

From: [REDACTED]
To: [TRANSPORTINFRASTRUCTURE](#)
Subject: Objection: busway linking Cambourne to Cambridge
Date: 08 January 2025 19:59:07

Objection to Transport and Work Act Order to the Department for Transport (DfT) for a new busway linking Cambourne to Cambridge

I, Prof. Louise C. Hirst 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.

Grounds for objection: The Environmental Impact Assessment [1], which has been presented as evidence to decision makers, is substantially erroneous and misleading.

Claims of the EIA: The EIA estimates 29,130 tCO₂e infrastructure carbon associated with the off-road route, with a forecast reduction in private vehicle use of 1.25M km annually, amounting to 516 tCO₂e. On this basis, the off-road route would take 57 years to break even on carbon. As such, the EIA claims a minor carbon benefit of -4,500 tCO₂e over a 60 year assessment period.

Error in the assumptions: The EIA assumes average private vehicle CO₂ emissions of 413 g/km. This is already a very high estimate for today’s vehicles (EU regulator target 2020-2024 95 g/km, 4X less than the value used); however, by the end of the assessment period (~2085) almost all private vehicles will have zero tail pipe emissions (100% of new vehicles by ~2035). The EIA predicts approximately linear carbon recovery over the 60 year assessment period (Fig 10-2), indicating this step change in vehicle emissions profile is not included in the calculations. The use of electric buses is extensively discussed in the report but the same for private vehicles is not mentioned. This inequality in the modelling assumptions is highly misleading. In reality we would expect almost no carbon recovery in the latter half of the assessment period. Based on this, it is clear the project is a net carbon emitter contributing >10,000 tCO₂e. There are simply not enough cars taking this route to justify the embedded carbon associated with construction.

Other inadequacies of EIA section 10.3 on Greenhouse gas emissions:

1. The infrastructure carbon calculation does not include the loss of carbon sequestration in the soil and vegetation. The inclusion of tree planting to offset emissions while destroying mature trees can be dismissed as obvious greenwash. While tree planting should be supported generally, this provision is entirely unrelated to the off-road busway and therefore has no place in the scheme justification.
2. The use of a 60 year assessment period, in an apparent attempt to make this highly polluting scheme appear carbon favourable cannot be justified. The effects of climate change are happening now and it is simply not plausible to proceed with this maximum emissions policy with an unsecured and erroneous projection of payback over so many decades.
3. The EIA does not provide a whole life carbon assessment as the model does not include the substantial emissions associated with end-of-life decommissioning.

These inadequacies serve to mislead decision makers by masking the true extent of environmental damage.

Most egregiously, the error in modelling assumptions would not be obvious with a simple reading of the document by a non-expert. It is therefore clear that decision makers have been provided with substantially incorrect evidence with which to evaluate the scheme.

Yours faithfully,

Louise Hirst

[1] <https://www.greatercambridge.org.uk/asset-library/Sustainable-Transport/Public-Transport/Cambourne-to-Cambridge/C2C-TWAO/Draft-documents/8-ES/C2C-ES.pdf>

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