

**TRANSPORT AND WORKS ACT 1992 (“TWA”): THE PROPOSED  
CAMBRIDGE COUNTY COUNCIL AND GREATER CAMBRIDGE  
PARTNERSHIP CAMBOURNE TO CAMBRIDGE ORDER**

Commencing 16<sup>th</sup> September 2025

**Rebuttal Evidence**

**Prof. Louise Hirst, Professor of Materials Physics, University of  
Cambridge**

**On behalf of  
Cambridge Past, Present & Future and Coton Parish Council  
(OBJ-251)**

1. Rebuttal Evidence: CD26-01-APP-W3-1

- 1.1. This rebuttal evidence set out below pertains to Andy Saunders's Proof of Evidence [CD26-01-APP-W3-1] and associated appendix [CD26-01-APP-W3-2].
- 1.2. WSP have performed an updated calculation for CO<sub>2</sub> recovery using DfT Tagbook data from May 2025, for which the forecast proportion of electric vehicles in 2050 increases to 82% from 44% (Nov 2022 data set used in the ES). This difference on its own would result in a substantial reduction in CO<sub>2</sub> recovery over the assessment period; however, WSP choose not to present this data [CD26-01-APP-W3-2 page 18]. Instead, they state they have "taken the opportunity" to also change the traffic model used. This has the effect of approximately doubling the car kms WSP claim will be removed from the road due to "changes in general traffic"; -30,960 tCO<sub>2</sub>e claimed recovery increasing to -56,915 tCO<sub>2</sub>e with the alternative traffic model [CD26-01-APP-W3-2 page 19]. This substantial change in traffic modelling between the Environmental Statement [CD10.01] and the Appendices to Mr Saunders's Proof of Evidence [CD26-01-APP-W3-2] (100% increase) highlights the inherent unreliability of this type of simulation; yet it dominates the projections. It is noted that direct recovery due to people taking the bus, when they would have otherwise driven is negligible by comparison, -2,290 tCO<sub>2</sub>e with Tagbook May 2025 data, far lower than the 29,130 infrastructure carbon required for the GCP scheme. The difference between the Environmental Statement [CD10.01] and the Appendices to Mr Saunders's Proof of Evidence [CD26-01-APP-W3-2] shows that net zero claims based on recovery due to "changes in general traffic" are unreliable.
- 1.3. The simulations presented in CD26-01-APP-W3-2 show near linear recovery post-2050 indicating that an underlying assumption of a fixed proportion of electric vehicles post-2050 has been used. While this assumption is less egregious when using Tagbook May 2025, the simulations presented are still dominated by a time period for which no vehicle type forecasts are provided by DfT and the simulation presented still indicates substantial carbon recovery up to 2085, 66 years after the ban on the sale of new petrol and diesel vehicles.
- 1.4. WSP provide carbon calculations for the CPPF alternative scheme (18,110 tCO<sub>2</sub>e). The GCP requires 29,130 tCO<sub>2</sub>e, 60% more than the CPPF alternative [CD26-01-APP-W3-1 §7.4.6]. This is a significant benefit of the CPPF scheme.