

OBJ-232 C Wigg

I, Claire Wigg, of [REDACTED], am writing to make a formal objection to the "Application for a Transport and Work Act Order to the Department for Transport (DfT) for a new busway linking Cambourne to Cambridge", as submitted by the Cambridge Greater Partnership on 12 November 2024.

I would be grateful for a response acknowledging receipt of this message.

My interest in this project arises from a) being an alumn of Cambridge University and b) my experience and expertise in carbon accounting and standardisation of climate-related claims (since 2014).

My objection is based on

- a) the minimal (almost negligible) assessed greenhouse gas benefit of the proposed busway scheme and
- b) the availability of an alternative bus-lane option, along the route of an existing road, for the stretch between Long Road and West Cambridge (the CPPF route), which would involve considerably less infrastructure construction and associated greenhouse gas emissions.

1. The summary statement (November 2024 CtoC-10-ES0) shows that the magnitude of the expected climate benefit of the busway as proposed is very small – a net emissions reduction of 5,020 tCO₂e over 60 years (standard scenario). This can be put into perspective by recognizing that

- a) a net increase in annual emissions is anticipated for the first 50+ years of the project^[1], long beyond the date which Cambridge City Council is targeting for net zero (2045) and the UK's net zero target date of 2050.
- b) South Cambridgeshire's total transport emissions are around 500,000 tCO₂e per year, whereas the expected net emissions reduction benefit of the busway project (5,020 tCO₂e over 60 years) is just 84 tCO₂ per year.

2. There are many assumptions involved in the modelling and ghg quantification for any project such as this, especially in this case about traffic modes and their future use. From my experience, uncertainty levels in greenhouse gas quantification can easily be in excess of 10%. 10% variation in the wrong direction would render the greenhouse gas benefit of the scheme negligible. The WSP assessment (CtoC-11-TR06-01) mentions uncertainty (paras 4.2 and 5.3.1) but doesn't state an expected level of uncertainty, which is a requirement in established standards for estimating ghg emissions from projects (eg ISO 14064-2).

An example of an uncertain part of the quantification is the 600 tCO₂e reduction from users switching to "active" modes of transport (eg cycling and walking). If the cycling and walking infrastructure at both ends, at all entry/exist points, and all the way along the proposed route is not conducive, then not so many users will make that switch. Yet the emissions from all the necessary infrastructure improvement projects aren't included in the assessment of the CtoC project.

The estimation of ghg emissions arising from construction will also have potentially significant levels of uncertainty.

3. The "standard scenario" is the main conclusion presented and this is the one on which the TWAO should be assessed. This scenario takes into account the expected emissions and emission reductions

from the CtoC busway project^[2]. However the Environmental Statement CtoC-9-00-00 (page 23) refers to a much better scenario, stating that the positive impact of the busway project could be much greater “if considered in combination with numerous other measures”^[3]. But each of these other measures will likely give rise to ghg emissions in themselves, and the ghg impact of these measures has not been considered in the scope of the CtoC busway ghg assessment. Therefore it’s misleading to consider the positive impact of these other measures on traffic emissions from the CtoC project without also considering the ghg emissions that would likely arise from these measures (eg switching to cleaner buses and construction of new cycle and pedestrian facilities).

4. It should be noted that the majority of the anticipated ghg benefit comes not from shifting people from cars to buses (“modal shift”) but from changes in “General Traffic Emissions” which are described as transport efficiency, reduced congestion etc. I’ve not been able to find the data underlying the figure of 30 960 tCO₂e for “changes in general traffic flows” in the documentation available. But if the majority of the benefit arises not from use of the busway itself (since modal shift is only estimated to contribute a benefit of 4500 tCO₂e, just 13% of the total benefit) it seems hard to justify building a totally new and separate busway, including a new motorway bridge, for part of the proposed route. The greenhouse gas emissions from the project would be much lower if the alternative CPPF route was used instead, with potentially the same improvements in general traffic flows.

Yours faithfully

Claire Wigg

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^[1] See **Plate TR06-5-1 - Cumulative Change in Carbon Emission** in CtoC-11-TR6-01 GHG assessment.

^[2] a net emissions reduction of 5,020 tCO₂e over 60 years

^[3] “However, when combined with numerous other measures that are expected to be introduced by the GCP to limit car use in and around Cambridge, there is potential for net savings of about 47,000 tCO₂e,
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