EWR Statutory Consultation Response - Cambourne
Church Commissioners for England
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June 2026

BIDWELLS

EWR CONSULTATION REPRESENTATION - CAMBOURNE

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1.0 Introduction

1.1 Bidwells write on behalf of the Church Commissioners for England (the 'Commissioners'), the freehold owner of the land at Title No. CB457489, in response to East West Rail's ongoing Public Consultation. The letter reference is 133735-MWJ-Z0-XXX-LET-LEP-001701 and Party ID 5. This consultation response refers to the Croxton to Toft section of the line.

1.2 The Commissioners have a direct interest in land which is affected by the proposals and therefore welcomes to opportunity to provide comment as part of the consultation process.

1.3 The Church Commissioners for England is a registered charity, established in 1948 to manage the Church of England's historic assets, and is responsible for providing financial support for the work and mission of the Church of England across the country. This is achieved through the responsible and ethical management of the Church's permanent endowment fund, a diverse investment portfolio.

1.4 The Commissioners' Estate is primarily leased to tenant farmers who operate agricultural businesses, and the strategic land team also brings forward land for strategic-scale development with the aim of delivering new homes and employment opportunities that support and enhance local surroundings.

1.5 The feedback form as provided by EWR has been completed and is submitted and attached at **Appendix 01**. However, we provide further detailed commentary as part of this representation.

2.0 Description of Landholding

2.1 The landholding extends north and south of the proposed EWR line and the A428 and forms part of a wider, coherent land parcel which is partially under the control of the Topham Family, who run the working farm. The site is currently in agricultural use and benefits from established access arrangements via Ermine Street and St Ives Road. The site is not presently an isolated parcel, and it sits within the larger integrated landholding which is managed as a single operational unit.

2.2 Whilst looking at only the parcels north of the A428 and south of Papworth Everard for this consultation response, the land also forms part of a broader masterplan area which has been identified for potential strategic mixed-use development, of which representations have been made in a Local Planning context.

2.3 The land impacted as part of the EWR proposals represents a logical and sustainable extension to Cambourne, with the capacity to accommodate employment and the masterplan relies on the coordinated delivery, including the retention of connectivity across land parcels, to ensure its overall viability.

2.4 As such, the integrity and functionality of both the Commissioners immediate landholding and the wider masterplan area (as currently occupied and owned by the Topham's), are key considerations. Any proposals which result in severance, restricted access, or sterilisation of the land, have the

potential to undermine not only the current agricultural use, but also its future role within the planned growth area of Greater Cambridge.

3.0 EWR Proposals



3.1 The above image represents the area for consideration as part of this consultation response. The image above demonstrates both the temporary and permanent proposed works across the Croxton-to-Toft section of the line.

3.2 When referring to the drawing sheets as published on the Consultation website, the Church Commissioners landholding crosses the eastern side of Sheet 02 and the western side of Sheet 03.

Temporary Drawings

3.3 The temporary proposals as seen at **Appendix 02**, demonstrate the on-site construction traffic routes and earthwork storage stockpiles along the length of the line. They also show a large position of the eastern side of the Commissioners site as a main construction compound.

Permanent Drawings

3.4 The permanent proposals as seen at **Appendix 03** demonstrate the proposals for new grassland, scattered trees, woodland and wetland. South of the proposed line there is also an attenuation pond and areas of retained habitat. To the north of the line, the drawings also show areas of proposed grassland, scattered trees, wetland, woodland, and enhance habitat. There is also an attenuation pond and proposed rail systems compound. The cumulative effect of these permanent features represents a significant and irreversible reduction in the productive agricultural land available to the holding. The Commissioners are concerned that the permanent land take, ecological mitigation corridors, drainage infrastructure and associated access arrangements will materially weaken the productive capacity of the landholding as an agricultural unit, both in terms of the overall area available for cultivation and the efficient operation of the remaining land.

3.5 From a highways and access perspective, there are proposed access roads to manage the drainage points both north and south of the line, as well as realignment and creation of an overbridge for the A1198 Ermine Street to be elevated over the proposed line. The same is replicated on the west, raising the B1040 St Ives Road.

4.0 Key Comments

Land Take and Property Impact

4.1 The proposed permanent boundary to the south of the railway line would result in awkward and fragmented field parcels, largely due to the inclusion of mitigation areas and a watercourse. This fragmentation would significantly affect the efficient use of agricultural land. The permanent loss of productive land, alongside the fragmentation of remaining field parcels, will reduce the overall productive capacity of the landholding. Modern agricultural operations depend on an ability to work contiguous, regular parcels efficiently with large machinery. The creation of severed, landlocked or awkwardly configured parcels directly undermines this and will impact not only current farming operations but also the long term productive and economic value of the holding. EWR should demonstrate, through its assessment of agricultural impacts, that the extent of permanent land take has been minimised to the greatest extent possible and that the effect on productive capacity has been fully taken into account.

4.2 In addition, the scheme would sever the Church Commissioners Land located to the north of the railway, as there is currently no accessible route from Ermine Street to the A1198. This severance also affects access to existing infrastructure, including a telecommunications mast. As Crow's Next Farm is not under The Commissioners ownership, alternative access arrangements will be required to ensure continued connectivity and appropriate farm accommodation access from the A1198.

4.3 The location of the main construction compound, currently under lease to National Highways for borrow pits, raises concerns regarding land acquisition. Clarification is sought as to whether this could be delivered through a licence or agreement rather than compulsory purchase. For all temporarily occupied land, there must be clear reinstatement provisions to ensure its return to agricultural use, including proper soil handling, drainage restoration and land quality management consistent with the approach adopted by National Highways on the adjacent A428 scheme and that appropriate provisions to this effect must be secured within the EWR scheme.

4.4 The Church Commissioners also hold optional interests in land at North East Farm and Pembroke Farm. These interests establish a clear and material stake in land affected by, or functionally related to, the proposals. It is therefore important that EWR recognises the Commissioners as a relevant interested party in its ongoing engagement strategy and takes these interests into account in relation to land referencing, consultation, and any future compensation considerations. The Commissioners invite EWR to confirm that its land referencing exercise has identified their interest in these parcels and that they will be kept informed of the scheme's progress in relation to them. If those interests have not yet been identified, the Commissioners request that this is addressed before the DCO application is submitted.

Access and Operations

4.5 Detailed highways and access matters have been independently reviewed by Pell Frischmann, with findings set out in the Access Technical Note (**Appendix 05**)**.** The assessment identifies that, based on the information currently available, the proposed access strategy lacks sufficient clarity and assurance to demonstrate that safe, functional and future-proofed access can be maintained across the landholding.

4.6 In particular, the proposals result in a significant severance of the landholding, with three proposed access points that are not supported by sufficient design detail, clarity on access rights, or evidence of suitability for agricultural or future development use. The northeastern access from Ermine Street is of critical importance, representing the only potential means of access to land north of the railway; however, its function, design and legal status remain unclear. It would be the Commissioners preference to retain ownership of the access and grant a right of access for EWR.

4.7 The Technical Note also highlights the absence of key supporting information, including visibility splays, junction design details and Road Safety Audits. Further work is required to demonstrate that all proposed access points meet appropriate safety standards and can accommodate both current agricultural operations and future development requirements.

4.8 The primary construction HGV route is proposed to run around the landholding, which could have a significant operational impact on the farming business. Increased traffic levels may disrupt day-to-day agricultural movements and place additional strain on the local road network. It will be essential to manage road closures and traffic movements around peak farming periods, such as harvest, or alternatively ensure that access is maintained. This approach should align with current National Highways practices, such as those implemented on the A428 scheme.

4.9 Construction traffic is proposed to utilise the existing rear access track, which currently serves as the main access point for agricultural machinery and HGV movements, it is essential that 24/7 access is retained throughout the construction period. The track is currently secured by double electric gates, and equivalent security measures must remain in place. Given that the track is currently single width, it may require widening or the addition of passing places to accommodate increased use and maintain safe and efficient traffic flow.

4.10 There are also access concerns relating to the proposed drainage pond ad surrounding fields. The Commissioners require continued access along the proposed access road to reach land behind Pembroke Farm, as failure to provide this would result in land becoming isolated. Furthermore, maintaining control and ownership of key access infrastructure, such as the track, is preferred post-scheme, with access rights granted to EWR where necessary.

Environmental Mitigation

4.11 Whilst the provision of environmental mitigation is acknowledged as a necessary component of the scheme, the scale and distribution of proposed mitigation land gives rise to a significant permanent land take, which in its current form contributes to fragmentation of the agricultural holding and reduces the efficiency and usability of the land.

4.12 The Church Commissioners consider that the extent of land proposed for mitigation should be demonstrably the minimum reasonably required to achieve the scheme's environmental objectives. In this regard, the alternative design approach previously discussed with EWR comprising a rebalancing of mitigation land north and south of the alignment, together with the relocation of the proposed SuDS attenuation basin to the eastern side of Ermine Street, represents a credible and deliverable option which could achieve equivalent environmental outcomes with a materially reduced impact on the Commissioners' land.

4.13 It will be important for EWR, through the DCO examination process, to clearly demonstrate that the extent of permanent land take is justified and minimised. The Commissioners' proposed alternative should therefore be considered as part of that assessment and taken forward in ongoing design development discussions.

4.14 In addition, the creation of attenuation ponds, watercourses and associated drainage infrastructure necessitates clearly defined and secured access arrangements for management and maintenance purposes. As set out in the Flood Risk and Drainage Technical Note (**Appendix 08**), the current consultation material does not provide sufficient clarity on the design intent, function, or maintenance requirements of these features.

4.15 In particular, the introduction of a new east–west watercourse and associated ecological mitigation corridor has the potential to create significant severance within the landholding, alongside a substantial loss of usable and developable land. Furthermore, the triangular parcel of environmental mitigation on the western side of the site to the south of the line and east of St Ives Road is not sufficiently justified.

4.16 It has not been demonstrated that the proposed drainage features represent the most appropriate solution, nor that alternative options have been sufficiently explored. The Commissioners therefore expect EWR to demonstrate, through further design development and at DCO examination, that:

- The location and scale of drainage infrastructure are aligned with natural topography and hydrological conditions;
- The scheme does not increase flood risk on-site or elsewhere;
- The proposals have been developed in consultation with the Lead Local Flood Authority and other relevant statutory bodies; and
- The extent of land required for drainage and associated mitigation is the minimum reasonably necessary.

4.17 For all temporarily occupied land, reinstatement must incorporate best practice soil handling, drainage restoration and land quality management to ensure a return to appropriate agricultural condition. Weed management should also be proactively implemented and monitored throughout the temporary acquisition period to minimise the risk of seed spread.

Planning and Development Potential

4.18 At present, there is limited engagement with the landowner through the formal consultation process, including the absence of Farm Business Interviews for the Church Commissioners and Topham's Land. This lack of engagement restricts the ability to fully assess and plan for the longer-term implications of the scheme on land use and development potential.

4.19 The presence of severed and landlocked parcels, alongside constrained access arrangements, could limit future development opportunities and reduce the overall value and versatility of the landholding. It is therefore critical that the scheme design incorporates sufficient flexibility and access provision to safeguard the long-term planning potential of the site. Additional clarity on Public Rights of Way, particularly the ping "planned route by others", is also requested, to understand how future access and connectivity across the landholding may be affected.

4.20 The removal of long-term access from Ermine Street and the St Ives Street would put pressure on the requirement to utilise the A428 for access to the site south of the railway line. This would then raise potential highways implications or a requirement for additional infrastructure to be proposed to accommodate the additional vehicular trips on the A428.

4.21 As identified in the Access Technical Note (**Appendix 05**), the uncertainty surrounding access provision, particularly to land north of the route, introduces a material risk to the deliverability of the wider masterplan. Without robust, safe and legally secured access arrangements, the site could be considered constrained or undeliverable in planning terms.

4.22 As identified in the Flood Risk and Drainage Technical Note (**Appendix 08**), the uncertainty surrounding the design, function and extent of drainage infrastructure—particularly the proposed new watercourse and attenuation features—introduces a further material constraint to the deliverability of the wider masterplan.

4.23 The Technical Note highlights that the current proposals are not supported by sufficient information to demonstrate compliance with national planning policy relating to flood risk, nor do they provide clarity on the catchment served, hydraulic performance, or interaction with existing drainage systems.

4.24 The scale of land take associated with the drainage corridor, including a wide (circa 50m) watercourse and associated mitigation land, has the potential to sterilise significant areas of the site and disrupt the coherent layout required to support strategic development.

4.25 Without clear evidence that these features are both necessary and optimally designed, there is a risk that the site could be viewed as constrained in planning terms. It is therefore essential that the drainage strategy is refined to minimise land take, reduce severance, and align with the spatial and delivery requirements of the emerging masterplan.

4.26 Furthermore, due to the access constraints to the north of the EWR proposed line, it would be the preference of the Commissioners to move the proposed environmental mitigation northward, to limit the impact and developable area to the south. With the proposals arising out of Cambourne, the Commissioners site could be viewed as a prime location for sustainable employment uses, as promoted through the local plan process.

4.27 The Commissioners' land forms part of a wider promoted masterplan area, as set out within the 2025 Call for Sites Submission as seen at **Appendix 07** as well as representations to the Greater Cambridge Local Plan Regulation 18 consultation (**Appendix 04**). Those representations, alongside the representation submitted in support of the Greater Cambridge Development Corporation (**Appendix 06**) demonstrate a robust case for the area, to accommodate strategic growth, with the viability, coherence and deliverability of the emerging masterplan being central considerations.

4.28 In this context, the potential loss or restriction of access from Ermine Street, together with significant permanent land take associated with the EWR proposals, has the potential to affect the integrity of the masterplan and could be relied upon by the Local Planning Authority or third parties as a constraint to delivery. This introduces a risk that the site's allocation and strategic role could be challenged on deliverability grounds.

4.29 The Commissioners therefore make a positive case that the alternative design approach outlined above, particularly in respect of mitigation land distribution and drainage infrastructure, would preserve the underlying structure, access strategy and development capacity of the masterplan area. This position is expressly consistent with, and intended to be read alongside, the Regulation 18 representations submitted to Greater Cambridge Council.

4.30 Safeguarding access, maintaining connectivity across the landholding, and minimising severance are all essential to ensuring that the site remains a viable and deliverable location for future growth.

Engagement and Consultation

4.31 The Commissioners note that EWR has undertaken a series of Design Update Sessions through to March 2026, as referenced on the project website. To date, the Commissioners have not been directly involved in sessions relating to the Cambourne section of the route and have had limited engagement with EWR's design team on the specific impacts described in this representation. The Commissioners do not consider that EWR has adequately discharged its pre-application engagement obligations in respect of the Cambourne landholding to date.

4.32 Although we have met with the EWR team to discuss potential alternative schemes, which was both helpful and informative, it remains clear that the design is still evolving and subject to change. A number of elements continue to be explored that were not included within the public consultation, including, for example, the proposed underground reservoir. This is of particular concern given that this represents the final stage of public consultation prior to submission of the Development Consent Order (DCO). In these circumstances, there is a clear and pressing need for continued and meaningful engagement with landowners, with the technical design rationale set out in a transparent and accessible manner, rather than relying solely on the publication of a limited number of plans without supporting background documentation.

4.33 The Commissioners welcome the opportunity for continued engagement and request that they are included directly in forthcoming design workshops and pre-application discussions. Ongoing, proportionate and timely engagement will be important to ensure that landownership interests, access requirements, and masterplanning considerations are appropriately understood and reflected as the scheme progresses towards submission of the DCO application.

5.0 Alternatives and Suggestions

5.1 The Commissioners were invited to undertake a Design Roundtable with EWR' team Tuesday 19 May. This was attended by:

- Lyana Powlesland – Bidwells (Planning Consultant)
- Joyce Lo – The Church Commissioners for England (Strategic Land)
- Guy Webb – The Church Commissioners for England (Farmland)
- Philippa Treadgold – Savills (Rural Surveyor)
- David Watson – Pell Frischmann (Highways)
- Matt Fox – Pell Frischmann (Drainage)
- Lisa Smallwood – WSP (Environment)
- Sandi Suleman – WSP (Drainage / Watercourse)
- Richard Heldreich – EWR
- Mellisa Durham – EWR

5.2 The Church Commissioners have engaged constructively with EWR through recent technical discussions and welcome the ongoing opportunity to input into the evolving design. It is understood that the scheme remains under development, with key elements not yet fixed and a design freeze anticipated in December 2026 ahead of submission in August 2027.

5.3 The discussions confirmed that the current proposals are not intended to represent a finalised position, and that further refinement is both anticipated and achievable through continued collaboration. In this context, the Commissioners consider there to be a clear opportunity to explore design amendments that would reduce land take, improve access, and better align the scheme with the longer-term development potential of the site.

Design Flexibility and Ongoing Development

5.4 EWR confirmed that the design remains iterative, and that elements such as access arrangements, drainage features, and the extent/location of environmental mitigation may be subject to change as further technical work is undertaken. It is also understood that, where appropriate, amendments to certain components of the scheme may be secured post-DCO through legal agreements where changes are not materially substantial.

5.5 The Commissioners welcome this flexibility and consider it essential that it is used to optimise the scheme in a manner that minimises impacts on landholding integrity and future development potential.

Access Strategy and Futureproofing

5.6 Discussions highlighted that further technical work is ongoing in relation to access modelling, and that outputs will be shared with the Commissioners' technical team (Pell Frischmann) to allow review and input. This provides an important opportunity to ensure that access arrangements are:

- Safe and compliant with relevant standards;
- Capable of accommodating existing agricultural operations; and
- Designed to support potential future development of the site.

5.7 The potential to utilise certain access routes (including those associated with attenuation features) for wider use, subject to appropriate legal agreements (e.g. wayleaves or shared access arrangements), is welcomed and should be explored further.

5.8 The Commissioners will continue to engage proactively in this process and provide technical feedback to support a robust and future-proofed access strategy.

Drainage, Watercourse and Reservoir Infrastructure

5.9 The proposed watercourse diversion and drainage strategy were discussed in detail, including the relationship with the underground reservoir infrastructure. It should be made clear that the underground reservoir was not shown on the consultation plans, but revealed when we met. It is understood that:

- The current alignment of the watercourse has been designed to follow the lowest ground levels and provide a gravity-fed solution;
- The proposed route is considered by EWR to represent the least disruptive option from an engineering perspective; and
- The classification, function, and ownership of the reservoir and associated infrastructure remain subject to ongoing clarification.

5.10 Notwithstanding this, the Commissioners consider that there remains scope to refine the layout and extent of drainage features, including associated buffer zones, to reduce land take and improve field configuration.

5.11 In particular, the potential to relocate drainage features (including attenuation provision and requirements for an underground reservoir) to alternative areas such as to the east of Ermine Street, should be further explored, particularly where this could reduce fragmentation and preserve more regular land parcels.

5.12 Furthermore, the ponds within the western triangular environmental mitigation area have not been provided sufficient evidence for inclusion. It was advised by EWR that this are as a whole could be reduced.

5.13 The findings of the Flood Risk and Drainage Technical Note (**Appendix 08**) provide further technical context to the issues discussed above and highlight a number of key concerns that warrant further design consideration.

5.14 In particular:

- The rationale for the proposed east–west watercourse is unclear, with insufficient information provided on the catchment it serves, its hydraulic function, or whether it represents a diversion or creation of a new drainage corridor;

- The proposed route appears to conflict with the natural topography of the site and introduces a wide corridor (circa 50m), resulting in significant land take, visual impact, and potential health and safety considerations associated with depth and earthworks;
- No evidence has been provided to demonstrate that alternative routing options—such as alignment alongside the A1198, integration with existing culvert structures, or accommodation of flows outside the Site—have been adequately explored;
- The design, location and function of surface water attenuation features are not supported by sufficient hydraulic modelling or design detail, and it has not been demonstrated that these are optimally located in relation to the natural drainage regime;
- There is a lack of clarity regarding long-term maintenance responsibilities, access requirements, and the extent of land required for operational standoffs and infrastructure.

5.15 The Commissioners consider that these matters represent a significant omission at this stage of consultation. There is a clear need for further technical information, including hydraulic modelling, flood risk assessment, and evidence of engagement with the Lead Local Flood Authority and Environment Agency.

5.16 The Commissioners therefore consider that there remains substantial scope to refine the drainage strategy, including:

- Reconsideration of the alignment and necessity of the proposed watercourse;
- Reduction in the width and land take associated with drainage corridors;
- Relocation or consolidation of attenuation features to better align with both engineering requirements and future land uses; and
- Integration of drainage design with the wider masterplan framework to minimise sterilisation of developable land.

5.17 These refinements are necessary to ensure that the scheme delivers its objectives without imposing disproportionate constraints on land use and future development potential.

Environmental Mitigation and Land Take

5.18 EWR confirmed that the extent and location of environmental mitigation have been influenced in part by assumptions regarding reservoir infrastructure and ecological requirements, including Biodiversity Net Gain (BNG) and Water Framework Directive (WFD) objectives. It was also noted that a degree of overprovision in mitigation may currently exist.

5.19 The Commissioners welcome the acknowledgement that mitigation requirements, particular land west of Ermine Street and east of St Ives Road may be capable of refinement. In this context:

- There may be opportunities to reduce or redistribute mitigation land without undermining ecological objectives;
- The current use of irregular land parcels (e.g. triangular areas) for mitigation purposes, whilst logical from a design perspective, contributes to wider land fragmentation; and
- Maintaining a balanced approach to mitigation provision without excessive land take is essential.

5.20 The Commissioners therefore reiterate that the extent of mitigation land should be demonstrably proportionate and the minimum necessary, and that alternative configurations should be explored as part of ongoing design development, inclusive of support of detailed drainage specification.

5.21 In particular, the Commissioners draw attention to the triangular parcel of land east of St Ives Road. At the Design Roundtable on 19 May EWR confirmed that the drainage ponds and ecological mitigation proposed on this parcel are not relied upon for drainage or ecological mitigation purposes, and that EWR's requirement is limited to access to the culvert. On the basis of that confirmation the Commissioners expect the land take associated with this parcel to be reduced accordingly in the next design iteration and should be grateful if EWR would confirm this in writing when responding to these representations.

Utilities, Maintenance and Ownership Considerations

5.22 The discussions also touched on the likely ownership and maintenance responsibilities for key infrastructure elements:

- The underground reservoir is likely to be retained by Network Rail, given its complexity;
- Surface features, including watercourses, may fall under landowner control, subject to agreement; and
- Access routes may be shared or subject to specific rights, particularly where required for operational or maintenance purposes.

5.23 These matters will require further clarification, particularly in relation to long-term access rights, operational control, and interaction with agricultural and development uses.

Next Steps and Data Sharing

5.24 EWR has confirmed that:

- ESRI/GIS data will be made available to enable integration with the Commissioners' masterplanning work;
- A technical note in relation to drainage and watercourse design will be published in due course and shared; and
- Further engagement will take place through ongoing design discussions and technical coordination.

5.25 The Commissioners welcome this and consider the provision of technical data to be critical in enabling informed input into the design process.

Securing Commitments within the Scheme

5.26 The Commissioners will be seeking commitments to be secured within the scheme that address the matters raised in this representation. In particular, the Commissioners consider that the following will need to be formally agreed before the DCO application is submitted:

- Safe and legally secured vehicular access to all parts of the landholding, including the land north of the proposed railway line;
- The design, construction and maintenance of drainage and watercourse infrastructure affecting the site, with the Commissioners and their advisors consulted and given the opportunity to review proposals before they are finalised;
- The reinstatement of all temporarily occupied land to an appropriate standard following construction; and
- The preservation of the viability and deliverability of the promoted Kingsfields masterplan.

5.27 The Commissioners invite EWR to engage with them and their advisors on these matters as a priority in the period ahead of the DCO application being submitted, and are ready to engage constructively on that basis.

Summary

5.28 In summary, the Commissioners recognise the progress made to date and the collaborative approach taken in recent discussions. However, the scheme remains at a stage where meaningful refinements can be made.

5.29 The Commissioners will continue to engage positively with EWR to:

- Refine the access strategy to ensure functionality and future proofing;
- Review and optimise drainage and watercourse design;
- Reduce and rebalance environmental mitigation land take; and
- Ensure that the scheme supports, rather than constrains, the delivery of the wider masterplan.

5.30 These design refinements are supported by the findings of the Access Technical Note (**Appendix 05**) and the Flood Risk and Drainage Technical Note (**Appendix 08**), both of which identify fundamental uncertainties in the current proposals and the need for a more robust, clearly evidenced and integrated approach to access, drainage and land use planning across the site.

6.0 Conclusion

6.1 The Church Commissioners support the objectives of improved strategic rail connectivity and recognise the importance of delivering East West Rail. However, the current proposals for the Croxton to Toft section of the route give rise to concerns and objections relating to land take, access, severance, and the implications for the wider promoted masterplan area. There is also concern regarding the importance of the land being currently farmed as a single agricultural unit by the Tophams, as well as ensuring the agricultural unit is safeguarded for the Commissioners future position, should the land be farmed by new occupiers. It is essential that the scheme is designed to ensure that the landholding remains capable of being operated as a standalone agricultural unit independent of any adjoining land to safeguard the Commissioners' position should the current farming arrangement change in the future.

6.2 The Commissioners have identified a series of practical and deliverable design alternatives which, in their view, would materially reduce impacts on landholding and better align the scheme with established planning and development objectives. These alternatives should be robustly tested as part of the ongoing design process and at DCO examination.

6.3 The Commissioners remain committed to engaging constructively with EWR to ensure that the scheme is progressed in a manner which minimises land impacts, maintains operational and access requirements, and supports the long-term sustainable development potential of the wider area, however presently objects to the scheme as proposed though their landholding west of Cambourne.

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