than the sum of its parts." Para 4.30 then requires that "if practitioners anticipate that their proposal will bring about transformational change, then they must transparently explain these assumptions and support them with evidence and analysis." EWRCo has done none of this. The Transformational Scenario is described in EWRCo's own ETR as an uncalibrated upper bound incapable of producing an accurate demand forecast. No published document sets out the feedback mechanisms, tipping points, or self-reinforcing dynamics that the Green Book requires to be demonstrated. Para 4.29 is particularly telling: if transformational change requires a portfolio of interventions working collectively rather than a single project, then EWR cannot, on HM Treasury's own framework, bear the transformational economic case unaided — yet that is precisely what EWRCo asks the Examining Authority to accept.

1.5 The capital cost estimate is expressed in out-of-date prices and is materially understated

26. The BCR is a ratio of benefits to costs. The costs in the denominator are drawn from EWRCo's Economic and Technical Report (ETR), published in May 2023.^[2] ETR Appendix 8 states explicitly that capital costs are expressed in Q2 2021 prices and that subsequent inflation is not included. The figures repeated in EWRCo's 2024 Non-Statutory Consultation materials use the same baseline. DfT has published no updated appraisal in current prices.
27. This matters because infrastructure construction cost inflation was severe in the period immediately after Q2 2021 — a fact acknowledged in the ETR itself, which noted uncertainty about whether post-COVID supply chain price rises would persist. They have persisted. According to ONS Construction Output Price Indices:^[16]
- Q2 2021 to December 2023: construction output prices rose by approximately 20%
 - December 2023 to September 2024: a further 3% increase
 - September 2024 to September 2025: a further 2.7% (ONS all-work output price index, latest confirmed data)
 - Cumulative Q2 2021 to September 2025: approximately 26% — and rising
28. Energy costs represent a further and accelerating pressure. Rail construction is highly energy-intensive: fuel for plant and machinery, haulage of materials, asphalt and petrochemical-based products, and energy-dependent steel and concrete manufacturing all feed directly into project costs. Since Russia's invasion of Ukraine, energy prices have remained structurally elevated. The current oil price spike has compounded this: crude oil stood approximately 77% higher year-on-year in May 2026,^[17] UK diesel pump prices have risen by over 36% above pre-conflict levels, and the March 2026 construction PMI recorded an "unusually large jump in cost inflation pressure," with firms specifically citing energy costs and supply chain disruption.^[18] Energy costs are currently rising faster than wages — an unusual position that represents an additional upward cost pressure not captured in the standard

construction output price indices. None of this is reflected in EWRCo's Q2 2021 price base or in any subsequently published appraisal.

29. On EWRCo's own figures, the capital cost of CS2/3 is in the range of £6–7 billion. A 26% cost uplift from Q2 2021 to September 2025 represents approximately £1.5–1.8 billion of additional unacknowledged cost — before the current energy-driven inflation is factored in. On a project with a BCR of approximately 0.3, any further increase in the cost denominator pushes the ratio lower still. We request that DfT confirm the price base used in any current appraisal and publish cost estimates in Q1 2026 prices before this application proceeds further.

ETR / 2024 NSC price base: Q2 2021 (explicit in ETR Appendix 8)
Construction output price inflation Q2 2021 → Sep 2025: ~26% (ONS)
Crude oil price change year-on-year (May 2026): +77% (Fortune / Trading Economics)
UK diesel pump price vs pre-conflict level: +36%
Implied unacknowledged cost uplift on £6–7bn project: £1.5–1.8 billion+

1.6 EWR is not justified as an Oxford–Cambridge service, and has never been appraised as an intermediate-distance one

30. The headline strategic case for EWR rests on the narrative of connecting Oxford and Cambridge — two world-class universities and innovation clusters separated by 80 miles. This narrative does not survive contact with the demand data. The 2019 published forecast for Oxford–Cambridge through-passengers was less than one passenger per train. A railway promoted as the spine of the Arc cannot be justified by a flow that produces fewer than one traveller per service end-to-end.
31. The Rail Minister has himself characterised the project. Lord Henty of Richmond Hill, in an interview with Rail Magazine in February 2025, described EWR as^[27]
32. *"a quite intensive medium-length passenger service to significantly grow the economy, build houses, and create jobs between Oxford and Cambridge."*
33. Lord Henty also confirmed: "nobody designed East West Rail to be a major route for freight." These characterisations are significant in two respects. First, they confirm that the project is being framed as a medium-distance commuter and economic stimulus service — not as the Oxford–Cambridge connectivity solution that the wider strategic narrative has implied. Second, they confirm that the freight specification for Phase 3, which has generated considerable cost and controversy through gradient and loading requirements, reflects a DfT brief rather than a demonstrated passenger or commercial freight case.
34. EWRCo has consistently presented EWR to the public as an Oxford–Cambridge project. Yet EWRCo's own Economic and Technical Report — the only substantive published economic analysis — is centred primarily on short-distance commuting flows: its demand modelling is dominated by Cambourne (15 minutes to Cambridge) and by the Tempsford proposed station in Bedfordshire, not by Oxford–Cambridge end-to-end connectivity. The intermediate-distance flows — Bedford–Cambridge, Bletchley–Cambridge, Milton Keynes–Cambridge — that might plausibly characterise EWR as a medium-distance commuter service have never been the subject of a separate published appraisal. The headline Oxford–Cambridge narrative has driven the strategic framing; the underlying published modelling is a 15-minute commuter service. These are fundamentally different propositions, and no published document

reconciles them.

35. The current Rail Minister has reframed EWR as an "intermediate distance service" — implying that the real demand case rests on flows such as Bedford–Cambridge, Bletchley–Cambridge or Milton Keynes–Cambridge, rather than on the Oxford–Cambridge narrative. That reframing may be a more honest description of what EWR actually serves. But no quantitative appraisal has ever been published on that basis. The BCR, the demand forecasts, and the strategic case documents have all been presented against the Oxford–Cambridge framing. If the project is now to be justified as an intermediate-distance service, that case needs to be made from first principles, with a published appraisal, before any consent is granted.
36. EWRCo's own May 2023 trip-end modelling (ETR Appendix 4, Table 4.1) inadvertently confirms the weakness of the long-distance case. The dominant contributor to the Cambridge demand model — the station generating the most projected rail commuters — is Cambourne, at a journey time of 15 minutes. Not Bedford (36 minutes). Not Milton Keynes (60 minutes). Certainly not Oxford. The model that is meant to justify a £6–7 billion new railway is, in practice, a model of a 15-minute local commute from a town that already has a dual carriageway and bus connections to Cambridge. The intermediate-distance and long-distance demand that might justify the cost of Phase 3 is not visible in EWRCo's own published analysis.

1.7 The "strategic case" does not displace the value-for-money test

37. DfT witnesses told the Transport Select Committee that the "strategic case" for EWR is strong. This claim requires careful examination. In the HM Treasury Green Book framework and in WebTAG, the strategic case is one of five cases in a business case — alongside the economic, financial, commercial and management cases. A strong strategic case can establish that a problem exists and that a transport intervention is a plausible response. It does not, and cannot, override a negative economic case. The Green Book is explicit that public investment must demonstrate value for money. A BCR of 0.3 is not rescued by a narrative about connectivity, innovation corridors, or levelling up.
38. DfT has separately cited a figure of £6.7 billion in Gross Value Added (GVA) associated with EWR, linked to approximately 100,000 homes across the whole corridor. This figure has not been published with its methodology. It is described as having been "assured" by HM Treasury, but the basis of that assurance is not in the public domain. Consultees, the Examining Authority, and the Secretary of State are being asked to weigh this figure against the certain, quantified costs of a £6–7 billion infrastructure project — without being able to scrutinise how the figure was derived.
39. The £6.7 billion GVA figure is, in any event, subject to exactly the same dependency and additionality tests under TAG A2.3 as the Level 2 BCR. GVA generated by homes that would be built without EWR cannot be attributed to EWR. GVA from homes that will not be built within the appraisal period — because of developer appetite, market absorption limits, or water and sewerage constraints — does not materialise. The size of the headline figure does not change the analytical requirement: the benefits must be genuinely additional and genuinely dependent. Section 2 of this response demonstrates that these tests are not met.
40. The Government's own published statements on the £6.7 billion figure contain a specific internal contradiction. In correspondence with Cambridge Approaches dated 28 May 2025, Lord Hendy of Richmond Hill stated that the figure "is adjusted downward to take into account the likely displacement of housing construction from elsewhere and the uncertainty of transport dependency."^[20] In the same letter,

however, he immediately qualified this: "It remains important to clarify that the £6.7 billion GVA figure is an estimate of impact to the local economy and therefore is not an indication of the impact of EWR on economic output at the national level."

41. These two statements cannot be reconciled. In WebTAG and Green Book appraisal, displacement is a national-level concept: it asks whether economic activity is genuinely new to the national economy, or merely relocated from one region to another. A properly displacement-adjusted benefit figure would measure net addition to national economic output. Lord Hendy's admission that the £6.7 billion is a local economy estimate — not a national figure — reveals that displacement of economic activity has not in fact been properly accounted for. DfT adjusted for "displacement of housing construction" (a narrower concept concerned with where homes are built) rather than displacement of economic output (whether the activity is new to the UK as a whole). Lord Hendy's language — "likely displacement" and "uncertainty of transport dependency" — confirms that even those limited adjustments were qualitative, not rigorous. The £6.7 billion GVA figure is therefore a local gross economic impact estimate, not a net addition to national economic output, and cannot validly be set against the national infrastructure cost of a £6–7 billion project without a displacement adjustment that has never been published.
42. We note with concern that the Cambridge component of the £6.7 billion GVA figure appears consistent with the demand and housing numbers in EWRCo's May 2023 ETR. ETR Section 4.3 states that EWR would support approximately 28,200 jobs in Cambridge across the categories of workers newly accessible to Cambridge employers (ETR categories B, C and D), derived from approximately 115,700 homes in EWRCo's principal scenario corridor-wide.^[23] At the Shelford Rugby Club consultation meeting on 30 April 2026, back-calculations using EWRCo's own published parameters were applied to the corridor-wide 100,000-home scenario: approximately 100,000 homes × 1.2 jobs per home × approximately £56,000 GVA per job ≈ £6.7 billion GVA.^[19] These figures are internally consistent: EWRCo's Cambridge job-to-home ratio, applied to the corridor-wide home count in the published GVA headline, reproduces the £6.7 billion figure. This strongly suggests the GVA headline derives from the same Transformational Scenario parameters that underpin ETR Appendix 4.
43. If that derivation is correct, the GVA figure is subject to exactly the same objections as the Transformational Scenario demand model: ETR Appendix 4 explicitly describes its parameters as "plausible but very aspirational," representing "around the limits of what is observed today," and states that the resulting model "cannot calculate an accurate demand forecast." The Transformational Scenario was never intended as the basis for a published GVA claim: it was an uncalibrated upper-bound narrative. If the £6.7 billion figure rests on parameters that EWRCo itself characterises as aspirational and incapable of producing an accurate forecast, the figure is not a reliable input to any decision-making process.
44. Granting development consent for Phase 3 on the basis of a GVA figure whose methodology is undisclosed, whose underlying parameters are admittedly not evidence-based, and which is subject to the same dependency test failures documented throughout this response, would be procedurally and analytically indefensible. The Examining Authority should require DfT to publish the full methodology for the £6.7 billion figure — including which scenario parameters were used, how the dependency test was applied, and what assumptions were made about build-out rates — before any weight is placed on it in the decision.
45. We recognise that the Examining Authority's formal remit does not extend to auditing DfT's or HM Treasury's value-for-money assessment. However, the effectiveness of EWR as a transport solution is directly relevant to the planning merits and the public

interest balance that the Examining Authority must conduct. This matters because an ineffective transport scheme generates harms that the DCO process cannot ignore. If EWR is built, new communities are established along the route on the premise that it will serve them, and EWR then fails to attract sufficient demand — as the evidence in this response strongly suggests it will — one of three outcomes follows. Either the new developments themselves fail, leaving residents stranded in communities whose planned transport connection does not function as promised, depressing property values and imposing social costs on those communities. Or those residents travel by car instead, generating precisely the road congestion and carbon emissions that the scheme was intended to reduce, and leaving the strategic transport problem unsolved. Or a separate mass transit scheme — busway, light rail, or otherwise — has to be built at additional public expense to provide the connectivity that EWR was meant to deliver. In each case, the public bears the cost twice: once for a railway that does not work, and again for the intervention needed to address the consequences. The Examining Authority cannot responsibly recommend consent without satisfying itself that EWR would actually function as a transport solution. The evidence in this response demonstrates that on its own promoter's figures, it would not.

1.8 Business case transparency: seven years of consultation with no published economic analysis

46. EWR has been through a series of non-statutory consultations since 2019 — a period of approximately seven years. In that time, the only substantive published economic analysis is the May 2023 Economic and Technical Report. That document has since been set aside. At a meeting with parishes and the MP for South Cambridgeshire on 10 December 2025, Tom Wilson (Head of Economic Development, EWRCo) described the business case as "in development" and confirmed EWRCo had moved on from the ETR approach. David Bray, Programme Director of EWRCo, stated at the same meeting: "the strategic case is driving the railway rather than the BCR."^[23]
47. The Outline Business Case (OBC) has not been published and no commitment to publish it has been made. In a letter of 17 March 2026 to Richard Fuller MP, Lord Hendy of Richmond Hill confirmed: "A Full Business Case will be put forward once planning consent is secured" — meaning the FBC will be produced only after the DCO decision is made.^[21] He added that it is "envisaged" the FBC "will be published once it is completed." "Envisage" is not a commitment; and a document published after all decisions have been made cannot inform those decisions.
48. The Strategic Outline Business Case (SOBC), dated 3 October 2019, has been confirmed to exist but has been withheld. When Cambridge Approaches requested it under the Environmental Information Regulations, DfT's own internal reviewer acknowledged "a clear public interest in... disclosure" but concluded the balance favoured withholding on the grounds that publication would be "distracting" for officials during the consultation period.^[22] Cambridge Approaches has appealed that decision to the Information Commissioner; the review is pending.
49. The phrase "strategic case" is used in two distinct and easily confused senses in public statements about EWR. In the formal HM Treasury Green Book framework, the Strategic Case is one of five components of a business case — addressing policy rationale, objectives, and options appraisal. This formal Strategic Case forms part of the unpublished SOBC. Separately, EWRCo and ministers use "strategic case" informally to mean the broader political justification for overriding the BCR — the claim that EWR is nationally important regardless of what the numbers show. Neither is available for public scrutiny: the formal one is in a document DfT refuses to publish; the informal one consists of unverified assertions with no disclosed methodology.

50. The Treasury Permanent Secretary's evidence to the Public Accounts Committee on 26 June 2025 is instructive. James Bowler CB told the Committee that looking at a transport project and a housing project separately, "neither of which in isolation will amount to the thing you are trying to do," was the wrong approach; that the right response was integrated appraisal across transport, housing and growth; and that there should be "no arbitrary thresholds." He continued:
51. *"Is that a railway project with East West Rail? Is it a housing project with Cambridge, Oxford and a potential new town? Is it a business project that is generating growth, labs and all of that? The answer is that it is all those things."*
- James Bowler CB, Permanent Secretary, HM Treasury. Public Accounts Committee, Oral Evidence: Governance and decision making on major projects (HC 642), 26 June 2025, Q39. [28]*
52. Three points follow directly. First, Mr Bowler is describing an integrated appraisal that assesses transport, housing and growth together — but this is precisely what a Level 3 BCR attempts, and it is not new. DfT's own methodology at Level 3 already endeavours to combine transport benefits with housing-led growth and labour market effects. The Level 3 framework has been applied to EWR; the result is still a BCR below conventional thresholds. What Bowler's evidence reveals is that even the most expansive appraisal framework available has not produced an acceptable result — and that the response is therefore to argue for abandoning the threshold rather than improving the project. "No arbitrary thresholds" is not a technical observation: it is an argument for setting aside the value-for-money test altogether because EWR fails it.
53. A further and related methodological problem concerns the attribution of GVA to transport mode. The economic case for EWR attributes substantial GVA to the workers whose commuting journeys the railway would enable. But the productive output of a Cambridge research scientist or AstraZeneca employee derives primarily from their education, skills, institutional affiliation, the research infrastructure of their employer, collaborative networks, and the Cambridge innovation ecosystem. Transport is one of several factors enabling their physical presence. Attributing 100% of that worker's GVA to the specific railway they happen to commute on is methodologically unjustified. The marginal GVA contribution specifically attributable to EWR — over and above what would be generated by the same worker using an alternative mode (car, bus, a different rail route, or, in due course, mass transit) — has never been calculated or published. This is not a minor technical quibble: it is the core attribution on which the entire Level 3 economic case rests, and it has never been demonstrated.
54. Second, the integrated appraisal Mr Bowler describes — assessing transport, housing and growth together — has not been published as a document available for scrutiny. If it exists, it must be disclosed before consent is sought; if it does not, the case for abandoning BCR thresholds rests on nothing that can be verified or challenged. Third, the governance mechanism he points to — Lord Vallance chairing a ministerial oversight board for the Oxford-Cambridge approach — is a political structure, not a published analysis. A board is not a business case.
55. The consequence is that the public and the Examining Authority are being asked to assess a project costing £6–7 billion of public money with access to: an ETR from 2023 that EWRCO has moved away from; a £6.7 billion GVA figure described as "Treasury Assured" with no published methodology; and ministerial assurances. The question that the Examining Authority must press is not whether a strategic case exists, but whether it can be verified — and on current evidence, it cannot. The Green Book framework exists precisely to prevent political will substituting for evidence. The sequence of events here — route decision before the ETR was published; ETR abandoned after it produced a failing BCR; FBC deferred until post-consent —

represents a systematic inversion of that framework.

56. We ask the Examining Authority to designate the adequacy and transparency of the business case as a principal issue in the Initial Assessment of Principal Issues, and to request that DfT publish the full OBC — with capital costs expressed in current prices and with the full methodology for the £6.7 billion GVA figure — before the examination commences.

1.9 The life sciences and CBC justification has materially weakened since 2021

57. A significant element of the strategic narrative for EWR — and in particular for the southern route into Cambridge — has rested on connectivity to the Cambridge Biomedical Campus (CBC). The life sciences investment environment that was assumed when the strategic case was framed in 2021 has since materially deteriorated.
58. AstraZeneca, the anchor tenant of the CBC, halted a planned £200 million expansion of its Cambridge research facilities in September 2025, affecting approximately 1,000 planned jobs. Earlier in 2025 it also withdrew from a £450 million vaccine site expansion elsewhere in the UK.^[24] On 29 April 2026, AstraZeneca announced a £300 million UK investment, comprising completion of the Rosalind Franklin Building on the CBC and a new laboratory in Macclesfield.^{[29][36]} The Cambridge element is the resumption of the previously paused £200 million expansion — reinstatement, not a new commitment. The genuinely new element is the Macclesfield laboratory, which is not in Cambridge and is unrelated to EWR. Speaking in the House of Commons, Prime Minister Sir Keir Starmer stated that the "significant new investment by AstraZeneca" was "made possible by the pharmaceutical arrangement we have struck with the US." AstraZeneca CEO Pascal Soriot, on a call with reporters, confirmed the same attribution: the company "would like to thank the British government for their efforts to improve access for patients." The reversal is explicitly attributed by both AstraZeneca and the government to the UK-US pharmaceutical pricing deal, not to any change in Cambridge's transport connectivity. No commitment to further Cambridge investment conditional on EWR proceeding has been made by AstraZeneca or any other investor.
59. The UK life sciences sector more broadly has seen a significant decline in foreign direct investment. UK life sciences FDI fell 58% between 2017 and 2023, from £1.9 billion to £795 million, and the UK's ranking among comparator nations fell from 2nd to 7th. UK pharmaceutical R&D investment fell in absolute terms in 2023 by nearly £100 million. In 2025, pharma companies paused or withdrew nearly £2 billion in planned UK investments. Sanofi's UK Country Lead described the UK as "increasingly viewed as 'uninvestable' in global boardrooms."^{[24][25]}
60. The CBC is not the most significant biotech cluster in the sub-region. The Wellcome Sanger Institute and EMBL-EBI at the Genome Campus, Hinxton, represent a world-class concentration of genomics and computational biology — and are not served by EWR on any proposed alignment. The CBC is also a substantially built-out campus. By the time Phase 3 is operational in the late 2030s, its planned development will have been largely completed regardless of EWR.
61. Moreover, the strategic case for EWR conflates general life sciences investment with the specific character of the CBC. Greater Cambridge planning policy has consistently sought to reserve the CBC for uses that specifically need to be located there. The planning authority's own Development Strategy Topic Paper, prepared for the Greater Cambridge Local Plan First Proposals consultation, stated: "After its original Green

Belt release, successive policies have sought to reserve the campus for uses that need to be located there. It is proposed that this approach continues.”^[40] Private sector pharmaceutical companies choose locations on the basis of talent availability, regulatory conditions, and pricing arrangements — as the AstraZeneca episode conclusively demonstrates. Their presence at the CBC is commercially welcome but not site-dependent.

62. The most significant and genuinely site-dependent demand for land at the CBC is the rebuild of Addenbrooke’s acute hospital facilities. Land has been reserved at the CBC for this purpose since 2010. Cambridge University Hospitals NHS Foundation Trust has confirmed that over 70% of its acute estate is in poor or bad condition, that its emergency department was built for a quarter of the patients it now serves, and that its care model “is not sustainable from a staffing, funding or space perspective in the future.”^[41] The estimated cost of this rebuild is £2.3 billion. It is the physical proximity of world-class clinical facilities to research laboratories and the University — not transport connectivity from new housing in Cambourne — that generates the innovation premium associated with the CBC. EWRCo’s strategic narrative has elevated a commercially contingent and location-discretionary use of the CBC over its primary and irreplaceable function.
63. The UK-US Arrangement on Pharmaceutical Pricing, published 2 April 2026, represents a partial government acknowledgement that the investment conditions that underpinned the EWR life sciences narrative have failed.^[26] However, the arrangement is not legally binding, is terminable on six months’ written notice, applies prospectively only to medicines launched after April 2026, and defers the central structural question — VPAG clawback rate reform — to a working group with a 2029 deadline. No pharma company has announced a resumption of paused UK investment in consequence. The arrangement acknowledges the problem; it does not resolve it.
64. No private sector investor has committed investment conditional on EWR proceeding. EWRCo’s efforts to attract private sector co-funding have produced nothing in the public domain. The government is simultaneously promoting EWR as a life sciences and economic growth enabler while the sector’s FDI has halved and anchor investors have paused expansion. These positions are irreconcilable.

2. The Dependency Test: TAG A2.3 para 4.1.7

2.1 The legal and policy framework

65. DfT's Transport Analysis Guidance, Unit A2.3 ("Wider Impacts"), paragraph 4.1.7,^[6] sets out the critical dependency test for including land-use change benefits in a transport appraisal:
66. *"Where land use change is dependent on the transport scheme — that is, it would not occur without the transport scheme — the land use change and any associated economic activity can be included in the appraisal of the transport scheme."*
67. The corollary is equally explicit: where land-use change — including housing development — would occur anyway, with or without the transport scheme, the benefits of that development cannot be attributed to the transport scheme. They cannot lawfully form part of the economic justification.
68. This is not a technicality. It is the fundamental safeguard against circular reasoning in transport appraisal: you cannot justify a railway by pointing to housing that would be built regardless of whether the railway existed.
69. Three related but distinct concepts govern whether economic benefits from land-use change may legitimately be attributed to a transport scheme. Dependency (the TAG A2.3 test) asks whether development would occur at all without the scheme — the "but for" test. Additionality asks whether the economic activity represents genuinely new output, or whether it is activity relocated from elsewhere within the local area (workers moving between employers, rather than new jobs being created in net terms). Displacement asks whether the benefits represent activity new to the national economy, or activity relocated from another part of the country — from Bristol, Manchester, or London to Cambridge. All three tests must be satisfied for land-use change benefits to be included in the appraisal; failing any one means the attributed benefit is not a real national gain. For Cambourne, all three tests fail: the development is not transport-dependent; the labour market effects largely represent relocation of existing workers rather than net new job creation; and economic activity drawn to the Cambridge corridor from elsewhere in the UK is a redistribution, not a national benefit.

2.2 The dependency test in practice: why rail usage is the correct measure

70. TAG A2.3 para 4.1.7 establishes whether development would occur without the transport scheme — the housing-level "but for" test. Passing this test is a necessary condition for including land-use benefits in the appraisal. It is not sufficient to establish that the GVA of workers in those homes is attributable to EWR. A resident of an EWR-dependent home who commutes to a new CBC job by car does not generate any economic benefit attributable to EWR. Housing dependency and economic benefit attribution are two distinct tests. Conflating them is the central methodological error in EWRCo's economic case.
71. EWRCo confirmed at the Non-Statutory Consultation meeting at Shelford Rugby Club on 30 April 2026 that no adjustment is made for rail mode share when attributing GVA to EWR.^[19] This means the BCR is arithmetically identical whether 10% or 100% of Cambourne residents use the railway. A transport appraisal that is indifferent to whether anyone uses the transport is not a transport appraisal — it is a land-use planning exercise with a railway attached.
72. No published mechanism exists for determining whether a specific job is EWR-dependent. Under EWRCo's methodology, jobs are attributed to EWR by inheritance

from the housing dependency determination: if the LPA decides the home is EWR-dependent, all employment generated by the occupants is credited to EWR — regardless of commuting behaviour, whether the job is genuinely new, or whether the worker could have reached it by other means. A logically coherent test requires all three conditions simultaneously: the worker uses EWR; the job is genuinely additional; and the job was inaccessible by other transport. EWRCO's methodology satisfies none of these conditions explicitly.

73. Cambridge Approaches has reconstructed ETR Table 4.1 from EWRCO's published data by reverse-engineering the formula used to derive the demand figures. Applied to the existing population only — with no new housing development — the model produces approximately 500 daily Cambridge commuter rail trips. These represent pure mode-switch: existing residents transferring from car or bus to EWR. Their additionality is zero — they are not accessing new jobs, merely changing transport mode. The net economic benefit of EWR for the existing population of the corridor, on EWRCO's own methodology correctly applied, is nil. The remaining 1,590 trips in EWRCO's Conventional Scenario total of 2,090 are entirely dependent on new housing being built, occupied, and residents choosing EWR over car, busway, or mass transit. After adjusting for additionality — removing workers filling existing rather than genuinely new jobs — approximately 1,500 people per day represent the outer bound of EWR's economic benefit. That is who this railway is built for. The existing communities of South Cambridgeshire — those who bear the planning harm, the compulsory purchase, the decade of construction disruption — are not the beneficiaries. They are the funders and the victims. The underlying spreadsheet, which replicates EWRCO's ETR Table 4.1 formula and applies the dependency and additionality adjustments described above, is available to the Examining Authority on request from Cambridge Approaches.
74. At a capital cost of approximately £8 billion and 1,500 additionality-adjusted daily commuters to new Cambridge jobs, the cost is approximately £5.3 million per daily commuter to a new job. On the raw ETR Conventional Scenario figure of 2,090, it is approximately £3.8 million. For comparison: the Elizabeth Line cost approximately £19 billion and carries over 600,000 daily passengers — approximately £32,000 per daily passenger. The Borders Railway into Edinburgh cost £294 million for approximately 3,000 daily passengers — approximately £100,000 per daily passenger. EWR is not a minor outlier against these benchmarks. It is two orders of magnitude above the Borders Railway — a modest regional scheme into a city of 500,000.
75. When presented with this analysis, DfT's Senior Responsible Owner for EWR stated that EWR cannot be compared with the Elizabeth Line. Cambridge Approaches disagrees. Comparison across capital programmes is precisely what financial assessment exists to do — it is what money is for. The fact that EWR cannot withstand comparison to established benchmarks is not a reason to prohibit the comparison; it is the finding. In a written response to Cambridge Approaches' critique of the ETR, dated 5 November 2023, DfT distinguished between "factual statements" in that critique and "judgments about the future which by definition may vary and be uncertain."^[32] The written response does not rebut the factual statements — including the cost-per-commuter analysis — and offers only this in response: "The creation of East West Rail would allow a range of opportunities over the next decades as Cambridge and its surrounding areas develop. Not all of these are in current plans but they may become so as the certainty of the railway increases." Stephen Kelly, Planning Director of Greater Cambridge Shared Planning, offered the same response when presented with the same analysis at a meeting with the South Cambridgeshire Rail Group in Haslingfield on 15 July 2025.
76. This "things would grow up around the railway" argument faces a structural constraint that planning ambition cannot overcome: the gravity model for predicting rail demand.

Rail passenger numbers are driven by the economic mass — population and employment — of the cities at each end of the route. Cambridge has a population of approximately 130,000; Oxford approximately 150,000. The Elizabeth Line serves London, a city of 9 million. The Borders Railway serves Edinburgh, a city of 500,000. Heavy rail is viable in large cities because large cities generate the passenger numbers to make the cost-per-commuter rational. Cambridge is not London, and no planning decision changes that.

- 77. To bring EWR's cost-per-commuter to the level of the Borders Railway would require approximately 80,000 daily Cambridge commuter trips. At EWRCo's own conventional mode share of 10%, that implies 800,000 people commuting into Cambridge daily. Cambridge currently has approximately 100,000 jobs in total. The scale of growth implied has never been stated, costed, consulted upon, or subjected to democratic scrutiny. DfT's own written response acknowledges that the growth required to justify EWR is "not all in current plans." If the business case for an £8 billion infrastructure project rests on growth not in current plans — at a scale never specified or mandated — the Examining Authority, the Secretary of State, and the public are entitled to know that. "Things would grow up around the railway" is not a business case.

2.3 Why the base-case demand figure cannot be dismissed

- 78. At a meeting between the DfT and the South Cambs Parish Council Rail Group (SCRG) on 2 June 2026, the cost-per-commuter figure was presented: approximately £8 billion divided by EWRCo's Conventional scenario figure of 2,090 daily rail commuters to new Cambridge jobs yields approximately £4 million per commuter. Mr David Hughes, EWRCo's Chief Executive, responded that the project would not be signed off if that figure were correct. When it was pointed out that the figure is derived directly from EWRCo's own published document — ETR Appendix 4, Table 4.1 — no rebuttal was offered.
- 79. The figure of 2,090 daily commuters is produced by EWRCo's own trip-end model, Conventional scenario. EWRCo describe this scenario as "representing market sizes and mode shares experienced today" (ETR Appendix 4, §4.2), calibrated against the Census 2011 travel-to-work dataset (NOMIS WU03EW). It therefore represents the best available estimate of demand grounded in observed commuting behaviour. Displacing it requires either demonstrated evidence of a step-change in travel behaviour or a specific and evidenced justification for higher model parameters.

Station	Journey Time (mins)	% Commuting to Cambridge (market share)	% Rail Mode Share	Daily Rail Commuters	Peak Hour (pre-pandemic)
Cambourne	15	30%	10%	920	540
Tempsford	24	5%	40%	440	250
Bedford	36	2%	55%	450	260
Stewartby	40	1%	55%	60	30
Ridgmont	44	1%	55%	60	30
Woburn Sands	46	1%	55%	130	80
MK / Bletchley	60	0%	65%	30	20
Total				2,090	1,210

Table 4.1: Conventional Scenario — daily Cambridge rail commuters by station (source: EWRCo Economic and Technical Report Appendix 4, May 2023)

- 80. Neither has been published. EWRCo's Appendix 4 also presents a Transformational scenario yielding approximately 7,990 daily commuters — nearly four times higher — produced by uplifting both the market-size parameter (the share of employed population commuting to Cambridge) and the mode-share parameter (the share travelling by rail). EWRCo themselves describe this scenario as "a plausible but very aspirational world" where these parameters represent "around the limits of what is observed today... which may not be transferrable between contexts" (ETR Appendix

4, §4.2). The A428 dual carriageway provides a direct and recently improved road alternative between Bedford and Cambridge, making any shift towards the aspirational limits less plausible than in 2011, not more. An Examining Authority applying the TAG A2.3 dependency test must work from the Conventional scenario figure in the absence of credible contrary evidence.

2.4 The Cambridge–Oxford corridor: development already happening

81. Crucially, housebuilding along the Cambridge–Oxford corridor is already occurring at significant scale without EWR. This was confirmed by Huw Merriman MP, then Parliamentary Under-Secretary of State for Rail, in oral evidence to the Transport Select Committee (Q214):^[7]
82. *"There is already a huge amount of housebuilding going on between Oxford and Cambridge right now."*
Transport Select Committee, Oral Evidence: East West Railway, 6 March 2024, Q 214. Huw Merriman MP, then Parliamentary Under-Secretary of State for Rail. [7]
83. This admission is fatal to the transformational economic case. If housing is already being built without EWR — and this is acknowledged by the responsible Rail Minister at the time — then that housing cannot be counted as dependent on EWR for the purposes of TAG A2.3 para 4.1.7. The 56,000 homes that Dame Kelly identified as necessary for a BCR of 1.5 must be 56,000 genuinely additional homes that would not be built without EWR. The promoter has not identified which those homes are, in which specific locations, or how the dependency is established.

2.5 The Cambourne case study: dependency fails in detail

84. The most detailed test case for the dependency argument is Cambourne. The January 2026 Greater Cambridge Local Plan Update, prepared by GCSP, allocates approximately 13,500 homes north of Cambourne — a development that EWRCo's economic case treats as transport-dependent and uses as part of the justification for the railway. EWRCo's own Economic and Technical Report works not in dwelling numbers but in population and worker equivalents: Table 4.1 of ETR Appendix 4 uses a dependent development population increase of 53,400 at Cambourne, which at EWRCo's own conversion factor of 2.29 persons per household implies approximately 23,300 homes — some 70% above the adopted Local Plan allocation. In other words, the ETR's own input assumptions significantly exceed the planning position before any question of transport dependency is addressed.
85. Three separate bodies of evidence demonstrate that the attribution of this development to EWR is unjustified.

(a) EWRCo's own transport modelling: very low rail mode share

86. EWRCo's Conventional Scenario modelling (Table 4.1 of ETR Appendix 4)^[9] for a Cambourne station shows:
 - Rail mode share from Cambourne: approximately 10%
 - Proportion of Cambourne residents commuting to Cambridge: approximately 30%
87. This means that on EWRCo's own figures, only around 3% of all working Cambourne residents would use EWR to travel to Cambridge. For the remaining 97%, the presence or absence of EWR makes no material difference to their transport choices. It is not credible to argue that 13,500 Local Plan homes are "dependent" on a transport intervention used by 3% of the population.
88. EWRCo also presents a Transformational Scenario (Table 4.2) using a 20% rail mode share and 40% commuting rate — more than double the Conventional figures on each

parameter. Appendix 4 itself defines this scenario as "representing a plausible but very aspirational world where market sizes and mode shares represent around the limits of what is observed today for a given mode share, which may not be transferrable between contexts." It further states that the trip-end model used to generate these figures "cannot calculate an accurate demand forecast but can help to provide an upper bound." The Transformational figures are therefore, on EWRCo's own account, an uncalibrated upper bound, not a forecast — and the Department has not adopted them as the basis for the BCR.

(b) CCC Transport Evidence Report: less than 1% of Cambourne trips to CBC by rail

89. The Cambridgeshire County Council Transport Evidence Report (October 2025, Table 90)^[8] provides a granular origin-destination breakdown of trips from expanded Cambourne across all modes. Table 90 shows that 6% of all Cambourne trips have Cambridge city centre as their destination, with a further 1% destined for the Cambridge Biomedical Campus (CBC) — a combined total of 7% of all trips with any Cambridge destination. The vast majority of trip purposes — shopping, healthcare, education, leisure — have no Cambridge destination at all and are entirely unaffected by EWR's presence.
90. Critically, Table 90 records trips across all modes, not just rail. Applying the 10% rail mode share from EWRCo's own Conventional Scenario, the proportion of all Cambourne trips that would be made by EWR to Cambridge is approximately 0.7% — fewer than one trip in 140. Even using EWRCo's own aspirational Transformational rail mode share of 20%, the figure rises only to around 1.4%. A transport scheme whose primary justification is improving Cambridge access cannot credibly be described as the enabling infrastructure for a community where fewer than 1 in 70 trips — on the most optimistic assumptions — would use it to reach Cambridge.

(c) Cambourne is not transport-constrained: existing and planned alternatives

91. The Cambourne–Cambridge corridor is already served by the A428 dual carriageway, which carries regular bus services as well as private car traffic, and by the Madingley Park and Ride, which provides an established public transport interchange for Cambridge-bound journeys. That corridor is being further improved: the A428 Black Cat to Caxton Gibbet dualling scheme is currently under construction and expected to open in 2027, cutting peak journey times by a further 10 minutes and making car travel more competitive with any rail alternative. Cambourne residents are not without transport options to Cambridge today — and those options will improve materially before Phase 3 could open.
92. The Cambridge to Cambourne Busway (C2C) — a dedicated guided busway — awaits the recommendation from the Planning Inspector following a public inquiry. It has not yet received a decision from the Secretary of State, but if approved it would deliver journey times directly competitive with EWR for the Cambourne–Cambridge origin-destination pair, at a fraction of the capital cost and without severing South Cambridgeshire communities.
93. Additionally, the Cambridge Growth Company and the Cambridgeshire and Peterborough Combined Authority have commissioned a Mass Transit Strategic Outline Business Case which explicitly covers the Cambourne–Cambridge corridor, appraising options from bus rapid transit to light rail. That study is due to report in late 2026.
94. If consented and built, EWR to Cambridge would not be complete until the late 2030s, on EWRCo's own timetable as stated in the 2026 consultation. It is highly probable that at least one of these alternatives — the busway, mass transit, or both — would be operational well before EWR were to open. If so, the transport connectivity that EWR claims as its enabling justification for Cambourne housing would already exist,

delivered by other means. Any housing built in the interim would have been enabled by existing roads, the approved busway, or mass transit — not by EWR. By the time EWR were to complete, there would be nothing left for it to unlock.

95. Under TAG A2.3, the dependency test requires EWRCo to demonstrate that housing development would not occur without EWR. Given existing road and bus provision, the pending busway decision, the mass transit study covering the identical corridor, and EWRCo's own completion timeline of the late 2030s, that test cannot credibly be met for Cambourne.

(d) Cambourne development is happening anyway

96. Cambourne is already under active expansion. Planning permissions have been granted, infrastructure is being delivered, and residents are moving in — all without EWR. South Cambridgeshire District Council's Local Plan includes significant housing growth in the Cambourne area independent of any EWR assumption. The housebuilding is happening because of local planning decisions, not because of EWR.

(e) Dullingham: a 150-year natural experiment

97. A telling illustration is provided by Dullingham, a village in East Cambridgeshire approximately the same distance from Cambridge as Cambourne, and connected to Cambridge by rail for over 150 years. It has not been developed at scale. If rail connectivity were the enabling condition for housing growth — as EWRCo's dependency argument requires — Dullingham represents 150 years of unrealised potential. The more plausible explanation is that Dullingham falls within East Cambridgeshire District Council rather than South Cambridgeshire District Council, and has not been allocated for strategic housing development in successive local plans. The binding constraint on housing delivery is a planning decision, not a transport deficit. If planning authority jurisdiction is the true barrier to housing growth in East Cambridgeshire, the remedy is a local plan allocation — not a railway costing £8 billion. This is precisely what TAG A2.3 requires the promoter to demonstrate: that development would not occur without the transport scheme. Dullingham demonstrates the converse — that transport schemes do not cause development to occur. The actual determinants of where housing gets built are planning policy, developer appetite, land ownership, infrastructure capacity and market conditions. Rail connectivity is neither necessary nor sufficient.

(f) TAG Dependency Test failure

98. EWRCo's claim that Cambourne dependent development is EWR-dependent rests on what DfT's updated TAG Unit A2.2 ("Induced Investment", May 2025) terms "partially enabled" dependency: that road congestion is a binding transport capacity constraint and EWR alleviates it sufficiently to allow the development to proceed. EWRCo's own Conventional Scenario (Table 4.1, ETR Appendix 4) demonstrates that this claim fails.
99. Table 4.1 shows that 30% of Cambourne's employed working population commute to Cambridge, of whom 10% use rail and 90% travel by road — 27% of all workers in total. The dependent development population at Cambourne (53,400 people, approximately 26,300 employed workers) would therefore generate approximately 7,100 additional Cambridge-bound road commuters alongside approximately 790 new EWR rail commuters per day. For every new EWR commuter generated by the dependent development, approximately nine additional car commuters are added to the Cambourne–Cambridge road corridor. EWR does not alleviate the road capacity constraint — on EWRCo's own figures, it substantially intensifies it. Nor does EWRCo's Transformational scenario improve matters: its higher market share (40%) more than offsets its higher rail mode share (20%), yielding 32% of all workers driving to Cambridge — worse than the Conventional scenario's 27% — and approximately 8,400 new road commuters against 1,050 new rail users from dependent

development.

100. TAG A2.2 requires that congestion disbenefits caused by development traffic be netted off against any claimed dependent development benefit. No such netting has been published by EWRCo. TAG A2.2 also requires dependent development to be “Dependent Additional Development” (DAD): genuinely additional housing that would not be built elsewhere in the absence of EWR. Given the acute national housing shortage and the existing South Cambridgeshire planning pipeline, that assumption is not evidenced.
101. TAG A2.2 further specifies that a transport scheme making an area generally “more attractive” to live or work cannot generate dependent development benefits — only resolution of a specific transport capacity constraint qualifies. Since paragraph 99 above demonstrates that EWR does not resolve the road capacity constraint, the only remaining explanation for the Transformational scenario’s higher market share is general attractiveness. That is precisely what TAG A2.2 excludes.
102. The C2C busway and the CPCA mass transit study (see §2.5(c) above) provide an independent basis on which to resolve the Cambourne–Cambridge transport constraint before EWR opens. If either does so, the dependency link is broken entirely: TAG A2.2 requires EWR to be the enabling condition, not one of several possible alternatives. DfT’s own research, cited in TAG A2.2, found that five out of six road-linked dependent development appraisals overestimated delivery by 30–50%; the guidance now mandates a switching-value test to assess whether this level of under-delivery would drop the scheme into a lower value-for-money category. EWRCo has not published this test.

2.6 The promoter has not identified genuinely dependent development

103. Despite being challenged on this point in Select Committee, in written correspondence, and in previous consultation rounds, EWRCo has not produced a list of specific housing developments, in specific locations, that are demonstrably dependent on EWR in the sense required by TAG A2.3. The closest the promoter has come is to point to corridor-level economic growth projections — but these are not broken down by transport dependency, and they treat EWR as one of several potential policy levers, not as the necessary enabling condition.
104. Greater Cambridge Shared Planning — the joint planning service for South Cambridgeshire District Council and Cambridge City Council — is partly funded by central government. This creates at least an appearance of institutional conflict when it comes to formal statements on whether planned development in the area is or is not dependent on EWR, given that government has a policy interest in the project proceeding. Formal statements from GCSP on this question should be read with that context in mind.
105. Until EWRCo can demonstrate, site by site, that 56,000 homes would not be built without EWR, those homes cannot lawfully be included in the economic case. On current evidence, they cannot.

2.7 Local authority evidence: the real constraints on housing delivery have nothing to do with EWR

106. EWRCo will argue that the large pipeline of unbuilt consented homes in South Cambridgeshire demonstrates the need for EWR to “unlock” stalled development. This argument inverts the evidence. Those homes already have planning permission. They are not stalled because of a transport constraint — they predate any EWR consent and have been allocated in Local Plans that make no reference to EWR as an enabling condition. EWR cannot unlock what transport has not locked. The real

constraints on delivery are entirely separate from transport, and EWR addresses none of them.

107. EWRCo's transformational housing case depends not only on the dependency test being met, but on those houses actually being built and generating economic activity within the appraisal period. Local authority evidence from the Cambridge area comprehensively undermines this assumption.
108. Stephen Kelly, Planning Director of Greater Cambridge Shared Planning — the joint planning service for South Cambridgeshire District Council and Cambridge City Council — confirmed in autumn 2025 that of the 10,000 dwellings with planning permission at Northstowe, only 71 had been sold in the preceding twelve months.^[12] Northstowe is one of the largest planned settlements in England, allocated in adopted Local Plans with full infrastructure funding, and located on the existing Cambridgeshire Guided Busway. It is, in other words, precisely the kind of development that EWRCo's economic case assumes will be unlocked by improved transport connectivity. The evidence is that it is not being unlocked — because the constraint is developer build-out rate and market absorption, not planning permission or transport access.
109. Bridget Smith, Leader of South Cambridgeshire District Council, stated in a BBC Radio Cambridgeshire interview with Chris Mann that there are currently 39,000 dwellings with planning permission in South Cambridgeshire that have not been built.^[13] She attributed this directly to the behaviour of housing developers. To put this figure in context: Cambridge City itself comprises approximately 50,000 dwellings in total. There are already the equivalent of almost an entire Cambridge City's worth of unbuilt, consented homes sitting in the pipeline in South Cambridgeshire — without EWR.
110. These are not fringe sites or marginal allocations. They are consented developments in an area with an internationally recognised economy, full Local Plan support, and existing transport infrastructure. If they are not being built, it is because the housing market cannot absorb supply at the rate planners project. No amount of additional transport infrastructure changes this constraint.
111. The implication for the EWR economic case is direct and mathematical. At the observed Northstowe build-out rate of approximately 71 dwellings per year from a 10,000-unit site, it would take over 140 years to complete that site alone. EWRCo's BCR calculation requires 56,000 genuinely dependent homes to be built and generating economic activity within the appraisal period. The local authority evidence shows that homes with planning permission and transport access are not being built at anything approaching the rate assumed. The economic benefits that depend on those homes materialising within the appraisal period will not materialise.
112. A further statutory constraint makes this position still more acute. The Environment Agency has confirmed, in its formal response to EWR's Environmental Impact Assessment Scoping Report, that the project area lies in a zone of serious water stress, that new consumptive groundwater licences are not available, and that surface water abstraction is restricted to high-flow periods only. No railway can substitute for a water supply. Homes that cannot receive planning approval because of water resource objections would not be built regardless of what transport infrastructure is provided.
113. The Water Resources East Regional Plan (January 2025) states directly: "A lack of available water resources is now severely constraining growth in Eastern England." Non-domestic water connections are already being rationed to 20,000 litres per day — a level the plan itself describes as "insufficient for water intensive businesses such as... datacentres and giga factories." This applies now, before a single EWR-

dependent home is built.^[31] The plan identifies the supply-side schemes required to resolve the deficit: the Fens Reservoir (88 megalitres per day, target 2036); the Lincolnshire Reservoir (169 Ml/d, target 2040); and two desalination plants at Bacton (60 Ml/d, target 2040) and Mablethorpe (50 Ml/d, target 2040). Desalination is among the most capital-intensive and energy-hungry forms of water supply: development costs alone for Bacton are £77 million during 2025–2030, and for Mablethorpe £72 million, before a single litre of water is produced. Construction costs will be substantially higher. All four major schemes have target delivery dates at or after EWR's own projected completion date in the late 2030s. The water infrastructure needed to support EWR's dependent housing does not exist, cannot be built before EWR completes, and requires its own separate NSIP consenting processes and many billions of pounds of investment that does not appear anywhere in EWRCo's economic case.

114. Anglian Water Services (AWS) — the statutory water and sewerage undertaker for South Cambridgeshire and Cambridge — makes the same point in its formal scoping response (para 6.7.11). AWS asks EWRCo to demonstrate in the Business Case how the project's connectivity gains will actually unlock the economic growth and housing attributed to the railway — the same dependency question that underpins this response. AWS states explicitly that investment in water and wastewater infrastructure "over and above that agreed in Ofwat's Final Determination in December 2024" will be required, and identifies five separate Nationally Significant Infrastructure Projects of its own that must be delivered alongside EWR's construction programme.^[30] None of this additional water infrastructure has been costed or included in EWRCo's published appraisal.
115. The real constraints on housing delivery in Greater Cambridge are therefore: developer appetite and build-out rates; market absorption capacity; and statutory infrastructure deficits in water and sewerage. None of these are transport constraints. None are addressed by EWR. The 56,000 homes that the BCR requires are not going to be built within the appraisal period because of factors that a railway cannot change.

2.7 The Cambridge Development Company's plans undermine the dependency case entirely

116. A consultation has recently been held on whether to establish a Cambridge Development Corporation covering South Cambridgeshire and Cambridge City. No decision has yet been announced, but the consultation proposes planning for between 150,000 and 250,000 additional dwellings within that area alone.^[14] Those plans make no reference to EWR as a dependency or enabling condition. They are being developed, consulted upon, and would be promoted through the planning system entirely independently of EWR.
117. This is significant for the dependency argument regardless of the CDC's formal status. EWRCo's 56,000 and 100,000-home figures are corridor-wide — covering the full Oxford-to-Cambridge route. The CDC consultation covers only South Cambridgeshire and Cambridge City, which is a subset of that corridor. Yet within that subset alone, development of 150,000 to 250,000 homes is being planned and promoted without any stated EWR dependency. TAG A2.3 para 4.1.7 requires that development would not occur without the transport scheme. If housing at a scale that exceeds EWRCo's entire corridor-wide figure is being planned for just the Cambridge end, without EWR as an enabling condition, then EWR is plainly not the enabling condition for housing growth in that area. The homes would be planned — and insofar as the market and infrastructure constraints permit, built — regardless.
118. Taken together, the evidence from Stephen Kelly, Bridget Smith, the Environment Agency's water and sewerage constraint, and the Cambridge Development

Company's plans demonstrates that the real barriers to housing delivery in Greater Cambridge are institutional, financial, and infrastructural — none of which are transport constraints, and none of which EWR can address. The planning system is already generating permissions far in excess of what the market or the utilities network can absorb. The 56,000 "EWR-dependent" homes needed to justify the project are not secure, not additional, and not dependent on EWR.

2.8 The Tempsford New Town: road and ECML-dependent, not EWR-dependent

119. The proposed Tempsford New Town — a Government-backed development of approximately 40,000 homes — provides a further and independent test of EWRCo's dependency argument. It fails that test comprehensively.
120. Tempsford, like Cambourne, sits on the A421/A428 dual carriageway corridor connecting Cambridge and Bedford. The A428 Black Cat to Caxton Gibbet improvement scheme — currently under construction and expected to open in 2027 — will add 10 miles of new dual carriageway with upgrades to the Black Cat and Caxton Gibbet junctions, cutting peak journey times by 10 minutes. National Highways explicitly identifies improved access to jobs in Cambridge as one of the scheme's benefits.^[37] This scheme is funded, under construction, and will be operational a decade before Phase 3 could realistically open.
121. The transport hierarchy for Tempsford is, in order of significance: the improved A421/A428 dual carriageway, already delivering benefits before any EWR construction begins; the East Coast Main Line, which will give Tempsford residents fast direct access to London's 9-million-strong employment market; and only then, at a distant third, EWR. The gravity model is unambiguous: given a choice between London (9 million jobs, ECML direct) and Cambridge (approximately 130,000 jobs, EWR indirect), the rational commuting choice for the great majority of Tempsford residents is London. Tempsford will be a London commuter town. The TAG A2.3 "but for" test cannot be satisfied: the development is enabled by road and ECML, will be substantially underway long before EWR opens, and is directed primarily toward London rather than Cambridge employment. EWRCo cannot credibly count Tempsford homes in its dependency case.
122. A further implication follows for Cambourne. Once the A428 dualling opens in 2027, road journey times from Cambourne to Cambridge will also improve, making car commuting more competitive with any rail option. Additionally, some Cambourne residents with access to EWR may find it rational to travel west to a Tempsford ECML interchange for London employment — the reverse of EWR's stated strategic objective. In that scenario EWR facilitates London commuting from Cambourne; the strategic case for the route becomes its own counterargument.
123. EWRCo's published modelling assumed a lower Tempsford housing figure than the Government-backed 40,000 now proposed. The actual scale of the new town — driven primarily by ECML access, not EWR — means that corridor housing numbers are further inflated by development that cannot on any reasonable analysis be attributed to EWR under TAG A2.3.

3. The Route: Disproportionate Harm Without Adequate Justification

3.1 Overview of the proposed alignment

124. The proposed alignment through South Cambridgeshire (Phases 2 and 3) introduces a new heavy rail corridor — designed to operate at up to 100mph — through countryside that is currently free from mainline railway infrastructure. The route severs agricultural land, passes through or close to historic villages, crosses wildlife corridors, and imposes noise, light, and vibration impacts on communities that have no existing exposure to mainline rail.
125. In normal planning terms, such a project would require demonstrably compelling public benefits to justify the harm. The requirement for compelling benefits is all the more acute in the context of a BCR that, on the Department's own figures, sits below 1.

3.2 Harm to rural communities

126. The proposed route through South Cambridgeshire would:
- Sever rural parishes, cutting off communities from one another and from agricultural land
 - Require compulsory acquisition of farmland that has been in productive use for generations
 - Introduce a permanent noise and vibration corridor through currently tranquil countryside, affecting the amenity of hundreds of homes
 - Generate construction-phase disruption over a period of years, including heavy goods vehicle movements through minor rural roads
 - Harm protected ecological habitats and wildlife corridors in an area of recognised landscape sensitivity
127. These are permanent, irreversible harms. Unlike temporary disruption, the severing of communities and the degradation of rural amenity cannot be mitigated away: once the railway exists, the affected communities live with it permanently.
128. A further and under-examined harm concerns agricultural land quality. The proposed Phase 3 alignment runs through some of the finest agricultural land in England. The land affected includes Grade 1 and Grade 2 Best and Most Versatile (BMV) agricultural land — a finite national resource that the National Planning Policy Framework requires exceptional justification to develop. The Fens in particular carry a compounding risk: Grade 1 land in the lowest-lying areas faces a long-term threat from sea-level rise and coastal flooding as climate change progresses. Land that is irreplaceable within any realistic policy horizon is being put at permanent risk. The Grade 2 BMV land in the broader South Cambridgeshire corridor is not a candidate for rewilding or amenity offset — it is producing food for a country whose domestic food security is under pressure. The loss of this land — both to the railway infrastructure itself and to the housing developments whose construction the BCR depends upon — represents a genuine economic and strategic cost that does not appear anywhere in EWRCo's appraisal. The BCR treats this land as having zero opportunity cost. It does not.

3.3 No adequate mitigation has been proposed

129. EWRCo's consultation materials include references to mitigation measures — landscaping, noise bunds, wildlife crossings — but these are at a level of generality

that makes meaningful assessment impossible. The specific mitigations needed to address the specific harms in specific locations have not been identified, costed, or committed to. Consultees are being asked to comment on a development for which the mitigation package is unknown.

130. We would expect, as a minimum, that any development consent include:

- Legally binding noise standards at the property boundary, with independent monitoring and enforcement mechanisms
- Full compulsory acquisition at market value plus a meaningful disturbance payment, with no lowballing on the basis of "hope value" suppressed by the scheme
- Publicly funded and independently operated community liaison and complaints resolution throughout construction
- Firm commitments on construction traffic routing, with penalties for non-compliance

131. In the absence of a positive BCR, the threshold for the adequacy of mitigation must be higher, not lower. The Secretary of State cannot approve a project that destroys public value while also failing to adequately protect the communities in its path.

3.4 The Greater Cambridge Mass Rapid Transit scheme: an alternative under active study

132. Compounding the alternatives failure is a directly relevant development that post-dates EWR's consenting timeline. The Cambridge Growth Company (CGC) and the Cambridgeshire and Peterborough Combined Authority (CPCA) have commissioned a Strategic Outline Business Case (SOBC) for a Mass Rapid Transit (MRT) system for Greater Cambridge.^[15] WSP has been appointed to undertake the appraisal, covering a longlist of options from bus rapid transit to tram and light rail. The SOBC is due to feed into the Greater Cambridge Transport Strategy, to be approved in November 2026. The MRT scheme is currently at study stage: no funding for delivery has been committed, and the SOBC itself must first establish the preferred option and make the case before any funding decision can be taken. Nevertheless, the study represents a formal government-backed acknowledgement that alternatives to EWR exist and deserve serious appraisal.

133. The CPCA Mayor has stated publicly that the Mass Rapid Transit scheme — unlike EWR — enjoys widespread political and community support, and that it could realistically be delivered before EWR were to complete in the late 2030s, if consented. This matters for the economic case in two ways:

- **Additionality:** If a Mass Rapid Transit system serving Greater Cambridge — including corridors to Cambourne and the growth areas of South Cambridgeshire — is delivered before EWR were to open, then the transport connectivity that EWR claims as its justification would already exist. The marginal benefit of EWR over a world with a functioning MRT network has not been appraised. On EWRCo's own modelling, rail mode share from Cambourne is only 10%. A mass rapid transit system serving the same corridor would capture much of that demand, reducing EWR's residual benefit to near zero for the Cambridge end of the route.
- **Dependency:** If growth in South Cambridgeshire and Cambourne is enabled by MRT rather than by EWR, then by definition that growth is not dependent on EWR. This would further undermine EWRCo's ability to count any of the corridor's housing growth as a dependent benefit under TAG A2.3. The housing would be enabled by a different, cheaper, more popular transport intervention.

134. The CPCA's SOBC process — funded by DfT, MHCLG and Treasury — represents a direct government acknowledgement that alternatives to EWR exist and deserve serious appraisal. EWRCo's economic case should not be assessed in isolation from this parallel exercise. We request that the Examining Authority seek confirmation from DfT as to whether the MRT SOBC findings will be reflected in an updated EWR appraisal before any development consent is granted.

4. Phase 3 Should Be Separated from the DCO and Deferred

4.1 The three sections are not equivalent

135. East West Rail comprises three distinct sections whose status and controversy are fundamentally different:

CS1 (Oxford to Bletchley): Construction complete — awaiting opening. Broadly follows existing and former alignments. Relatively uncontroversial.

Phase 2 (Bletchley to Bedford — formerly CS2): Largely uses the existing Marston Vale line. Lower cost, less harm to communities, and significantly less opposition. Includes a new Stewartby station. EWRCo proposes four trains per hour to Bedford by the mid-2030s.

Phase 3 (Bedford to Cambridge — formerly CS3): An entirely new alignment through unspoiled South Cambridgeshire countryside — deliberately diverging from the former Varsity Line route. By far the most expensive, most contested, and most BCR-damaging section. Scheduled last: the full Oxford–Cambridge end-to-end service is not operational until the mid to late 2030s.

136. Between Oxford and Bedford, EWRCo chose routes that broadly follow existing or former infrastructure. For Phase 3, it made the deliberate decision to abandon the former Varsity Line alignment and strike a new route through countryside that has no existing mainline rail infrastructure. This single decision is the primary source of the project's cost overruns, community harm, and BCR failure. It has never been satisfactorily explained in public.

137. EWRCo's April 2026 consultation introduced revised terminology: the scheme is now described as being built in "new delivery phases* — replacing the previous connection stages."^[38] The asterisk is significant: it signals that the phasing is subject to conditions — almost certainly funding — that have not been published. Cambridge Approaches uses the Phase 1 / Phase 2 / Phase 3 numbering defined in the Key Terms section above, derived directly from EWRCo's published construction sequence.

138. EWRCo has argued that the cost and complexity of the DCO process itself makes it efficient to consent all delivery phases together in a single application — that running separate DCOs would duplicate expenditure and delay delivery. Cambridge Approaches acknowledges this as a genuine logistical consideration. It does not, however, constitute a planning or economic justification. The DCO process exists to test whether a proposed development should be consented; it cannot be short-circuited on grounds of administrative convenience. If the economic case for Phase 3 is not made out — if the dependency test fails, the BCR is deeply negative, and a credible alternative is under appraisal — then the fact that a joint application is cheaper to run than two separate ones is not a reason to grant consent for Phase 3. The cost saving accrues to the promoter; the risk and harm fall on communities along the route and on the public whose money funds the project.

4.2 Phase 3 is not needed to serve the project's stated commercial beneficiaries

139. The major commercial development most frequently cited to justify east-west rail investment in the central corridor is the Universal Studios theme park planned for the Bedford/Milton Keynes area. Universal requires connectivity from the existing rail

network — specifically a new Stewartby station and the Marston Vale link to Bedford. These are delivered by Phase 2. Universal does not require Phase 3. Not a single metre of the Bedford-to-Cambridge new alignment is necessary to serve this development.

140. EWRCo has suggested that the Universal Studios development will materially increase EWR passenger numbers. This claim does not survive scrutiny. The theme park's primary catchment is northern Europe; most visitors will arrive by air and transfer from London, not via Cambridge. The incremental number of visitors reaching the site from Cambridge — or via Cambridge — is marginal in the context of a theme park drawing millions of visitors from across the continent. More fundamentally, even granting the visitor numbers, visitor fares on a leisure journey from Cambridge to Bedford are too small to move the needle on a BCR that requires £4 billion of additional monetised benefits. Only the employment case can materially affect the BCR — and here the analysis runs in the opposite direction: workers employed at a large leisure development south of Bedford will not, in general, live in Cambridge. Cambridge is an expensive city; housing near Bedford is substantially cheaper. The rational choice for a Universal Studios employee is to live near work, not to buy an expensive Cambridge property and commute west by rail to a job whose salary reflects the leisure sector, not the life sciences cluster. EWRCo has not published a demand model for this specific flow, and the arithmetic does not support the claim.
141. It is worth noting in this context that the Marston Vale Line — the existing infrastructure that Phase 2 would upgrade — currently carries some of the lowest passenger numbers of any line in the country. This is the baseline demand against which the Phase 2 transport case must be assessed; it is not a ringing endorsement of the corridor's rail potential. That the line's own existing traffic is so limited should inform the level of confidence placed in the transformational demand forecasts used to justify the much more expensive Phase 3.
142. This matters because Phase 3 is routinely presented as part of a package whose commercial rationale rests substantially on the western anchor. Once Phases 1 and 2 are operational, that anchor is served. Phase 3 must then justify itself independently — on a corridor where the BCR is approximately 0.3, the dependency test fails, the MRT alternative is being actively appraised, and construction costs have risen by at least 26% since the appraisal baseline.

4.3 A DCO for Phase 3 would bind communities without binding government

143. EWRCo's own representative confirmed at the Non-Statutory Consultation meeting at Shelford Rugby Club on 30 April 2026 that "one government cannot commit its successors to spending — but the planning permission must stand."^[19] This formulation, offered without apparent awareness of its implications for communities along the route, captures the asymmetry precisely.
144. Based on the DCO timetable set out at the same meeting — PI submission in summer 2027, hearings starting January 2028, SoS decision approximately January 2029, with EWRCo's own acknowledgement that the submission "could slip" — any delay pushes the consent decision past the automatic dissolution of the current Parliament on 9 July 2029. A granted DCO would then be inherited by a new government with no obligation to fund construction but facing the full political and legal cost of revoking a granted consent.
145. The practical consequence is planning blight: communities along the Phase 3 route would face years, potentially decades, of uncertainty while the planning permission stands unexercised, land values are suppressed, and development is constrained — with no certainty that the railway will ever be built. This is not a theoretical risk. It is the

predictable outcome of granting consent for infrastructure whose funding is not committed and whose business case is, on the promoter's own figures, deeply negative.

146. A further constraint arises from the statutory DCO lapse provisions. A DCO lapses by default if construction has not commenced within five years of the consent being granted, unless the Secretary of State makes an explicit decision to extend it. A Phase 3 consent granted in early 2029 would therefore lapse automatically in early 2034 in the absence of active government intervention — before EWRCo's own projected construction programme would be complete, or indeed meaningfully underway. Either communities face the full period of blight for a consent that expires without construction, or government is required to make a further active decision to extend — a political commitment that has not been offered and cannot be assumed. The lapse mechanism does not protect communities; it simply restructures the uncertainty.

4.4 Phase 3 cannot be properly assessed without the MRT SOBC and an updated cost appraisal

147. The Greater Cambridge Mass Rapid Transit Strategic Outline Business Case — currently at study stage, with no delivery funding yet committed — is due to feed into the Greater Cambridge Transport Strategy by November 2026. This study directly appraises transport options for the Cambridge corridor, including the specific origin-destination pairs that Phase 3 claims to serve. The CPCA Mayor has indicated that MRT could be delivered before EWR, which has a projected completion date in the late 2030s at the earliest.
148. It is procedurally indefensible to grant development consent for Phase 3 before this study is complete and before its implications for the Phase 3 dependency case have been assessed. If MRT can serve the corridor — at lower cost, without severing South Cambridgeshire communities, and with widespread public support — then Phase 3 as currently designed cannot be justified on any standard planning or economic test.
149. Similarly, capital costs for Phase 3 are still expressed in Q2 2021 prices. A 26% construction cost inflation since that baseline (and rising further due to energy costs) represents at least £1.5 billion of unacknowledged additional cost on the Phase 3 section alone. No Examining Authority should be asked to consent infrastructure without seeing costs expressed in current prices.
150. A third reason the application is premature concerns the Tempsford station design. EWRCo is consulting on, and proposes to include within its DCO application, designs for a combined station at Tempsford serving both the East Coast Main Line and East West Rail. Yet EWRCo's own published materials confirm that "the platforms on the East Coast Main Line (ECML) at Tempsford are separate to the plans to build the infrastructure for East West Rail," and that EWRCo is still "considering all options" for how to consent the ECML element.^[99] The ECML station is Network Rail infrastructure on a mainline controlled by a third party. EWRCo does not control it, has not agreed a design for it, and has not confirmed a consenting route for it. Yet the EWR station design at Tempsford is physically and structurally dependent on the ECML station configuration — the geometry, platform levels, access arrangements, and environmental footprint of the EWR element cannot be finalised until the ECML element is resolved. EWRCo is therefore consulting on a design it cannot finalise, for a structure whose key dependency lies outside its control and has not been decided. An Examining Authority cannot properly assess the Tempsford station — including its environmental impact, land take, and structural engineering — on the basis of an incomplete and contingent design. This is a further reason why this DCO application is not yet ready to be submitted.

4.5 The Examining Authority should recommend separate treatment of Phase 3

151. We ask the Examining Authority to recommend, and the Secretary of State to direct, that:

- **Phase 3 (Bedford to Cambridge) should not be consented in the current DCO application.** The application should proceed, if at all, only in respect of Phase 2 elements not already covered by CS1.
- **Any future Phase 3 application must be preceded by:** (a) publication of the Outline Business Case in full, with capital costs expressed in current prices; (b) completion and publication of the Greater Cambridge MRT SOBC and its implications for the Phase 3 transport case; (c) an independent audit of the dependency assumptions against the TAG A2.3 test; and (d) a genuine alternatives assessment including the Varsity Line alignment.
- **The decision on any future Phase 3 application should be made only by a Parliament with a mandate to commit the expenditure involved.** A consent granted in the dying months of a Parliament, for infrastructure not expected to start for a decade, with a BCR of 0.3 and costs that have risen 26% since the appraisal baseline, does not represent accountable public decision-making.

5. Conclusions and Requests

5.1 Summary of grounds of objection

152. Our objection to EWR rests on three mutually reinforcing grounds:

- **The business case fails on conventional appraisal.** The BCR is below 1 — probably around 0.3 — meaning the project destroys public value on any standard measure. This is not contested by the Department for Transport.
- **The transformational economic case is not established.** The 56,000 homes needed to reach a BCR of 1.5 have not been shown to be genuinely dependent on EWR. The specific evidence from Cambourne — 1% of trips to CBC, 10% rail mode share, housebuilding already happening without EWR, and the existing C2C Busway — demonstrates that the dependency test is not met. The Cambourne analysis is likely representative of other journey pairs along the corridor: distances are short, settlements are small, and heavy rail performs poorly in these conditions because first- and last-mile connectivity is unavailable or prohibitively expensive to provide. The mode-share and dependency failures at Cambourne are not an outlier — they are structural features of the corridor.
- **The harm to communities is disproportionate and inadequately mitigated.** The proposed route causes permanent, irreversible harm to rural communities in South Cambridgeshire. Without a positive BCR, the threshold for justifying those harms is not met and cannot be met on current evidence.

5.2 Requests

153. We therefore ask the Secretary of State to:

- **Refuse development consent** on the grounds that the project does not meet the value-for-money threshold required by HM Treasury, and that the transformational economic case has not been established in accordance with TAG A2.3.
- **In the alternative, commission an independent review** of the economic case before any further consenting steps, specifically: (a) publication of the full Outline Business Case; (b) independent audit of the dependency assumptions by the Infrastructure Projects Authority or equivalent body; (c) assessment of alternatives, including enhanced bus rapid transit and phased rail delivery.
- **Require EWRCo to identify, site by site**, the 56,000 genuinely EWR-dependent homes that are necessary to achieve a BCR of 1.5, and to demonstrate with evidence that those homes would not be built without EWR, before any further reliance on transformational economic benefits in the appraisal.

5.3 Notes and References

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- [20] Lord Hendy of Richmond Hill, Minister of State for Rail, letter to Cambridge Approaches (ref: MC-00039954), 28 May 2025.
- [21] Lord Hendy of Richmond Hill, Minister of State for Rail, letter to Richard Fuller MP on behalf of constituent Gordon Johnston (ref: MC-00063361), 17 March 2026.
- [22] Department for Transport, Information Management & Rights Team, Environmental Information Regulations internal review decision (ref: APL 47858), 16 October 2025.
- [23] Minutes of meeting between South Cambridgeshire parishes, Pippa Heylings MP, and EWRCo (including Tom Wilson, Head of Economic Development, and David Bray, Programme Director), 10 December 2025.
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5.4 Signatories and contact

154. This response is submitted on behalf of Cambridge Approaches. We are willing to provide further evidence, attend hearings, and participate in any Examining Authority process. We request notification of all future procedural steps in this application.

Submitted: June 2026