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The Cambourne to Cambridge Order

Cambridgeshire County Council

Transport and Works Act 1992

Transport and Works (Inquiries Procedure) Rules 2004

Inquiry into:

THE CAMBOURNE TO CAMBRIDGE ORDER

REBUTTAL EVIDENCE

of

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of WSP

On behalf of Cambridgeshire County Council

8th September 2025

Planning Inspectorate Reference: DPI/E0535/25/1

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1. INTRODUCTION

1.1.1 This rebuttal has been prepared in response to the Proofs of Evidence of:

- James Littlewood [CD26-10-W1-1]
- Edward Leigh [CD26-10-W3-1]
- Steve Johnstone [CD26-10-W2-1]
- Coton Busway Action Group [CD26-06-1]

1.1.2 I am a Technical Director at WSP and lead the Business Case Advisory team in the Communities and Mobility discipline. Details of my qualifications, professional career and key project experience are contained in my Proof of Evidence [CD26-01-APP-W6-1].

1.1.3 This rebuttal has been prepared with the expectation that it will assist the Inspectors with consideration of the issues raised.

1.1.4 The fact that a point has not been responded to should not be taken as indicating that it is accepted.

2. SCOPE OF REBUTTAL

2.1.1 The scope of my rebuttal relates to matters raised relating to the assessment of the value for money for the Scheme as considered in the Outline Business Case.

2.1.1 My rebuttal should be read with the Rebuttals of other witnesses to be called on behalf of the Applicant.

3. REBUTTAL

3.1 Proof of Evidence of James Littlewood

3.1.1 Within the Proof of Evidence of James Littlewood [CD26-10- W1-1, page 12, paragraph 5.11] it is stated:

“It is also the case that some of the development in this corridor is not reliant on the Applicant’s scheme, or the CPPF alternative, and therefore the Wider Economic Impact and other assessments (such as social benefits) should have excluded it.”

3.1.2 As described in my Proof of Evidence [CD26-01-APP-W6-4, page 6, paragraph 2.1.5] and noted in the conclusions of the Independent Audit [CD8-27, page 76, Audit Conclusion] the assessment has been undertaken in accordance with DfT’s Transport Analysis Guidance (TAG) [CD8-25] for the analysis of impacts of the Scheme.

3.1.3 It is also stated in James Littlewood’s Proof of Evidence [CD26-10-W1-1, page 21, paragraph 7.27] that excluding the active travel benefits would reduce the benefit-cost ratio (BCR). As a mathematical exercise this is correct. However, the effect of this on the Present Value of Benefits would not change the assessment of Medium Value for

Money. It should also be noted that should the maintenance track not be necessary not only would there be a reduction in benefits there would also be a reduction in costs.

3.2 Proof of Evidence of Edward Leigh

3.2.1 Within the Proof of Evidence of Edward Leigh [CD26-10-W1-1, page 11, paragraph 4.1.3] he asserts the need to:

“Update to the baseline for modelling the CtoC scheme proposed by GCP, and an update to the journey time saving benefits quantified in the business case”

3.2.2 As described in the F-Series Highway Local Model Validation Report, CRSM2 was developed “using best practice as set out in TAG” [CD1-25.08, page 11, 1.1] and employing data and TAG parameters available at the time the analysis of the Scheme was undertaken.

3.2.3 Recognising uncertainty around the appraisal assumptions and inputs, sensitivity analysis was undertaken applying changes to the costs and benefits [CD9-32, pages 5 & 7, Tables 5 & 7 **respectively**]. This sensitivity analysis demonstrates the robustness of the Value for Money assessment to different levels of highway benefits, with the Scheme expected to remain Medium Value for Money when indicative benefits are included. The results of these sensitivity tests emphasise the limited contribution to the BCR of highway impacts and the much greater influence on the holistic assessment of value for money of the benefits delivered by unlocking housing.

3.2.4 Updated modelling and analysis will be undertaken at the Full Business Case stage to confirm continued value for money.

3.2.5 In paragraph 4.4.4.3 [CD26-10-W3-1, page 18] Edward Leigh asserts that:

“The 10,300 daily figure in the ECA must be mistaken.”

3.2.6 This appears to be based on a mis-interpretation of the numbers cited from [CD1-20.02, pages 29, Tables 8 to 10) and the conclusion drawn is incorrect. The numbers quoted in paragraph 4.4.4.2 are from the E-series CSRM for 2036 modelling per hour at a specific point east of Scotland Farm Park & Ride site. (It is assumed that reference to 320 in the inter-peak hour is a transcription error as the figure is 232 in Table 9.)

3.2.7 The 10,300 figure is derived from the F-series CSRM modelling with a forecast year of 2041 and represents the 12-hour total passengers using the CtoC scheme [CD1-21.02, page 13, paragraph 4.3.3].

3.2.8 Edward Leigh’s estimate of 3.8m annual passenger-journeys is also incorrect [CD26-10-W3-1, page 18, paragraph 4.4.4.5]. It appears that an annualisation factor of 365 or so has been applied implying that demand and traffic conditions are consistent for every day of the year irrespective of weekdays, weekends and bank holidays. As described in paragraph 9.1.2 of TAG Unit A1.3 “annualisation factors should be used for each

modelled period and should account for differences in flows, modes used and mix of journey purposes” [CD8-25, page 4],

- 3.2.9 For the purposes of the economic appraisal an annualisation factor of 253 is used (the number of days in the year excluding 52 weekends and 8 bank holidays) consistent with the modelling of weekday AM, inter-peak and PM hours.
- 3.2.10 In relation to implications for the BCR [CD26-10-W3-1, page 18, paragraph 4.4.4.6], as stated in the OBC Economic Addendum [CD1-21.02, page 13, paragraph 4.2.8], a conservative approach has been taken with no revenue receipts included in the BCR. And recognising the uncertainty over future demand and benefits a range of sensitivity tests have been conducted, which indicate that the value for money case for the Scheme remains robust under a range of conditions [CD9-32, page 5, Table 5].
- 3.2.11 In paragraph 4.4.5.9 [CD26-10-W3-1, page 20] Edward Leigh identifies that an over-estimate of journey time savings has implications for the BCR of the Scheme. However, it should be noted that the estimated journey time benefit for bus users is £29.9m PV [CD1-21.02, page 14, Table 4-5] which is less than 12% of the total indicative benefits for the Scheme. The exclusion of these benefits, while reducing the BCR would not change the assessment of Medium Value for Money for the Scheme.
- 3.2.12 As identified in paragraph 4.4.6.5.7 [CD26-10-W3-1, page 23], Edward Leigh contends that a bus service via the A428 should have been considered as part of the Do Minimum comparator for the proposed CtoC scheme. As described previously in paragraph 3.2.2 above, CRSM2 was developed “using best practice as set out in TAG” [CD1-25.08, page 11, 1.1] and employing data and TAG parameters available at the time the analysis of the Scheme was undertaken.
- 3.2.13 Also, as noted above (paragraph 3.2.3), changes to assumptions that will impact the estimated highway benefits have been assessed through sensitivity tests. The results of these emphasise the limited contribution to the BCR of highway impacts and the much greater influence of the benefits delivered by unlocking housing for the holistic assessment of value for money [CD9-32, **pages 5 & 7, Tables 5 & 7 respectively**].
- 3.2.14 Paragraph 4.47.1 [CD26-10-W3-1, page 23] refers to the effect of COVID on public transport ridership. As set out in [CD9-32, page 5, paragraph 18 onwards] a sensitivity test was undertaken considering the impact of reduced demand as captured in 2023 counts. It demonstrates that the value for money for the Scheme remains as Medium.
- 3.2.15 As shown in the 2023 Traffic Monitoring Report, motorised trips in and out of Cambridge have steadily increased since 2020 and in 2023 were only 7% down from 2019 levels [CD7-33, page 37, Figure 15]. Park and Ride patronage reached pre-pandemic levels some time ago and is now 25% above 2019 levels [CD7-26].

3.2.16 In the Proof of Evidence of Edward Leigh [CD26-10-W3-1, page 23, paragraph 4.4.8.4] he addresses Land Value Uplift and suggests that:

“The inputs used to calculate the indicative BCR are likely to be incorrect and, when corrected, yield a much lower, and possibly negative BCR, which would represent “very poor” value for money in the DfT Value for Money Framework [CD8-20].

3.2.17 As described below, the “corrected” approaches presented by Edward Leigh (sections 4.4.8.5, 4.4.8.6 and 4.4.8.7) apply erroneous assumptions, are internally inconsistent and do not align with TAG. It is therefore implausible to suggest the Scheme could represent “very poor” value for money.

3.2.18 In paragraph 4.4.8.5.3 [CD26-10-W3-1, page 24] it is correct that the additionality is mis-stated as 3,850 in the Economic Case Addendum [CD1-21.02, page 21, paragraph 4.4.29]. As per paragraph 4.4.22 in the Addendum [CD1-21.02, page 20] 3,850 is the number of homes dependent on the Scheme. This is a transcription error and has been erroneously repeated in 4.4.35 [CD1-21.02, page 23].

3.2.19 Edward’s Leigh’s assumptions in paragraph 4.4.8.5.5 that “the incorrect additionality figure was used” is incorrect. The analysis correctly applied the approach set out in guidance producing a figure of 3,060 homes for additionality. (The difference from Edward Leigh’s figure of 3,073 [CD26-10-W3-1, page 24, paragraph 4.4.8.5.3] is due to rounding.) This is evidenced in paragraph 4.4.35 of the Addendum, which identifies that at 16 dwellings an acre the area allocated for development would be approximately 189 acres (i.e. $3060 / 106 = 191$, with the difference due to rounding).

3.2.20 Additionally, the assumption made in paragraph 4.4.8.5.6 [CD26-10-W3-1, page 24] is incorrect. It is internally inconsistent to reduce the estimate for benefits based on a scenario of lower additionality (e.g. 2,415 homes [CD26-10-W3-1, page 24, paragraph 4.4.8.5.5]), but to retain the full cost of delivering 3,060 homes. In a scenario assuming dependent development benefits associated with additionality of 2,415 houses the assessment of value for money remains Medium.

3.2.21 The average value of residential land used in the estimation of Gross Development Value (GDV) is based on a review of the residential market drawing on published data such as Land Registry, Rightmove.co.uk and Zoopla for new build properties. For the purposes of the economic appraisal values were rebased using the GDP deflator [CD1-21.02, page 22, footnote 4], consistent with Unit A1-1 in TAG [CD8-25, page 4].

3.2.22 In paragraph 4.4.8.6.3 [CD26-10-W3-1, page 25] it is asserted that assuming a residential land valuation of 83% of that used in the LVU analysis results in an Indicative BCR of 0.5. This is incorrect. Assuming a reduction in GDV from £672.07m to £559m [CD26-10-W3-1, page 25, paragraph 4.4.8.6.2] would reduce the Net Present Value (NPV) from £117m [CD9-32, page 4, Table 4] to £4m, and therefore a BCR above 1. Further, as the development costs of the new homes are related to the GDV in terms of

developer profit, fees, marketing and finance costs [CD1-21.02, page 23, Table 4-15] it is internally inconsistent to factor down the benefits without appropriately reducing the costs.

3.2.23 In paragraph 4.4.8.7.2 Edward Leigh presents his own calculation of real house price growth. The use of CPIH is not consistent with DfT guidance. Unit A1-1 in TAG [CD8-25, page 4] describes the approach for accounting for inflation and deriving real prices. The Department uses HMT's GDP deflator and the LVU analysis is consistent with this guidance.

3.2.24 As described above (3.1.22) the conclusion drawn of a negative BCR [CD26-10-W3-1, page 27, paragraph 4.4.8.11] is flawed and implausible on the basis of only reducing the benefit value without addressing the related reduction in costs.

3.3 Proof of Evidence of Steve Johnstone

3.3.1 Within the Proof of Evidence of Steve Johnstone [CD26-10-W2-1, page 13, paragraph 4.01] it is surmised that the BCR for the Scheme is much lower than unity (1:1). As described in response to Edward Leigh's Proof of Evidence the suggested reworked BCRs and the impact on the assessment of value for money demonstrate internal inconsistency in the treatment of elements of the economic appraisal and inconsistency with DfT guidance. On the basis of the rebuttals set out and the results of the sensitivity tests undertaken it is highly probable that the indicative BCR will be above parity.

3.3.2 Furthermore, the Value for Money assessment for the Scheme has been undertaken in line with the DfT's Value for Money Framework [CD8-32]. As set out in the framework, it takes an "*holistic approach to value for money, ensuring the assessment takes the full range of impacts of a proposal into consideration – not just monetised benefit cost ratios.*" [CD8-32, page 4, 1.1.3].

3.4 Proof of Evidence of **Coton Bus Action Group** (CBAG)

3.4.1 Within the Proof of Evidence of CBAG [CD26-06-1, page 15] it is stated that the Scheme benefits are:

"Tied mainly to time savings [and the BCR] indicates that it is poor value for money."

3.4.2 This is an incorrect interpretation of the economic appraisal results. As set out in [CD9-32, pages 2-3, Tables 1-4] the largest component of the Present Value of Benefits is derived from the new housing unlocked by the scheme (dependent development). And the indicative BCR of 1.8 implies Medium Value for Money.

3.4.3 Based on this mis-interpretation CBAG go on to suggest that there will be no benefits of the Scheme if East West Rail (EWR) is delivered [CD26-06-1, page 15]. As stated in the Strategic Case Addendum [CD1-21.01, page 43, 7.2.12], and noted in the Independent Audit [CD8-27, page 72, **section 7.1.15**], CtoC and EWR are anticipated to complement

each other as CtoC will serve locations along the corridor and connect to the city from the west, whilst EWR will link to Cambridge South, the Biomedical Campus and Cambridge station.

- 3.4.4 Any impact on the level of Scheme benefits from EWR being delivered would reflect not only a comparison of journey times between two points, but considerations including the origins and destinations of all travellers in the corridor, access to services, the frequency of services, fares, parking charges etc. along with anticipated opening years for the schemes. There would be no impact on the Land Value Uplift benefits. Therefore, even in a scenario assuming EWR there would be significant benefits generated by the Scheme.

4. STATEMENT OF TRUTH

The rebuttal which I have prepared and provided is true and is given in accordance with the guidance of my professional institution. I confirm that the opinions expressed are my true and professional opinions.