

**From:** [REDACTED]  
**To:** [A47 Wansford to Sutton](#)  
**Cc:** [Implementation](#); [REDACTED]  
**Subject:** PLANNING ACT 2008 (AS AMENDED) SECTION 55 – APPLICATION BY HIGHWAYS ENGLAND FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE A47 WANSFORD TO SUTTON SCHEME.  
**Date:** 19 July 2021 16:01:09  
**Attachments:** [image001.png](#)  
[20210719 Huntingdonshire District Council A47 Adequacy of Consultation FINAL response.pdf](#)

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Dear Deborah Allen,

Please see the letter attached setting out Huntingdonshire District Council's response to PINS' request for our views on the Adequacy of Consultation in relation to Highway England's A47 Wansford to Sutton Scheme.

We look forward to receiving confirmation of receipt and working with PINS and Highways England as the DCO progresses.

Yours sincerely,

Melissa Reynolds  
Senior Implementation Officer  
Development Services  
Corporate Delivery  
Huntingdonshire District Council  
Pathfinder House, St Marys Street  
Huntingdon PE29 3TN

[REDACTED]

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Melissa Reynolds

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19<sup>th</sup> July 2021

The Planning Inspectorate  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Sent by email to: [A47WansfordtoSutton@planninginspectorate.gov.uk](mailto:A47WansfordtoSutton@planninginspectorate.gov.uk)

Dear Deborah Allen

**PLANNING ACT 2008 (AS AMENDED) SECTION 55 – APPLICATION BY HIGHWAYS ENGLAND FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE A47 WANSFORD TO SUTTON SCHEME.**

Thank you for your letter dated 7<sup>th</sup> July 2021 requesting a representation from this Council on the adequacy of consultation and whether this Authority considers that the developer has complied, in relation to this Development Consent Order (DCO) application, with the required duties, including: Duty to consult – Planning Act 2008 (PA2008) – s42, Duty to consult the local community - PA2008 – s47, and Duty to publicise - PA2008 – s48.

This is a technical matter, although it has been approved following due consideration by the Executive Councillor for Strategic Planning of Huntingdonshire District Council (HDC). The benefits of the A47 scheme in terms of the strategic highway network are supported. The Council has continued to work with Highways England (HE) to provide input to the proposals in order to seek the best possible solution for Huntingdonshire and the wider area.

The Council has been consulted by the Applicant as set out below:

- 2018 – Draft Statement of Community Consultation was provided by HE. HDC responded on 28<sup>th</sup> August 2018.
- 2018 – Formal pre-application consultation by HE - information including a consultation brochure, plans of the scheme and a Preliminary Environmental Information Record (PEIR) with an accompanying Non-Technical Summary (NTS) HDC responded by letter on 12<sup>th</sup> November 2018.
- 2020 – Scheme update – HE wrote to HDC with a scheme update brochure on 19<sup>th</sup> October 2020. HDC responded on 19<sup>th</sup> November 2020.
- 2021 – on 6<sup>th</sup> May 2021, HDC was written to by HE with details of a targeted statutory consultation setting out refinements made to the scheme ahead of submission of the Development CO. A response was issued to HE by HDC on 9<sup>th</sup> June 2021.

It is considered that the Council has been properly consulted, as required under the Planning Act 2008 and that the developer, namely HE, has complied with the required duties.

Notwithstanding, there are a number of areas where further information is required and the Council looks forward to the opportunity to assess the relevant detail during the pre-examination period. It is noted in the Consultation Report submitted to PINS that some areas of concern to HDC are stated to have been addressed by the Applicant through its Environmental Statement and its comment relating to hydrogeology was only 'noted'. In HDC's response to the targeted consultation earlier this year, the Council referenced that it would welcome an update on the concerns raised in 2018 and 2020. This is still awaited and, whilst the comments in the Consultation Report state where these matters are addressed in the Environmental Statement, the Council will need an opportunity to review these documents and application detail to assess the responses and consider if these address the Council's concerns fully.

The Council would note that greater technical information could have been provided as part of the consultation in certain areas. The detail of these points is set out in the Appendix to this letter.

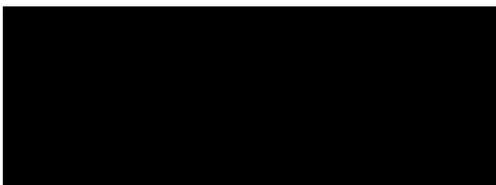
### **Conclusion**

We would like to reiterate the Council's continued support in principle for the proposed A47 improvement scheme, which is considered important to the strategic transport network. It is one of a number of nationally significant infrastructure projects in the area which collectively support the economic agenda for growth and provide a multi-modal local and regional transport network, including East West Rail and the A428 Black Cat to Caxton Gibbet Improvements in the south of the district.

The Council will continue to work proactively with Highways England and our partners to consider any outstanding issues with a view to agreeing as much as possible during the pre-Examination stage and through the Statement of Common Ground process.

For the avoidance of doubt, notwithstanding the points previously raised and also set out in the Appendix, the Council considers the consultation to have met the requirements of ss. 42, 47 and 48 of the Planning Act 2008. If you require clarification on any of the above matters, please do not hesitate to contact the Implementation Team Leader, Claire Burton on (01223) 616841 or [implementation@huntingdonshire.gov.uk](mailto:implementation@huntingdonshire.gov.uk)

Yours sincerely,



**Clara Kerr**

**Strategic Growth Manager**

## Appendix – Detailed Specific Issues

Detail of specific issues are set out below for information and within the Council's previous consultation responses. The Council is confident that all issues can be resolved with suitable engagement and discussion during the pre-Examination stage.

**Land Contamination** – The Council is not aware of any contamination or pollution source within Huntingdonshire that might cause an impact on the proposed road, surrounding DCO land, construction workers or end users. The application site is not within Huntingdonshire, so land contamination records for the site itself are not held by this authority. There is a potential for construction activities and vehicle accidents to cause contamination of the ground, groundwater and surface water (including the river) so this must be carefully considered and designed to prevent.

**Lighting, Noise and PEIR** – Points raised previously in HDC's consultation response (dated 9th June 2021) remain outstanding. These relate to lighting, noise and the PEIR, and we look forward to further discussions with HE regarding these aspects in due course.

**Landscape and Visual Impact** - HDC was consulted on the proposed viewpoints to be included within the Landscape and Visual Impact Assessment, and the likely concerns of HDC relating to the landscape and visual effects of the scheme. It was identified that the proposed A47 road corridor, including ancillary infrastructure and earthworks, will form a part of the backdrop for the Nene Valley, which is covered by HDC Local Plan LP3 – Green Infrastructure.

The proposals should be compatible with and support the aims of the policy, including improving the accessibility, naturalness and connectivity of green spaces, ensuring any loss of green space is met by net benefit, reduction of visual detractors, and the re-naturalisation of waterbodies wherever possible. This policy works in tandem with the Nene Valley Nature Improvement Area (NIA) which seeks to improve the quality of habitat within the Nene Valley landscape and The Cambridgeshire Green Infrastructure Strategy (2011).

The proposals should also ensure that the aspirations of Natural Cambridgeshire's 'Doubling Nature' vision are driven forward through an appropriate set of landscape and ecological enhancement measures, including a robust means for the delivery of biodiversity net gains.

It is important that landscape and visual assessment and the ensuing proposals respond to the above policy framework. To help inform HDC's comments on the scheme, it is requested that a plan showing all proposed vegetation removal is provided as a part of the DCO. Depending on the outcome of the landscape and visual impact assessment, as well as other relevant assessments such as ecology, it may be necessary to provide mitigation measures outside the red line boundary area.

**Flooding and Water** – Volume 5, 5.2 Annex E: Responses from Local Authorities on the Draft Statement of Community Consultation (SoCC) document includes a letter from HDC (dated 28 August 2018) outlining the Council's responses to the draft SoCC (paragraph 1.7). One particular area of concern was concerning mitigation measures to surface water run-off and the consequences of polluting the river.

Volume 5: 5.2 Annex O: Table Evidencing Regard Had to Targeted Consultation Responses of the Consultation Report acknowledges Huntingdonshire's consultation response as follows "Parts of the DCO boundary fall within Flood Zone 3 due to the close proximity to the River Nene. It is understood that areas for compensatory flood storage have been included. It will be for the LLFA and EA to consider if the flood risk impacts will be adequately mitigated through the proposals. We trust that, as a result of mitigation within the scheme design, the proposals will not increase flood risk to land and properties within Huntingdonshire. Previously it was noted by HDC that one of the key risks could be from polluted water entering the river. We look forward to the detailed design, which we hope will address this. (page 50-51 of Annex O).

Highways England's response is provided on pages 50-51 of Annex O and states that: '*A detailed Flood Risk Assessment has been undertaken for the finalised scheme and is summarised in Appendix 13.1 of the Environmental Statement (TR010039/APP/6.3). Mitigating measures have been proposed to ensure the Scheme does not increase fluvial flood risk. The new drainage systems including new attenuation basins, with pollution control devices, to control discharges to local watercourses (see Chapter 13 of the Environmental Statement (TR010039/APP/6.1))*'.

Although HDC acknowledges that Highways England has appropriately documented the Council's concerns, the documents that Highways England have referred to (Appendix 13.1 of the Environmental Statement (TR010039/APP/6.3) and Chapter 13 of the Environmental Statement (TR010039/APP/6.1)) are not yet available online. Therefore, Huntingdonshire District Council will need to review the aforementioned documents once the full Development Consent Order Application has been made available to confirm whether or not the Council's concerns have been fully addressed. These documents should also be made available to the Environment Agency and the appropriate Lead Local Flood Authority and Cambridgeshire Flood Risk Management Partnership (CFRMP) for comment.

**Biodiversity** – The response to Huntingdonshire District Council's previously expressed concerns on biodiversity and the agreed aspiration of Natural Cambridgeshire to double nature within the county has been acknowledged in the Statement of Consultation report. However, the response does not provide any firm commitments to taking specific actions and refers to the Environmental Statement which is not yet available to view. Therefore, it is not possible to determine whether an adequate response to the concerns raised has been provided.