

A47 Wansford to Sutton Dualling

Scheme Number: TR010039

Volume 9

9.4 Applicant's Response to Relevant Representations

The Infrastructure Planning (Examination Procedure) Rules 2010
Rule 8(1)(c)

Planning Act 2008

January 2022
Deadline 1

Infrastructure Planning

Planning Act 2008

**The Infrastructure Planning
(Examination Procedure) Rules 2010**

A47 Wansford to Sutton Dualling
Development Consent Order 202[x]

9.4 APPLICANT'S RESPONSE TO RELEVANT REPRESENTATIONS

Rule Number:	Rule 8(1)(c)
Planning Inspectorate Scheme Reference	TR010039
Application Document Reference	TR010039/EXAM/9.4
BIM Document Reference	HE551494-GTY-LSI-000-RP-TX-30103 P01.01
Author:	A47 Wansford to Sutton Dualling Project Team, Highways England

Version	Date	Status of Version
Rev 0	January 2022	Deadline 1

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1 INTRODUCTION

- 1.1.1 The Development Consent Order (DCO) application for the A47 Wansford to Sutton scheme was submitted on 05 July 2021 and accepted for examination on 02 August 2021.
- 1.1.2 The purpose of this document is to set out National Highway's (the Applicant) response to the Relevant Representations (RR) from interested parties submitted to the Planning Inspectorate.

2 ADDITIONAL RELEVANT REPRESENTATION

- 2.1.1 The Environment Agency submitted a representation after Procedural Deadline 1, however this has been included below, although no reference number has been provided for this representation.

3 MULTIPLE COMMON RELEVANT REPRESENTATIONS

- 3.1.1 There were 50 separate relevant representations, and each has been allocated a reference code (RR-001 to RR-050) with an individual response presented in this report.
- 3.1.2 However, many relevant representations use the same or very similar comments. In order to avoid repeating the same answers, to help the Examining Authority see those relevant representations which have a common theme, a set of Common Responses A to I has been created and cross-referred to.
- 3.1.3 The Common Responses are presented in a table from Page 2.

Common Response Reference	Common Response
<p>COMMON RESPONSE A – WALKING, CYCLING AND HORSE RIDING (WCH) PROVISION TO THE WEST OF THE SCHEME</p>	<p>In accordance with the National Policy Statement for National Networks (NN NPS) the Applicant has used reasonable endeavours to address the needs of cyclists and pedestrians in the Scheme design. The Scheme will also improve Walking, Cycling and Horse Riding (WCH) where possible (in accordance with NN NPS Paragraphs 3.17 and 5.205). The Scheme provides support to walkers, cyclists, horse riders and other vulnerable users by incorporating and upgrading safe, convenient, accessible and attractive routes for pedestrians and cyclists.</p> <p>A WCH Assessment and Review (WCHAR) process has been undertaken as part of the Scheme. The outcome of the assessment is presented in Section 4.8 of the Case for the Scheme (AS-022).</p> <p>The WCH facilities to be provided as part of the Scheme are detailed in Section 7.10 of the Transport Assessment (AS-024) and are shown on the Rights of Way and Access Plans (AS-008). In particular, the Scheme will provide:</p> <ul style="list-style-type: none"> • A new underbridge at the Sacrewell Farm access and a new underpass at the former railway line connecting to Sutton Heath Road, which would facilitate safe north to south movements across the new A47 alignment for users. • Various sections of new shared use cycle tracks to provide safer and more pleasant journeys for cyclists and pedestrians undertaking east to west trips between Wansford and Ailsworth with safer crossing points between the north and south of the A47 alignment. • Overall, the Scheme will provide approximately 3.4km of new infrastructure for pedestrians, cyclists and equestrians. This includes: <ul style="list-style-type: none"> • 535m of a route suitable for all users including a 160m section which runs between the existing all user route at Wansford and along the new link road as far as the new access road for Sacrewell Farm and 375m adjacent to the new access road for Sacrewell Farm which will be a replacement to permissive footpath Wansford Hereward Permissive 3. • 2.4km of shared use cycle track between the Sacrewell Farm access road and

Common Response Reference	Common Response
	<p>Peterborough Road (Ailsworth) that runs adjacent to but segregated from the new A47 alignment.</p> <ul style="list-style-type: none"> • 240m of shared use cycle track that runs along the section of The Drift to be closed to vehicular traffic. • 81m of new Public Right of Way (PRoW) footpath that will replace a 30m section of PRoW footpath that will be lost to the Scheme. <p>Provision of a safe, off-line, bi-directional cycle track on the south side of the existing A1 overbridge would require extensive works, and the additional costs would be disproportionate for the need identified.</p> <p>The existing WCH route across the A1 is via Wansford Nene Way Permissive 1, a permissive footpath which passes under the A1 and is accessed from Peterborough Road in Wansford. Although this existing route is identified as a permissive footpath, it was previously signposted as being available for cyclists and horse riders and is it regularly used by cyclists as evidenced in the WCH surveys. Since the surveys were undertaken, the gradients, width and surfacing of the section of the route between the A1 underpass and the Wansford picnic area have been improved as part of a Designated Funds scheme. The expectation is that usage of the improved route would have increased over the levels observed during the 2018 surveys. The shared use cycle track and the permissive bridleway to be provided as part of the Scheme provide a connection to this existing WCH route.</p> <p>The gradient of the ramped section of the existing route, namely the 50m section leading down from Peterborough Road, is less than ideal. The existing gradient reflects the challenging topography in that location, and it is not possible to improve the gradient as part of the Scheme. Notwithstanding this, the Applicant is of the view that the 50m section of the existing route would not be sufficient of a deterrent to dissuade walkers and cyclists from using the route and the proposed new east to west shared use cycle track and permissive bridleway for undertaking trips between Wansford and local destinations to the east.</p> <p>The permissive status of this route is a pre-existing issue and is not a result of the Scheme. The</p>

Common Response Reference	Common Response
	<p>Applicant has no reason to believe that permission to use the route will be withdrawn. Works have recently been carried out to upgrade it under the Designated Funds scheme mentioned above, to improve access for horse riders and cyclists, and those improvements, together with use of those facilities have not triggered an objection to such use or the closure of the route.</p>

Common Response Reference	Common Response
COMMON RESPONSE B – GEOTECHNICAL RISK	<p>The Applicant's geotechnical design team are aware of potential ground instability within the site area, at the western side of the Scheme between the River Nene and the existing A47. The risks associated with this have been assessed and are included in the Ground Investigation Report which was submitted at Deadline 1 (TR010039/EXAM/9.2). Further ground investigation works have therefore been targeted in that area to confirm the Applicant's assessment of the ground conditions and allow the properties of the encountered materials to be confirmed. This will facilitate the detailed design of the proposed earthworks. These further ground investigation works are due to commence in February 2022.</p>

Common Response Reference	Common Response
COMMON RESPONSE C – SEVERANCE	<p><i>Sutton Drift</i></p> <p>The impact on Sutton of stopping up of The Drift is discussed in the Environmental Statement (ES) Chapter 6 Cultural Heritage (APP-044) section 6.7.18 and Table 6-7 on page 67.</p> <p>The road will be left open and accessible by vehicles from Nene Way up to the point of severance. A gate is to be installed at the northern end of the Drift, allowing for pedestrian and cycle access. The Applicant will investigate use of the proposed underpass by equestrians and will report the findings of these investigations to the Examination at Deadline 2.</p> <p><i>Sutton Heath Road</i></p> <p>Sutton Heath Road would become a cul-de-sac as part of the Scheme as the southern section which connects to the existing A47 will be stopped up, as shown on Sheet 4 of the Rights of Way and Access Plans (AS-008). The resulting 'dead end' at Sutton Heath Road will be in the form of a turning head for vehicles. A gated arrangement will be provided for pedestrian, cyclist and landowner use.</p> <p>A new underpass (Wansford non-motorised user (NMU) underpass (S02)) suitable for use by pedestrians and cyclists would be provided facilitating a connection between the cul-de-sac section of Sutton Heath Road and the proposed cycle track to be provided on the southern side of the new A47 alignment. The proposed underpass would utilise the disused railway alignment that is in cutting at this point providing a grade separated crossing of the new A47 for pedestrians and cyclists.</p> <p>The access to Heath House will be realigned to ensure a safer junction layout. The reference to stopping up is to the 150m length of existing road as shown on the Rights of Way and Access Plans, Sheet 5 of 7 (AS-008).</p> <p>With the new gated access it is not considered that this 'dead end' would attract anti-social behaviour.</p> <p><i>Upton Road</i></p> <p>The assessment of the effects on WCH of removing the existing A47/Upton Road/Peterborough</p>

Common Response Reference	Common Response
	<p>Road roundabout and severing Upton Road are summarised in paragraphs 12.10.49 to 12.10.51 of ES Chapter 12 (AS-016). The assessment reports that the severing of Upton Road, which is an advisory cycle route that is frequently used by cyclists, would result in permanent moderate adverse effects for cyclists travelling between Ailsworth and Upton, despite the provision of the underpass and the shared use cycle track to be provided as part of the Scheme. However, provision of these mitigation measures would result in permanent large beneficial effects for cyclists undertaking trips between other destinations, e.g. when travelling between Southorpe and Ailsworth. On that basis, there is no requirement to provide a further grade separated crossing of the A47 in the location suggested.</p> <p>The severing of Upton Road would result in permanent moderate adverse effects for pedestrians and equestrians using Upton Road to travel between Upton and Ailsworth and between Upton and Sutton, given that the additional journey length via the proposed route would be greater than 500m. However, the numbers of users likely to be affected would be very low. The WCH surveys carried out at the existing A47/Upton Road/Peterborough Road roundabout recorded a total of only 10 pedestrians and 10 equestrians crossing the A47 at the junction throughout the 7-day survey period and almost all of these movements likely comprised single users undertaking a return trip of short duration. Furthermore, alternative, slightly shorter and more attractive routes, for pedestrians and equestrians are already provided between Upton and Ailsworth as part of the Public Rights of Way network to the east and south of Upton. These routes are not impacted by the Scheme and the Helpston Road overbridge facilitates the grade separated crossing of the existing A47 dual carriageway for users.</p> <p>The Applicant has considered ways to deliver improvements that reduce community severance and improve accessibility and has used reasonable endeavours to address any existing severance issues that act as a barrier to non-motorised users, considering what opportunities there maybe to improve access. However an applicant is not required to address all of the issues with the wider WCH network in the local area as part of its application, especially where the termini lie some distance from the Scheme: the improvement of the network in general is a matter for the local highway authority. This applies to enhancements of WCH connectivity between the villages of Upton and Sutton and improve the cycling route between Ailsworth and Sutton.</p>

Common Response Reference	Common Response
	<p>A separate Designated Funds study looking into the feasibility of opportunities to further enhance WCH connectivity in the wider area is currently ongoing. It is understood that opportunities to enhance WCH connectivity between the villages of Upton and Sutton and improve the cycling route between Ailsworth and Sutton would be evaluated as part of this separate study. However there is no guarantee that funding will be secured, and these potential improvements do not form part of the Applicant's case for the Scheme.</p>

Common Response Reference	Common Response									
COMMON RESPONSE D – TRAFFIC AT WANSFORD ROUNABOUTS	<i>Eastern Roundabout</i>									
	<p>The Scheme includes the removal of the partial signalisation of the A1 / A47 eastern roundabout, which operates on the A47 eastbound approach arm in the AM peak hour (7.30-8.30am). There will be a reduction in the A1 southbound traffic approaching the eastern roundabout due to the new free-flow link. Table 7-8 Section 7.6 of the Transport Assessment (AS-024) shows 2025 and 2040 volume over capacity ratios (V/C%) model results on the A47 eastbound approach arm in the AM peak. Analysis of this table shows that in the ‘with Scheme’ Do-Something (DS) scenario, V\C ratios are below the 85% threshold and delays have decreased (2025 AM peak delay ‘without Scheme’ do minimum (DM) 1.2 mins, DS 0.1 mins. 2040 AM peak delay DM 2.9 mins, DS 0.1 mins).</p> <p><i>Table: AM Peak - A47 eastbound approach link to A47\A11 East Roundabout - 2025 and 2040 DS and DM delays (Mins)</i></p> <table><tr><th>Year</th><th>DM</th><th>DS</th></tr><tr><td>2025</td><td>1.2</td><td>0.1</td></tr><tr><td>2040</td><td>2.9</td><td>0.1</td></tr></table>	Year	DM	DS	2025	1.2	0.1	2040	2.9	0.1
	Year	DM	DS							
	2025	1.2	0.1							
2040	2.9	0.1								
<i>Western Roundabout</i>										
<p>No works to the Wansford western roundabout are proposed as part of the Scheme.</p> <p>The traffic modelling assessment has identified ongoing issues with the operational performance of the A1/A47 western roundabout in the base year 2040 DM and 2040 DS scenarios.</p> <p>Based on the VISSIM operational analysis shown in Section 7.9 of the Transport Assessment (AS-024), in the DS scenario there is a reduction in congestion along the A47 eastbound approach arms in the AM (morning) and PM (evening) peaks compared to the DM scenario. The DS scenario also presents a decrease in delay on the Old North Road northbound approach. This</p>										

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	<p>is due to traffic reassignment away from Old North Road primarily onto the A1 and A47.</p> <p>Furthermore, the transport modelling SATURN journey time results along the A47 between the western roundabout and Ailsworth show a travel time saving of approximately 1.5 minutes in 2025 and 1.8 minutes in 2040 for the eastbound direction during the AM peak, when compared to the DM scenario (see the Transport Assessment Section 7.7 (AS-024)).</p> <p>In the westbound direction SATURN journey time results along the A47 between the Ailsworth western roundabout show a travel time saving of approximately 0.8 minutes in 2025 and 1.1 minutes in 2040 for the eastbound direction during the AM peak, when compared to the DM scenario. In the westbound direction in the PM peak the Scheme provides a reduced level of travel timing savings of approximately 0.5 minutes in 2025 and 0.2 minutes in 2040 when compared to the DM scenario (see the Transport Assessment Section 7.7 (AS-024)).</p> <p>In summary the modelling shows that delays are expected at the western roundabout both with and without the Scheme. However, based on the VISSIM operational modelling there will be a decrease in delay on the A47 eastbound approach arms to the western roundabout in the DS 'with scheme' scenario. The provision of two-lane exit at the western roundabout will improve the operation of the A47 eastbound traffic.</p> <p>With respect to the application of smart traffic signals, a transport modelling junction signalisation assessment has been undertaken using the strategic Wansford Traffic Model. This assessment showed that the assessed signalised junction options were not considered to substantially resolve the traffic congestion issues at the western roundabout and will further cause an overall decrease in network performance.</p> <p>This assessment was undertaken utilising the industry standard LINSIG software package to evaluate signal operation in peak hour congested traffic conditions. LINSIG calculates optimal signal settings based on fixed timings. In congested conditions, where all arms are experiencing queuing, these timings will minimise delay across the junction.</p> <p>Safety</p> <p>With respect to road safety in total, COBA-LT modelling analysis indicates that, over a 60-year</p>

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	<p>timeframe the Scheme improvements will save a total of over 250 accidents. (See the Transport Assessment Section 7.12 (AS-024)).</p> <p><i>Old North Road (& Thackers Close) to A1/A47 Slip Road Junction Safety:</i></p> <p>No improvements to this junction are proposed as part of the Scheme, although the junction has been assessed as part of the operational safety reviews.</p> <p>No reported injury collisions have been identified at this junction over the period 1999 to 2020 inclusive, and a full review of all reported collisions in the vicinity between 2015 and 2020 inclusive have shown none that were associated to any movements at this junction.</p> <p>Consideration was given to widening the northbound offslip from the A1 to two lanes to reduce queue lengths at this location. However, a review of this proposal by the Operational Road Safety team highlighted a greater level of risk for the Old North Road junction users who would be required to cross an additional lane of traffic.</p> <p><i>Western Roundabout Safety:</i></p> <p>A review of collisions at the western roundabout over the period 2015 and 2020 inclusive identified two injury collisions:</p> <ul style="list-style-type: none"> • A drunk driver striking the roundabout and rolling the vehicle onto an adjacent vehicle resulting in a serious injury to a vehicle occupant. • A vehicle suffering a loss of power running wide and striking an adjacent vehicle resulting in a slight injuries to two vehicle occupants. <p>In both cases the causes of the collision were not attributed to the road layout and so it is highly unlikely that the estimated increase in traffic will have a detrimental effect on the collision rate.</p> <p>Consideration was given to the opening of two lanes westbound between the Wansford eastern and western roundabouts. However, a safety review undertaken did identify that two free flow lanes on the approach to the western roundabout increased the risk of collisions at the western roundabout.</p>

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<p>COMMON RESPONSE E – CONSULTATION WITH UPTON</p>	<p>Non-statutory consultation was undertaken between March and April of 2017.</p> <p>Three alignment options were presented at non-statutory consultation in 2017.</p> <p>The report on the consultation (Public Consultation Report A47 Wansford to Sutton (AS-029 Section 7.8 Public Consultation Report 2017)) was published alongside the Preferred Route Announcement (PRA) in August 2017 on the Scheme website. Feedback from the communities received during the non-statutory consultation helped to inform further development of the outcome as presented in the Preferred Route Announcement (PRA) (see the Consultation Report (AS-011) and Annex A of the Consultation Report (APP-024) for the PRA).</p> <p>Following on from non-statutory consultation, the alignment designs were developed, and a Scheme Assessment Report (SAR) was produced and published on the project webpage.</p> <p>The 2018 Statutory Consultation showed the alignment shifted as far north as possible (whilst still remaining south of the existing A47). In order to achieve this alignment shift the proposed Nene Way Nene Roundabout was retained at its existing location, with the link to Upton Main Road maintained. However, following feedback from the 2018 Statutory Consultation, the alignment at the east of the Scheme was shifted north of the existing A47 (see the Scheme Design Report (AS-026)).</p> <p>During the statutory consultation a significant amount of feedback was received on the proposals. This included a joint proposal from Wansford and Sutton Parish Councils (entitled A47 Wansford to Sutton Alternative Visions 4 July 2018 (Annex A)), showing a design with a northern alignment, moving the Nene Way roundabout to the west and Upton Road being closed.</p> <p>Following this feedback, the design was further developed moving the alignment north. (See Scheme Design Report (AS-026) and the Design Development Report 2020 (AS-032)).</p> <p>Throughout the development of the Scheme, engagement has been undertaken with stakeholders and with local communities directly and via the Parish Councils. The residents of Upton were consulted individually as Upton was included within the Consultation Zone (see Annex F of the Consultation Report (APP-029)).</p>

Common Response Reference	Common Response
	<p>Although Upton does not have a demographically elected body, a meeting was held with the residents of Upton in July 2020 where the latest proposals were discussed. Whilst there were concerns raised at this meeting, there was not a significant objection to the proposals although the Applicant was asked to look at the Upton Drift and potential improvements that could be made. As a result of that feedback the design was amended to include passing places on the Upton Drift.</p> <p>The Targeted Consultation and engagement undertaken between October and November 2020 included this proposal. On 19 October 2020, the Applicant issued a letter with a Project Update brochure to local residents and businesses in the consultation zone and section 42(1)(a), (b), and (d) consultees. The Applicant also sent this update to the stakeholders identified in Appendix B of the published Statement of Community Consultation (SoCC) (see Annex F of the Consultation Report (APP-029)). This was to provide an update on the Scheme and set out the changes made by the Applicant to its design since the statutory consultation. The Applicant also asked recipients to provide feedback on the updated proposal.</p> <p>In response to the feedback received, the passing places were amended to provide sufficient space to accommodate HGV and agricultural vehicles and the turn at Model Farm has been widened to provide better access to the Upton Road. These design proposals were presented to the community in February 2021.</p> <p>The closure of Upton Road as part of the Scheme was included in the 2020 Project Update. More details are provided in the Consultation Report (AS-011 Section 3.8 Project Update 2020). The residents have therefore had the opportunity to view the proposals and provide their views.</p> <p>The closure of Upton Road will alleviate existing concerns that the road is used by traffic to access the A47 to avoid congestion at the Sutton Heath Road junction. The closure will however result in an alteration to the route taken by the residents of Upton to access the A47. Access to the new A47 will be along Upton Drift and along the proposed link to the Sutton Heath roundabout. The detail regarding passing places along Upton Drift will be agreed with Peterborough City Council.</p>

Common Response Reference	Common Response
<p>COMMON RESPONSE F – UPTON DRIFT / LANGLEY BUSH ROAD SAFETY</p>	<p>The closure of Upton Road will divert all Upton traffic on to Upton Drift. However, the relatively small increase in peak hour traffic (approximately 30 to 100 passenger car units in the traffic model) on Upton Drift has no adverse impacts on the operation of the Upton Drift/ Langley Bush Road junction (see section 7.8.2 of the Transport Assessment (AS-024) where Upton Drift is referred to as Main Road).</p> <p>22 years of collision data from Crashmap™ (1999-2020 inclusive) shows four reported collisions in the vicinity of the Langley Bush Road / Sutton Heath Road junction, and two reported collisions in the vicinity of the existing S-bend on the Upton Drift. Safety improvements are proposed at both of these locations as part of the Scheme as described below.</p> <p>As part of the Scheme, the following improvements are proposed to the route for Upton residents to access the A47:</p> <p>1. Upton Drift</p> <p>In the existing condition the Upton Drift is a through road and therefore can be subject to non-local traffic using it as a route between the roundabout on the A47 and Langley Bush Road. With the proposed scheme, this traffic will now be directed to the new roundabout and will therefore change the nature of the traffic currently using the Upton Drift. The Upton Drift will only have traffic associated with Model Farm and up to 30 properties and no through traffic.</p> <p>Since the 2020 consultation and engagement further design work has been undertaken. Improvement to the Upton Drift consists of the following:</p> <ul style="list-style-type: none"> • Three new passing places, with sufficient space to accommodate HGV and agricultural vehicles • widening of the existing junction with Langley Bush Road • widening of the existing injunction adjacent to Model Farm. • straightening the existing S-bend

Common Response Reference	Common Response
	<ul style="list-style-type: none"> • local widening to 3.5m where required <p>These improvements have been agreed with Peterborough City Council and have been discussed with the emergency services. The Applicant is looking to develop a Statement of Common Ground with Peterborough City Council (a draft of which is to be submitted at Deadline 3, where details of these discussions will be included).</p> <p>2. Junction of Langley Bush Road and Sutton Heath Road</p> <p>Visibility splays at this junction will be improved as part of the Scheme.</p> <p>3. Sutton Heath Road Link</p> <p>The new Sutton Heath Road link will be designed as a single carriageway in accordance with Design Manual for Roads and Bridges (DMRB) CD109 – Highway link design. This will therefore provide a safer design than the existing Sutton Heath Road link.</p> <p>4. Sutton Heath Roundabout</p> <p>The new Sutton Heath Roundabout and it's connections will be designed in accordance with DMRB CD116 – Geometric design of roundabouts. This will therefore provide a safer design than the existing connection to the Nene Way Roundabout.</p> <p>The closure of Upton Road will alleviate existing concerns that Upton Road is used by traffic to access the A47 to avoid congestion at the Sutton Heath Road junction. The closure will however also result in an alteration to the route taken by the residents of Upton to access the A47. Access to the new A47 will be along Upton Drift, Langley Bush Road, and along the proposed link to the new Sutton Heath roundabout.</p> <p>With the Scheme, the increased distance for a journey between Upton and Ailsworth will be approximately 1589m (or 1 mile). Based on the assumptions shown in the attached sketch (Annex B), this equates to an increased journey time of approximately 89 seconds between these locations.</p>

Common Response Reference	Common Response
COMMON RESPONSE G – STATION HOUSE	<p>The Former Wansford Railway Station (WAN01) will need to be demolished as the new carriageway alignment requires earthworks embankment through the location of the existing building. This is detailed in Environmental Statement (ES) Chapter 6 Cultural Heritage (APP-044).</p> <p>On balance, the benefits of the Scheme outweigh the harm caused to this building, which is a non-designated asset.</p> <p>The Applicant discussed WAN01 with Peterborough City Council's Conservation Officer in February 2021. It was concluded that partial preservation of the station house would be undesirable, even if there were no option to relocate, due to loss of key internal and external features as well as the unavoidable difficulty in maintaining a building with no viable use. (The Applicant is looking to develop a Statement of Common Ground with Peterborough Borough Council (to be submitted at Deadline 3) where details of these discussions will be included).</p> <p>Record of Environmental Actions and Commitments (REAC) commitment CH4 within the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1) sets out the proposals for recording the building.</p>

Common Response Reference	Common Response
COMMON RESPONSE H – HISTORIC ENGLAND AND THE SCHEDULED MONUMENT	<p>A road entirely north of the existing A47 is not feasible due to the location and extent of the Scheduled Monument.</p> <p>Feedback to the statutory consultation resulted in a change to the alignment, and a route north of the existing A47 at the eastern end of the Scheme between Sutton Heath Road and the A47/Nene junction has been developed.</p> <p>Following discussions with Historic England the proposed alignment now passes through the southeast corner of the Scheduled Monument.</p> <p>Historic England have been a statutory consultee from the start of the Scheme development and have been consulted with regularly by the Applicant.</p> <p>The following summarises the main engagement with Historic England and the development of the Scheme with regards to the Scheduled Monument:</p> <ul style="list-style-type: none"> • The Applicant held an initial workshop with the Environment Agency, Natural England and Historic England in August 2016. • Formal consultation with Historic England was undertaken in May 2017. • A meeting with Historic England and Peterborough City Council was undertaken on 10 May 2017. • Further meetings between the Applicant and Historic England were held in 2018. • In February 2018 impacts to the Scheduled Monument were discussed. In May 2018 discussions were held regarding impact to scheduled monument and local proposal to route the Scheme through Scheduled monument. There was suggestion of updating the listing information for the scheduled monument. A new Scheme design was discussed at a meeting between the Applicant and Historic England, Historic England were concerned about proximity of the Scheme to scheduled monument and emphasised their position that the existing verge

Common Response Reference	Common Response
	<p>must be retained and not used. Historic England progressed with updating the scheduling listing.</p> <ul style="list-style-type: none"> • In early 2020 archaeological discussion on trenching proposals for the Scheme and works around the Scheduled Monument took place between the Applicant, Historic England and Peterborough City Council, then a meeting was held to discuss potential amendments to the design of the Scheme in relation to the scheduled monument and archaeological trenching. • In March 2021 the Applicant engaged with Historic England regarding flood storage requirements on land within the County Wildlife Site. It was explained that allowing encroachment into the Scheduled Monument in an area that had previously been disturbed would reduce the amount of additional compensatory flood storage that would be required and therefore lessen the impacts on the County Wildlife Site. • In June 2021 Historic England confirmed that encroachment onto southeast corner of Scheduled Monument was acceptable. <p>Annex N of the Consultation Report (APP-037) shows correspondence with Historic England during the Statutory Consultation in 2018 and Annex M shows engagement with Historic England as statutory consultee between 2020 and 2021 (APP-036).</p> <p>The Applicant has engaged with Historic England to establish the extent of the land-take within the Scheduled Monument, taking into consideration engineering constraints and requirements. Discussions with regards to these agreements will be documented in the Historic England Statement of Common Ground submitted at Deadline 3, Historic England confirmed by letter the agreement to encroach onto the southeast corner of the Scheduled Monument in June 2021.</p> <p>Responsibility for designation decisions lies with the Secretary of State of Digital, Culture, Media and Sport. The Applicant and Historic England are bound by the law and regulations affecting Scheduled Monuments.</p>

Common Response Reference	Common Response
	<p>The internal composition of the monument was taken into consideration for design of the section of the proposed carriageway and embankment which encroaches on the monument.</p> <p>Mitigation through excavation and recording has been agreed with Historic England. Mitigation through avoidance has been achieved as far as is practicable through design of the horizontal alignment and embankments in this location. These design considerations were discussed and agreed with Historic England, who will be consulted throughout the development of detailed design, drafting of the Written Scheme of Investigation (WSI) and during works.</p> <p>Consideration of preservation in situ will be a key aspect of the archaeological works set out in the WSI. This will include consideration of burial of the affected part of the scheduled monument as detailed in the Record of Environmental Actions and Commitments (REAC), commitments CH5 and CH6, within the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1).</p>

Common Response Reference	Common Response
<p>COMMON RESPONSE I – CLIMATE CHANGE</p>	<p>The Environmental Statement (ES) Chapter 14 Climate (APP-052) considers the effects on climate from the Scheme and also the vulnerability of the Scheme to climate change in accordance with the requirements of the Infrastructure Planning Environmental Impact Assessment (EIA) Regulations 2017, the National Networks National Policy Statement (NNNPS) 2014, and Design Manual for Roads and Bridges LA 114 Climate (Design Manual for Roads and Bridges (DMRB) LA 114). This includes carbon emissions associated with the Scheme which are presented in relation to the UK's legally binding carbon budgets.</p> <p>A detailed assessment of the embodied carbon through the construction, operation and maintenance has been undertaken using the Highways England Carbon Tool and following the methodology within the associated guidance document. The Department for Transport's Transport Appraisal Guidance Green House Gas methodology was followed to calculate end-user emissions.</p> <p>As well as reporting estimated emissions associated with the Scheme, Section 14.9 of ES Chapter 14 Climate (APP-052) highlights carbon mitigation opportunities taken forward during design and further opportunities to reduce emissions during construction. Section 4.8 'Walking, Cycling and Horse-riding (WCH) Assessment' of the Case for the Scheme (AS-022) demonstrates how the wider Scheme would provide new WCH facilities, improve accessibility for users in the local area and provide the opportunity to choose active travel modes (e.g. walking, cycling, etc.). Sections 4.8 and 5.4 of the Case for the Scheme also report neutral impacts on public transport and a benefit to users due to congestion relief.</p> <p>The ES Chapter 14 (APP-052) considers the release of the Sixth Carbon Budget [REDACTED]</p> <p>In respect of the assessment of carbon emissions, the Introduction at National Planning Policy Statement for National Networks (NNNPS) paragraph 5.16 states that "The Government has a legally binding framework to cut greenhouse gas emissions by at least 80% [now 100%] by 2050. As stated above, the impact of road development on aggregate levels of emissions is likely to be very small. Emission reductions will be delivered through a system of five year carbon budgets that</p>

Common Response Reference	Common Response
	<p>set a trajectory to 2050. Carbon budgets and plans will include policies to reduce transport emissions, taking into account the impact of the Government's overall programme of new infrastructure as part of that."</p> <p>As legislated for in section 1 of the Climate Act 2008 (as amended), the Secretary of State is required to ensure attainment of the net zero 2050 target. Section 4 of the Act requires the Secretary of State to ensure attainment of the carbon budgets at the relevant carbon budget period dates. Therefore, delivery of the emissions reductions necessary to achieve net zero by 2050 is measured through the pathway provided by interim targets of the carbon budgets.</p>

4 RELEVANT REPRESENTATIONS

5 RR-001 ALICE MCNAMARA

Reference	Relevant Representation	Applicant's Response
RR-001-1	<p>Where is the proper cycling infrastructure. A safe cycle path for everyone is needed to cross the A1 and A47. Any path that does not allow tricycles, hand bikes and tandems is disability discrimination. Our world is in climate crisis. Make sustainable transport feasible. Cycle paths create usable spaces for the whole community and bring in business as well as investing in health. Good cycling infrastructure does cost money, but it is incorrect to say it is a large amount in the scope of overall transport spending, or that it is a poor return on investment. Cycling infrastructure has been shown to pay back to society more than it costs – a 2014 UK government report cited returns of between 2:1 and 35:1. Other countries demonstrate returns of 10 times or higher, and London's transport authority reports ratios of 20:1 for cycling investment. Whilst many of the UK figures are for 'general' investment in cycling (i.e. including training, etc.) the higher cost of cycling infrastructure is still justified because of the additional numbers drawn to cycling by the provision of safe places to cycle.</p>	<p>Please see Common Response A.</p>

6 RR-002 ANDY TONKIN

Reference	Relevant Representation	Applicant's Response
RR-002-1	<p>Traffic</p> <p>Concern around access from Wansford onto the A47 with increase traffic flow and the removal of all traffic lights. Concern around additional noise from the projected increase in traffic volumes. Safety concern for traffic joining the A1 northbound from the A47, already a dangerous junction that will likely be made worse by projected additional traffic volumes</p>	<p>Please see Common Response D.</p> <p>4 no. dwellings in Wansford are predicted to experience a minor adverse impact (1.0 to 2.9 dB increase) due to increased traffic flows on the new A47 in the short-term (as shown in section 11.8.47 of Environmental Statement (ES) Chapter 11 (APP-049)). In the long term, all noise changes at dwellings in Wansford are predicted to be negligible. All minor adverse and beneficial impacts are predicted to have absolute noise levels below the Significant Observable Adverse Effect Level (SOAEL) and the long-term impact is predicted to be negligible. As such, these minor impacts are not predicted to have significant noise effects.</p> <p>Table 11-2, Chapter 11 Noise and Vibration (APP-049) shows that the noise level change at Black Swan Spinney, Wansford, PE8 6LE is predicted to be 0.1 dB in the short term, and +0.5 dB in the long term, both of which are negligible and unlikely to be a perceptible change.</p>

7 RR-003 ANTHONY WHITTLE

Reference	Relevant Representation	Applicant's Response
RR-003-1	Permission should be granted for the cycle route as the alternative route along the A47 is too dangerous for cyclists. The reasons for refusal were lacking any planning merit and did not take into account planning policies which seek to encourage cycling. Reasons for refusal were purely subjective with no evidence or reasoning that would support the refusal. Local and Central government have a duty to protect the lives of cyclists and support sustainable transport.	Please see Common Response A.

8 RR-004 BLETSOES ON BEHALF OF DAVID LONGFOOT

Reference	Relevant Representation	Applicant's Response
RR-004-1	These representations are made without prejudice to making further representations for different reasons, or in order to amplify these representations. The current scheme design encompasses the majority of a 12acre arable field, which Mr Longfoot occupies opposite []. We understand that Highways England (HE) intend to acquire the land. The loss of this land will impact negatively on Mr Longfoot's farm business as he will be losing a secure lifetime tenancy over a productive area of arable land.	<p>The Applicant has ensured that the amount of land required is the minimum to deliver the Scheme as shown in the Land Plans (AS-004).</p> <p>The land that Mr Longfoot tenants is critical to the delivery of the Scheme and as such the Applicant needs to acquire it. As a tenant of the land, Mr Longfoot will receive fair and reasonable compensation for his losses and this figure will be agreed through the District Valuer who is impartial.</p>
RR-004-2	HE's proposals seek to stop up one of the main access routes from the A47 to Upton (Upton Road), which is the principal access for Mr Longfoot to reach the A47. Mr Longfoot uses Upton Road to travel from his main holding to land at Castor, which is where the majority of his farming business is based. The alternative route would cause an increased journey time and distance travelled, which will inevitably impact upon the profitability of the farm business, particularly during busy periods. Mr Longfoot believes that the alternative route would add approximately an additional 1.5 miles to each journey when taking machinery to his land at Castor.	Please refer to Common Response E.
RR-004-3	The stretch of road at 'Upton Drift' is extremely narrow and has a ditch on one side of the highway and a banked hedge on the other, making it difficult to get out of the road with any urgency. The poor visibility also makes this section dangerous. We understand that HE have consulted with	Please refer to Common Response F.

Reference	Relevant Representation	Applicant's Response
	<p>County Highways and Milton Estate in order to consider potential improvements to 'Upton Drift'. We understand that there are also plans to make improvements to the junction directly outside Model Farm to ensure vehicles can safely navigate the junction, which is likely to include widening, making signage improvements and vegetation management. The plans suggest there may be passing places along 'Upton Drift' as well as straightening to improve visibility, this will need to be of a sufficient width and length to accommodate agricultural machinery. The section of Langley Bush Road which road users would be required to follow once turning out of the 'Upton Drift' is both winding and narrow, with poor visibility. Much of the metalled road is bordered tightly by vegetation. There would be very little room for agricultural machinery to manoeuvre along this road. This stretch of road is also considered 'fast', and down to the A47 via Langley Bush Road and Sutton Heath Road, which we can forward to you for reference.</p> <p>Mr Longfoot wishes to request that HE consider the option to leave the existing roundabout in situ to then construct additional lanes on the existing A47, opposed to constructing the new road and roundabout as proposed. This would prevent the need to stop up Upton Road access. Mr Longfoot wishes to seek reassurance and confirmation that there will be unimpeded access at all times throughout the construction period for him to travel to and from Upton village where his main farmstead is based. He will need to be informed of any restricted road use or closures in advance and kept fully informed during the construction phase. and in icy conditions it is dangerous. Vegetation</p>	

Reference	Relevant Representation	Applicant's Response
	clearance will be required as well as the inclusion of a sufficient number of passing bays or widening of the road. The junction which leads on to Sutton Heath Road from Langley Bush Road has poor visibility and is potentially dangerous when agricultural machinery is manoeuvring out of the junction. Given the likely increase in the flow of traffic, improvements are required to improve safety. The addition of visible signage would be beneficial. Mr Longfoot has arranged for video footage and photographs to be taken whilst he takes agricultural machinery along the 'Upton Drift'	
RR-004-4	There are concerns surrounding unauthorised access, fly tipping and travellers if the access road to the south of the village were to be stopped up. The provision of new signage would help to mitigate any negative impact.	<p>The Applicant is considering the concerns mentioned and discussing the issues with Peterborough City Council. A meeting was held with the Applicant and Peterborough Council on 23 February 2021 to discuss the Scheme proposals and current antisocial behaviours in the vicinity of the Scheme (the Applicant is looking to develop a Statement of Common Ground with Peterborough City Council where details of these discussions will be included).</p> <p>Consideration will be given to new signage as part of the detailed design.</p>

9 RR-005 BRIAN DICKINSON

Reference	Relevant Representation	Applicant's Response
RR-005-1	My main concern is that the existing access from the A47 to the village should not be closed. The proposed access along Upton Drift is not adequate even with the proposed new passing places and limited widening. There are 3 farms all with tractors and heavy machinery that will need to use this road as well as delivery lorries. It is a single track road and is therefore totally unsuitable. In the winter the bottom floods and snow drifts across usually making it impassable. The dip is also on a bend and it is impossible to see around it. This is already a dangerous road and personally I've had 2 accidents on this bend. With the increase in traffic as well as farm traffic due to the other road being closed, this road will become even more dangerous.	Please refer to Common Response F.

10 RR- 006 CLIMATE EMERGENCY PLANNING AND POLICY

Reference	Relevant Representation	Applicant's Response
RR-006-1	As an independent environmental consultant specialising in science, policy, and law, I object to the A47 Wansford to Sutton (A47WANS) scheme:	
RR-006-2	In regional combination with the Norwich Western link (NWL) road, three other A47 RIS2 schemes (A47 North Tuddenham to Easton, A47 Blofield to North Burlingham, and A47 - A11 Thickthorn Junction), and other schemes, the A47WANS scheme would increase capacity and traffic growth contrary to national policies for climate change, air quality and modal shift towards walking, cycling and public transport.	<p>Please see Common Response I.</p> <p>The Net Zero Strategy: Build Back Greener (published October 2021): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1028157/net-zero-strategy.pdf) was presented to Parliament pursuant to Section 14 of the Climate Change Act 2008. It sets out the next steps to be taken to cut carbon emissions in order to meet the Sixth Carbon Budget (2033 – 2037) and also the UK's 2030 Nationally Determined Contribution for the purposes of the Paris Agreement on Climate Change (described in the Technical Appendix to the Net Zero Strategy publication at pp 309 – 310). The Net Zero Strategy builds on the findings in the latest report by the Intergovernmental Panel on Climate Change (IPCC (2021), 'Sixth Assessment Report', [REDACTED]) and references the role of the Department for Transport's (DfT's) Transport Decarbonisation Plan.</p> <p>The Climate Change Committee's Independent Assessment The UK's Net Zero Strategy [REDACTED] [REDACTED] (October 2021) states "Our overall assessment is that it is an</p>

Reference	Relevant Representation	Applicant's Response
		<p>ambitious and comprehensive strategy that marks a significant step forward for UK climate policy, setting a globally leading benchmark to take to COP26. Further steps will need to follow quickly to implement the policies and proposals mapped out in the Net Zero Strategy if it is to be a success". The Climate Change Committee notes that <i>"A zero emission vehicle mandate will be the key delivery tool for electric vehicles, as recommended by the Committee"</i> and <i>"The Transport Decarbonisation Plan is a reasonably comprehensive strategy for transitioning to a system in which almost all journeys are zero-carbon."</i> Since the majority of operational greenhouse gas (GHG) emissions from the Scheme will be from tail pipes rather than the infrastructure for which development consent is sought, it is material that there are up-to-date Government policies and strategies that seek to provide the pathway to delivering net zero by 2050. The Climate Change Committee's green/yellow/orange/red analysis of UK Climate Policy – State of Play (Table 2 at page 28 of the Independent Assessment – link above) identifies that in respect of domestic transport, including domestic aviation and shipping, green (signalling "good plans") applies to publishing of the plans to achieve net zero, sufficient ambition and proper funding and/or incentives. It has allocated yellow ("generally good plans with some risks") to credible delivery policies, balanced mix of options and timelines for implementation. There are no orange ("more risks") or red ("significant risks") classifications identified in respect of domestic transport.</p> <p>The Climate Change Committee describes the key actions in the coming years in respect of implementing the Transport</p>

Reference	Relevant Representation	Applicant's Response
		<p>Decarbonisation Plan as follows <i>"This [Transport Decarbonisation Plan] included a clear roadmap for delivering the transition to electric vehicles, based on a zero-emission vehicle mandate. Phase-out dates for other types of non-zero-emission road vehicles have also been proposed, sending clear signals to the market. Alongside this, there is recognition of the need to reduce road traffic growth, supported by spending commitments on active travel and public transport. These now need to be turned into measurable targets and clear delivery policies to achieve this ambition."</i></p> <p>Neither a reduction in road traffic growth or achieving net zero are incompatible with the need for the Scheme. Indeed, the Transport Decarbonisation Plan provides clear policy recognition that there is a need for further road investment: <i>"In 2019, our roads handled 88 per cent of all passenger travel by distance, the vast majority of it by car or van. Even doubling rail use across the country would only reduce this proportion to 75 per cent, assuming that overall demand did not rise. The roads also carry more than three-quarters of freight traffic, and of course nearly all pedestrian, cycling, bus and coach journeys. Continued high investment in our roads is therefore, and will remain, as necessary as ever to ensure the functioning of the nation and to reduce the congestion which is a major source of carbon."</i> (page 103).</p> <p>Cumulative impacts for all the disciplines considered in the environmental impact assessment, including biodiversity, ecology, air quality, noise and carbon emissions are considered in Environmental Statement (ES) Chapter 15:</p>

Reference	Relevant Representation	Applicant's Response
		<p>Cumulative Effects Assessment (AS-018). Chapter 15 has been completed in accordance with the requirements of the Infrastructure Planning Environmental Impact Assessment (EIA) Regulations 2017 and Planning Inspectorate Advice Note Seventeen. Other developments were included as part of the cumulative assessment methodology and this is detailed in section 15.3 of the Chapter. As per Table 15-2 in section 15.3, the construction and operational phase traffic data includes traffic associated with other developments, so the greenhouse gas emissions assessment reported within the Chapter 14 Climate (APP-052) is inherently cumulative. In accordance with Department for Transport (DfT) Transport Appraisal Guidance, the uncertainty log includes the management of the uncertainties required for formulating the core scenario. The uncertainty log contains the significant local authority and Highways England network schemes. Based on Transport Appraisal Guidance, the schemes included in the Do-Minimum (DM) scenario have a likelihood of at least 'near certain' or 'more than likely'. Therefore, other schemes such as the other A47 schemes and the NWL, are listed in the uncertainty log as 'near certain' or 'more than likely' and as such it is included in the core scenario.</p> <p>The Net Zero Strategy and the Transport Decarbonisation Plan set out a wide range of mechanisms outside of the planning system that are proposed to be utilised to deliver the net zero by 2050 target and the shift to zero emission road transport. In considering whether or not to grant consent for a development, a decision maker is entitled to assume that other regimes will operate effectively: <i>Gateshead MBC v Secretary of State for the Environment</i> [1995] Env. L.R. 37.</p>

Reference	Relevant Representation	Applicant's Response
		<p>The Transport Decarbonisation Plan recognises that there are uncertainties and a need to continue to develop and refine the range of policies and proposals to ensure that the transport sector fulfils its contribution to the legally binding climate targets, with Government taking such additional targeted action as is needed to enable the targets to be met "We will regularly review progress against our targets, and continue to adapt and take further action if needed" (page 92).</p> <p>With regards to air quality, the health assessment as presented in Environmental Statement (ES) Chapter 12 Population and Human Health (AS-016) follows guidance in LA112 which states that information gathered for other environmental factors, such as air quality should be used to help identify change to health determinants. Table 12-18 in Chapter 12 (AS-016) concludes Neutral residual effects on human health in terms of air quality and summarises the reasons behind this. The details are presented in ES Chapter 5 Air Quality (APP-043).</p> <p>The air quality assessment predicted concentrations at all human health receptors to be below the Air Quality Strategy objective (AQO) of 40 µg/m³. Overall, 14 of the 22 receptors are expected to show a deterioration in air quality, with 7 showing an improvement in air quality with the Scheme in place. 1 receptor is predicted to experience no change in air quality. All predicted air quality concentrations are below the AQO. The air quality assessment has concluded there would be no significant effects on air quality at human receptors as</p>

Reference	Relevant Representation	Applicant's Response
		a result of the Scheme.
RR-006-3	Data, assumptions and projections in the traffic and economic modelling do not take account of the impact of the Covid 19 pandemic on travel patterns and road capacity need.	<p>The traffic modelling and economic appraisal for the Scheme were undertaken in accordance with the Department for Transport (DfT) Transport Appraisal Guidance (TAG).</p> <p>No updates have been published by the DfT with regards to the impact on the traffic growth caused by COVID-19. As discussed in the Case for the Scheme (Section 5: Economic Case Overview) (AS-022), in assessing the value for money of the Scheme, the analysis includes high and low growth traffic sensitivity tests. Under the low growth scenarios (which potentially acts as a proxy for uncertainties such as the impact of COVID-19) the Scheme still represents medium value for money.</p>
RR-006-4	The Environmental Statement does not comply with the EIA Regulations as no cumulative assessment of carbon emissions has been made with other existing and/or approved projects. This compliance failure is across all types of emissions including construction/embedded, operation and maintenance, and operation road -user emissions.	<p>Please see Common Response I.</p> <p>The National Networks National Policy Statement (NN NPS) and Design Manual for Roads and Bridges LA114 Climate (DMRB LA114) require that the assessment of significance of effects on climate for Development Consent Order (DCO) applications should be undertaken at the national level, which is the basis of the UK Government's legally binding carbon budgets.</p> <p>The methodology set out in DMRB LA 114 (Climate) follows this approach. It should be noted that paragraph 2.6 of DMRB 114 advises that the assessment and reporting of the effects of climate shall be undertaken in accordance with the requirements in four over-arching environmental assessment</p>

Reference	Relevant Representation	Applicant's Response
		<p>documents. Environmental Statement (ES), Chapter 14: Climate (APP-052) complies with the requirements set out in these documents, which themselves align with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) and the National Networks National Policy Statement (NNNPS) 2014. In particular, one of the four over-arching environmental assessment documents is DMRB LA 104 Environmental assessment and monitoring. DMRB LA 104 includes a series of definitions and requirements relating to cumulative assessment that have direct application to each of the individual environmental factors, including climate.</p> <p>The LA104 standard provides a definition of cumulative assessment as: Impacts that result from incremental changes caused by other present or reasonably foreseeable actions together with the project. NOTE: For the purposes of this guidance, a cumulative impact can arise as the result of:</p> <ul style="list-style-type: none"> a) the combined impact of a number of different environmental factors - specific impacts from a single project on a single receptor/resource; and/or b) the combined impact of a number of different projects within the vicinity (in combination with the environmental impact assessment project) on a single receptor/resource. <p>It sets out the expectation that <i>“Environmental assessments shall assess cumulative effects which include those from:</i></p> <ul style="list-style-type: none"> 1) <i>a single project (e.g. numerous different effects impacting a single receptor); and</i>

Reference	Relevant Representation	Applicant's Response
		<p>2) <i>different projects (together with the project being assessed).</i>"</p> <p>A 'single project' cumulative assessment is inherent within the LA 114 climate methodology as it considers embedded construction and maintenance, and user tailpipe emissions. A cumulative assessment of 'different projects (together with the project being assessed)' is inherently within the climate methodology through:</p> <ol style="list-style-type: none"> 1) Inclusion of the project and other locally committed development within the traffic model (see the Transport Assessment Section 6.6. (AS-024)); and 2) Consideration of the project against the UK carbon budgets, which are inherently cumulative as they consider and report on the carbon contributions across all sectors. <p>In particular, the assessment in the ES Chapter 14: Climate (APP-052) has included such information as is reasonably required to assess the significance of the environmental effects of the development and which the Applicant could reasonably be required to compile having regard to current knowledge.</p> <p>Since only Government is in the position to identify cumulative targets, the current knowledge available to the Applicant comprises the national targets set out in the carbon budgets. No sectoral target has been set by Government for road transport. As a result, there is no target for the road transport sector against which the Applicant can carry out a</p>

Reference	Relevant Representation	Applicant's Response
		<p>cumulative assessment that aggregated greenhouse gas (GHG) emissions from the Scheme with those from any particular category of developments in order to determine likely significance of effects. Accordingly, a cumulative assessment against a target for the road transport sector is not a matter which the Applicant could reasonably be expected to be required to compile having regard to current knowledge. Further, it is not possible to attribute a specific local emission of carbon to effects on a local receptor so, unlike other cumulative impact assessments such as landscape, there is no logical study area capable of definition by the nature of the effect itself.</p> <p>The approach in LA114 and in ES Chapter 14: Climate (APP-052) of assessment against the national Carbon Budget targets, which span cumulative economic sectors, is correct. A detailed assessment of the embodied carbon through the construction, operation and maintenance has been undertaken using the Highways England Carbon Tool and following the methodology within the associated guidance document. The DfT's Transport Appraisal Guidance Green House as methodology was followed to calculate end user emissions.</p> <p>As well as reporting estimated emissions associated with the Scheme, Section 14.9 of ES Chapter 14 Climate (APP-052) highlights carbon mitigation opportunities taken forward during design and further opportunities to reduce emissions during construction. Section 4.8 'Walking, Cycling and Horse-riding (WCH) Assessment' of the Case for the Scheme (AS-022) and 4.9 demonstrate how the Scheme would provide</p>

Reference	Relevant Representation	Applicant's Response
		<p>new WCH facilities, improve accessibility for users in the local area and provide the opportunity to choose active travel modes (e.g. walking, cycling, etc.). Section 5.4 of the Case for Scheme also reports neutral impacts on public transport.</p> <p>Cumulative impacts for all the disciplines considered in the environmental impact assessment, including biodiversity, ecology, air quality, noise and carbon emissions are considered in ES Chapter 15: Cumulative Effects Assessment (AS-018). Chapter 15 has been completed in accordance with the requirements of the Infrastructure Planning Environmental Impact Assessment (EIA) Regulations 2017 and Planning Inspectorate Advice Note Seventeen. Other developments were included as part of the cumulative assessment methodology and this is detailed in section 15.3 of the Chapter. As per Table 15-2 in section 15.3, the construction and operational phase traffic data includes traffic associated with other developments, so the greenhouse gas emissions assessment reported within the Chapter 14 Climate (APP-052) is inherently cumulative. In accordance with Department for Transport (DfT) Transport Appraisal Guidance, the uncertainty log includes the management of the uncertainties required for formulating the core scenario. The uncertainty log contains the significant local authority and Highways England network schemes. Based on Transport Appraisal Guidance, the schemes included in the Do-Minimum (DM) scenario have a likelihood of at least 'near certain' or 'more than likely'. Therefore, other schemes such as the other A47 schemes and the NWL, are listed in the uncertainty log as 'near certain' or 'more than likely' and as such it is included in the core scenario.</p>

Reference	Relevant Representation	Applicant's Response
RR-006-5	In-combination, and cumulative impacts, for biodiversity, ecology, and air quality have not been assessed with other road infrastructure schemes locally and in the region. The recent judgement of Pearce v Secretary of State BEIS [2021] demonstrates that the Courts accept the importance of cumulative environmental impact assessment.	<p>Cumulative impacts for all the disciplines considered in the environmental impact assessment, including biodiversity, ecology, air quality, noise and carbon emissions, are presented in Environmental Statement (ES) Chapter 15: Cumulative Effects Assessment (AS-018). Chapter 15 has been completed in accordance with the requirements of the Infrastructure Planning Environmental Impact Assessment (EIA) Regulations 2017 and Planning Inspectorate Advice Note Seventeen. Other developments were included as part of the cumulative assessment methodology and this is detailed in section 15.3 of the Chapter.</p> <p>The Applicant has provided sufficient information on likely significant environmental effects to enable the Secretary of State to evaluate such effects and take them into account in the determination of the Development Consent Order (DCO) application. Neither the NN NPS or the Applicant propose that a further assessment of likely significant effects should take place at a later stage and so the circumstances considered in Pearce v Secretary of State for Business, Energy and Industrial Strategy [2021] EWHC 326 do not arise.</p>
RR-006-6	Guidance on assessing carbon emissions under the EIA Regs strongly recommends cumulative assessment locally, regionally (ie: including in-combination effects with other A47, RIS2 and local schemes above), and nationally (ie: with up to 100 other schemes planned by Government, including under RIS2. This has not been done.	<p>Please refer to response to RR-006-4.</p> <p>In terms of the assessment of likely significant effects, the Environmental Impact Assessment (EIA) Regulations 2017 do not stipulate how or at what level the likely significance of carbon emissions are required to be assessed by a decision-maker nor do they define what is and what is not significant.</p>

Reference	Relevant Representation	Applicant's Response
		<p>The codifying European Directive 2011/92/EU (as amended by Directive 2014/52/EU) transposed by the EIA Regulations 2017 leaves it to individual member states to determine within their respective jurisdictions what constitutes a likely significant effect (in accordance with the principle of subsidiarity). As a matter of policy, Parliament has required that in the case of National Networks NSIPs the assessment of significance shall be undertaken in the context of the ability of Government to meet its carbon reduction targets.</p> <p>The Applicant has had regard to all relevant policy and guidance. Of greatest weight for the determination of the DCO application is the NNNPS, which advises that the significance of carbon emissions is to be assessed in the context of the national carbon budgets. The standard approach set out in the Design Manual for Roads and Bridges (DMRB) LA 114 is intended to ensure that the Examining Authority (ExA) and Secretary of State have the necessary information to consider the likely significance of greenhouse gas emissions and other climate matters. In the absence of carbon budgets adopted at a sectoral, regional or local level there is no other framework within which the likelihood of a significant effect could be identified and assessed. In the absence of a framework, an aggregation of predicted emissions from any particular grouping of projects would simply be an aggregation of numbers, without a context within which an effect could be determined as significant or not. As explained in response RR-0006-4, the carbon budgets provide a context that is directly connected to pan-economy activity, Government policy and the legal obligation to achieve net zero by 2050 in accordance with the Climate</p>

Reference	Relevant Representation	Applicant's Response
		Change Act 2008. The Applicant has provided all the information required under the EIA Regulations, the NNNPS and DMRB LA 114 to determine whether or not greenhouse gas emissions would give rise to likely significant effect on climate.
RR-006-7	Carbon emissions should be tested against the UK obligations under the Paris agreement including the UK's Nationally Determined Contribution (NDC), the legally binding target under the Climate Change Act 2008 to meet net-zero carbon emissions by 2050, the UK Sixth Carbon Budget (6CB), science-based carbon budgets from the UK Tyndall Centre, the NPPF 148 planning requirement to "radical reductions of greenhouse gas emissions", the statutory duty on Highways England under the Infrastructure Act 2015 section 5(2) to have regard for the environment, and the NCC Environmental Policy.	<p>Please refer to Common Response I, RR-006-2, RR-006-4 and RR-006-6.</p> <p>The Carbon Budget Order 2021, which provides for the Sixth Carbon Budget, took effect on 24 June 2021. The Applicant can only undertake an assessment of the likely significant effect of carbon (defined to include greenhouse gases) emissions against published Government policy. The Applicant is not responsible for producing the UK carbon budgets, which are set by the Government in response to recommendations from the UK Climate Change Committee.</p> <p>The Committee's recommendations informed the development of the Sixth Carbon Budget. Government has an array of policy tools and levers available to meet current and future carbon budgets.</p> <p>Since the Development Consent Order (DCO) application was prepared, the Government has issued the Policy paper "The Ten Point Plan for a Green Industrial Revolution"; communicated its new Nationally Determined Contribution (NDC) under the Paris Agreement to the United Nations Framework Convention on Climate Change; in its press release of 20 April 2021 that announced the Sixth Carbon Budget, confirmed that it is developing an approach to</p>

Reference	Relevant Representation	Applicant's Response
		<p>securing net carbon reduction that is committed to innovation; and in July 2021 issued its Transport Decarbonisation Plan that confirmed that in 2050 people will still drive on improved roads, but increasingly in zero emission cars.</p> <p>In accordance with section 104 of the Planning Act 2008 the Secretary of State is required to determine the application in accordance with the NNNPS unless one or more of subsections (4) to (8) apply. Subsection (4) "applies if the Secretary of State is satisfied that deciding the application in accordance with any relevant national policy statement would lead to the United Kingdom being in breach of any of its international obligations". It is relevant in this respect to note that:</p> <ul style="list-style-type: none"> - The UK confirmed its Nationally Determined Contribution (NDC) under the Paris Agreement to the United Nations Framework Convention on Climate Change (UNFCCC) in December 2020. The NDC commits the UK to reducing economy-wide greenhouse gas emissions by at least 68% by 2030, compared to 1990 levels. - The NDC aligns with the legislated UK carbon reduction target in the 6th Carbon Budget, which, by setting a carbon budget for the period 2033 to 2037 of 965 MtCO₂e, will achieve an emissions reduction of 78% by 2035 compared to 1990 levels. - As presented in Environmental Statement (ES) Chapter 14 (APP-052) the climate assessment will not impact the UK achieving its carbon reduction targets. In turn it can therefore be concluded that there are no implications of the

Reference	Relevant Representation	Applicant's Response
		<p>development in relation to the Paris Agreement and the UK's Nationally Determined Contribution under the Paris Agreement.</p> <p>This conclusion is consistent with the Climate Change Committee's Independent Assessment, which states that the Net Zero Strategy "sets out sectoral ambitions that add up to a quantified pathway to meet the UK's Nationally Determined Contribution (NDC) for 2030 and the Sixth Carbon Budget covering the mid-2030s." Accordingly, the Applicant does not consider that there is a reasonable basis on which it could be concluded that the climate effects of the Scheme would invoke section 104(4).</p>
RR-006-8	The NPS requires that the scheme is assessed against national carbon reduction targets and the UK's international commitments in place at the time when a DCO application is determined.	Please refer to Common Response I and RR-006-7.

11 RR-007 DAVID JOHNSON

Reference	Relevant Representation	Applicant's Response
RR-007-1	Highways England has ignored the views of local people in selecting a more southerly route than the Option selected by the people, at an anticipated additional cost of more than £6M	<p>A road entirely north of the existing A47 is not feasible due to the location and extent of the Scheduled Monument.</p> <p>Feedback to the statutory consultation resulted in a change to the alignment, and a route north of the existing A47 at the eastern end of the Scheme between Sutton Heath Road and the A47/Nene junction has been developed.</p> <p>Following discussions with Historic England the proposed alignment now passes through the southeast corner of the scheduled monument.</p>
RR-007-2	Highways England has not adequately managed to access from the Old North Road on to the Western round-a-bout. Several options have been proposed by local people, and all ignored.	<p>Paragraph 1.2.14 of the Transport Assessment (AS-024) summarises the initial option identification work. Further details can be found in the A47 Wansford to Sutton Scheme Assessment Report (SAR) (2018) (AS-031).</p> <p>Please refer to Common Response D.</p>
RR-007-3	Historic England has not proven that the area of the so-called 'scheduled monument' has any archaeological value at all. Not trenches dug, and no proper survey. Local farmers know that the area has been deep ploughed, land drains installed and not a shred of evidence has been unearthed.	<p>As the asset is designated as a Scheduled Monument under the Ancient Monuments and Archaeological Areas Act 1979, the title used in the Environmental Statement (ES) is entirely accurate. A narrative summary of the evidence is given in Section 6.2 of the ES Chapter 6 Cultural Heritage (APP-044). Further information is available in the Historic England scheduling text, available at</p> <p>[REDACTED]</p>

12 RR-008 FIGHT4UPTON

Reference	Relevant Representation	Applicant's Response
RR-008-1	<p>Objection to A47 dualling Sutton to Wansford Scheme. We object to this application on three grounds:</p> <ol style="list-style-type: none"> 1. Lack of consultation with Upton village and surrounding rural area. The 3 options in the statutory consultation did not involve severing Upton Main Road. 2. The plans are unsafe for Upton Drift and Langley Bush Road 3. The plans sever historical links for pedestrians, cyclists and horse-riders with Sutton, Castor & Ailsworth. 	<p>This response is noted, and responses are provided below to the individual concerns in the separate boxes of the table relating to RR-008-2, RR-008-3, RR-008-4.</p> <p>Please note, this is the same response as RR-009 and RR-020 as the same representation has been submitted by each party.</p>
RR-008-2	<p>1. Lack of consultation with Upton village and surrounding rural area. The 3 options in the statutory consultation did not involve severing Upton Main Road. In 2017 Highways England issued a preferred route document [] It listed three options and a preferred route. Non of the routes identified involved the moving of the Sutton roundabout or the severing of Uptons access road. For this reason Upton village and farms did not actively participate in the statuary consultation process. In fact the brochure (here) for this consultation had a comprehensive design that did not materially impact Upton. Then in July 2020 the village heard a rumour of the Upton road being severed. We contacted Highways England who told a village meeting of this plan (when would we have been told if we hadn't asked?). The meeting was only open to residents (one per household) of the village and did not include the tenant farmers or Milton Estate, the main land owner. In the meeting a google map was</p>	<p>Please refer to Common Response E.</p>

Reference	Relevant Representation	Applicant's Response
	<p>projected on a screen and [] pointed at the proposed new route. We had no plan, no papers. We were then asked to vote on the following:</p> <ol style="list-style-type: none"> 1. The proposal to close Upton road and have one access along Langley Bush Road (LBR) and The Drift. 2. To divert all traffic from Sutton Heath Road (SHR) and LBR through Upton and to the current roundabout location on the A47. With no written plans, no time to consider the implications we were pressed in to a vote. <p>The village voted for option 1. On reflection the village realised that this was a sham vote for the following reasons:</p> <ol style="list-style-type: none"> 1. Not all landowners, tenants and resident's were allowed to attend the meeting or had notice of the meeting. 2. No notice of the plans in advance and time to consider the implications. 3. Voting for option 1 was on the assurance from Highways England that LBR and The Drift would be improved to two way roads (this is now being denied) 4. The options presented were not the only options available and in fact we believe option 2 above was never on the table. 	
RR-008-3	<p>The plans are unsafe for Upton Drift and Langley Bush Road Currently the majority of traffic to and from the village and farms is along Upton Road. The local traffic avoids The Drift and LBR because it is narrow and has blind bends caused by hedgerows and over-grown verges. The road is used by cyclists, pedestrians and horse riders as well as cars, lorries and agricultural vehicles. Forcing all traffic to use The Drift and LBR will lead to congestion at peak times and there is no safe separation for pedestrians, cyclists and</p>	<p>Please refer to Common Response F.</p> <p>Figure 6 1 in Section 6.2 of the Transport Assessment (AS-024) shows the extent of the Wansford Transport Model (WTM) study area used for the assessment of the Scheme. The WTM covers the strategic traffic movements across the A47 corridor between Wansford and Peterborough. To the north the buffer area of the model extends to the towns of</p>

Reference	Relevant Representation	Applicant's Response
	<p>horse-riders. Langley Bush Road is very dangerous for these users. (Currently separation on Upton Road is achieved through wide verges) No account has been taken in traffic modelling for the extra traffic from North of Peterborough that will use this route to the A47 after the project. Human nature is that people will be attracted to this route as the dangerous SHR junction has gone. We believe traffic volume will be substantially higher than estimated. Many residents in Upton have had accidents over the years along these roads. The roads are too narrow for modern agricultural vehicles and lorries to pass.</p>	<p>Sleaford and Grantham. The model is therefore capable of assessing the wider area traffic patterns along Langley Bush Road.</p> <p>Section 7.12.7 of the Transport Assessment (AS-024) describes the road safety benefits of the Scheme. The COBA-LT analysis demonstrates that the Scheme improves road safety overall by reducing the numbers of accidents and consequently the number of casualties. The Scheme improves safety along the A47 by providing upgraded dual carriageway alignment and a separate A1 eastbound off-slip. In total, over a 60-year timeframe, the Scheme's improvements will save a total of 265 casualties and 42 KSIs (killed or seriously injured) (Table 7-16).</p>
RR-008-4	<p>The plans sever historical links for pedestrians, cyclists and horse-riders with Sutton, Castor & Ailsworth The five parishes (Upton, Sutton, Castor, Ailsworth, Marholm) have had historical links as communities together with Milton since the 16th century (as evidenced by the book published by the CAMUS project in 2000) This project nearly doubles the distance for cycling/walking from Upton to Sutton, an additional 1.62km (from 1.92km to 3.54km). LBR is Dangerous for pedestrians, horses and cyclists as there is no separation, no escape route if two large lorries or agricultural vehicles pass. Moreover there are no plans currently for a bridge or underpass and so pedestrians and cyclists will have to negotiate across a busy dual carriageway / roundabout. The reality is that this won't be</p>	<p>Movement is still enabled for pedestrians, cyclists and horses and the historic context is not obscured, as it is preserved in the historical record.</p> <p>Please refer to Common Responses C and F. These issues are discussed further in RR-011-2.</p>

A47 Wansford to Sutton Dualling

Applicant's Response to Relevant Representations

Reference	Relevant Representation	Applicant's Response
	safe or palatable to many people and so the community links will be severed.	

13 RR-009 GAVIN ELSEY

Reference	Relevant Representation	Applicant's Response
RR-009-1	<p>Objection to A47 dualling Sutton to Wansford Scheme. I am the City Councillor for the whole area this scheme impacts and especially those residents of Upton. I object to this application on three grounds:</p> <ol style="list-style-type: none"> 1. Lack of consultation with Upton village and surrounding rural area. The 3 options in the statutory consultation did not involve severing Upton Main Road. 2. The plans are unsafe for Upton Drift and Langley Bush Road 3. The plans sever historical links for pedestrians, cyclists and horse-riders with Sutton, Castor & Ailsworth <p>Detailed explanation:</p>	<p>Responses to the individual concerns are provided below in RR-009-2, RR-009-3 and RR-009-4.</p> <p>Please note, this is the same response as RR-008 and RR-020 as the same representation has been submitted by each party.</p>
RR-009-2	<p>Lack of consultation with Upton village and surrounding rural area. The 3 options in the statutory consultation did not involve severing Upton Main Road. In 2017 Highways England issued a preferred route document [] It listed three options and a preferred route. Non of the routes identified involved the moving of the Sutton roundabout or the severing of Uptons access road. For this reason Upton village and farms did not actively participate in the statutory consultation process. In fact the brochure [] for this consultation had a comprehensive design that did not materially impact Upton. Then in July 2020 the village heard a rumour of the Upton road being severed. They contacted Highways England who told a village meeting of this plan (when would they have been told if they hadn't asked?). The meeting was only open to residents (one per household) of</p>	<p>Please see ` Response E.</p>

Reference	Relevant Representation	Applicant's Response
	<p>the village and did not include the tenant farmers or Milton Estate, the main land owner. In the meeting a google map was projected on a screen and Highways England, [] pointed at the proposed new route. They had no plan, no papers. They were then asked to vote on the following: The proposal to close Upton road and have one access along Langley Bush Road (LBR) and The Drift. To divert all traffic from Sutton Heath Road (SHR) and LBR through Upton and to the current roundabout location on the A47. With no written plans, no time to consider the implications they were pressed in to a vote.</p> <p>The village voted for option 1. On reflection the village realised that this was a sham vote for the following reasons: Not all landowners, tenants and resident's were allowed to attend the meeting or had notice of the meeting. Nor were the city councillors. No notice of the plans in advance and time to consider the implications. Voting for option 1 was on the assurance from Highways England that LBR and The Drift would be improved to two way roads (this is now being denied) The options presented were not the only options available and in fact we believe option 2 above was never on the table.</p>	
RR-009-3	<p>The plans are unsafe for Upton Drift and Langley Bush Road Currently the majority of traffic to and from the village and farms is along Upton Road. The local traffic avoids The Drift and LBR because it is narrow and has blind bends caused by hedgerows and over-grown verges. The road is used by cyclists, pedestrians and horse riders as well as cars, lorries and agricultural vehicles. Forcing all traffic to use The Drift and LBR will lead to congestion at peak times</p>	<p>Please refer to Common Responses E and F.</p> <p>Section 7.12.7 of the Transport Assessment (AS-024) describes the road safety benefits of the Scheme. The COBA-LT analysis demonstrates that the Scheme improves road safety overall by reducing the numbers of accidents and consequently the number of casualties. The Scheme</p>

Reference	Relevant Representation	Applicant's Response
	and there is no safe separation for pedestrians, cyclists and horse-riders. Langley Bush Road is very dangerous for these users. (Currently separation on Upton Road is achieved through wide verges) No account has been taken in traffic modelling for the extra traffic from North of Peterborough that will use this route to the A47 after the project. Human nature is that people will be attracted to this route as the dangerous SHR junction has gone. We believe traffic volume will be substantially higher than estimated. Many residents in Upton have had accidents over the years along these roads, but these aren't taken into consideration in the modelling as unless they are reported to the police there is no official record. The roads are too narrow for modern agricultural vehicles and lorries to pass.	improves safety along the A47 by providing upgraded dual carriageway alignment and a separate A1 eastbound off-slip. In total, over a 60-year timeframe, the Scheme's improvements will save a total of 265 casualties and 42 KSIs (killed or seriously injured) (Table 7-16).
RR-009-4	The plans sever historical links for pedestrians, cyclists and horse-riders with Sutton, Castor & Ailsworth The five parishes (Upton, Sutton, Castor, Ailsworth, Marholm) have had historical links as communities together with Milton since the 16th century (as evidenced by the book published by the CAMUS project This project nearly doubles the distance for cycling/walking from Upton to Sutton, an additional 1.62km (from 1.92km to 3.54km). LBR is Dangerous for pedestrians, horses and cyclists as there is no separation, no escape route if two large lorries or agricultural vehicles pass. Moreover there are no plans currently for a bridge or underpass and so pedestrians and cyclists will have to negotiate across a busy dual carriageway / roundabout. The reality is that this won't be safe or palatable to many people and so the community links will be severed.	Movement is still enabled for pedestrians, cyclists and horses and the historic context is not obscured, as it is preserved in the historical record. Please refer to Common Responses C and F. These issues are discussed further in RR-011-2.

A47 Wansford to Sutton Dualling

Applicant's Response to Relevant Representations

14 RR-010 GRAHAM GARNER

Reference	Relevant Representation	Applicant's Response
RR-010-1	Problems with western roundabout.	Please refer to Common Response D.

15 RR-011 HELEN DALY

Reference	Relevant Representation	Applicant's Response
RR-011-1	<p>I am sorry I cannot navigate the planning portal for this objection so I am emailing directly.</p> <p>Upton is part of the original 5 Parishes of Castor, Ailsworth, Upton, Sutton and Marholme. Indeed there is a book written on the History of the 5 Parishes.</p> <p>I have 3 objections to the blocking of the direct route via Upton Road to the roundabout at Sutton, giving direct access from Upton to Sutton, Ailsworth, and onto Castor.</p>	
RR-011-2	<p>Sense of place</p> <p>The current plan cuts the small hamlet of Upton off from its historic and important travel corridors between the villages that have existed since prehistory.</p> <p>Dr Stephen Upex reports for the Ailsworth and Castor Neighbourhood plans. demonstrates a direct road link existed in Roman times between Ermine Street and King road allowing direct links between the villages:</p> <p>“A second Roman road called King Street (RCHM 1969, 39) leads off from Ermine Street and heads north, ultimately forming the late Saxon estate and parish boundary between Ailsworth and Upton before it leaves the area and heads into Lincolnshire and ultimately Lincoln. “</p> <p>These connections were cemented by the establishment of the minster church at Castor, St Kyneburgha.</p>	<p>The line of King Street is not affected by the Scheme.</p> <p>While Ermine Street is no-longer extant as a road, the route is visible in the form of field boundaries. There is a potential for archaeological remains related to the former Roman road to be present in the immediate vicinity of the asset. Potential impacts on this asset are set out in Environmental Statement (ES) Chapter 6 Cultural Heritage (APP-044) and ES Appendix 6.1 (APP-085). The links referenced in the representation are already severed by the existing A47 to the extent that they would be after construction of the Scheme, save for the additional impacts described in ES Chapter 6 (APP-044).</p> <p>Movement is still enabled for pedestrians, cyclists and horses and the historic context is not obscured, as it is preserved in the historical record.</p>

Reference	Relevant Representation	Applicant's Response
	<p>"The idea that the areas of the parishes of Ailsworth, Sutton, Upton Milton and Castor all formed part of a large Saxon estate centred on the minster church that developed at Castor is now well developed (Courtney, 1976, Lumley Prior 2014). The layout of the boundaries of these parishes, which is shown in Figure 5 is interesting as the outer boundary appears to have been created as a continuous circuit and must hint at a unified land area within the lines Upex, S</p> <p>"Some Comments and Observations on the Medieval and Early Modern Landscapes of Ailsworth, Castor and Milton"</p> <p>In modern times Farmers, school children, and local people have used the Upton Road to access fields on the south side of the A47, and the local school and facilities at Castor</p> <p>This proposal directly cuts the link between the villages.</p> <p>Peterborough, in particular, has seen rapid growth over the past 50 years. This has led to significant issues. Outlined most recently in: Peterborough City Council Peer Challenge Report July 2021, LGA. Sense of Place was recognised as a significant issue for the authority.</p> <p>"With all councillors and partners engaged you should clarify a vision for place".</p> <p>In the few areas where there remains a sense of place it seems almost deliberately violent to irrevocably, try and weaken those links, by destroying local travel corridors.</p>	<p>As stated in ES Chapter 7 (Landscape) (APP-045), Table 7.1 'Summary of proposed scope', the Scheme alignment does not coincide directly with any urban areas. The Scheme alignment does pass close to the settlements of Wansford and Sutton, however physical change to the settlements would be limited and visibility of the Scheme is limited, therefore it would not affect urban setting or sense of place.</p> <p>Please refer to Common Response C.</p>

Reference	Relevant Representation	Applicant's Response
RR-011-3	Environmental At a time of emphasis on climate change it doesn't make sense, or good planning to be extending local travel corridors that have existed for thousands of years. Travel Networks that have remained because: they make sense.	<p>Please refer to Common Response I.</p> <p>Environmental Statement Chapter 2 - The Scheme (AS-012) details that the Wansford to Sutton section of the A47 is one section of the A47 that is not dual carriageway and this section acts as a bottleneck, resulting in congestion, leading to longer journey times and a poor safety record.</p> <p>The benefits of the A47 Wansford to Sutton Dualling are summarised below:</p> <ul style="list-style-type: none"> • The A47 Wansford to Sutton Dualling will help support economic growth through improved journey times and journey time reliability. • The A47 Wansford to Sutton Dualling will improve road safety for all road users by designing to modern highway standards appropriate for a major A road. • The A47 Wansford to Sutton Dualling will increase the resilience of the A1 / A47 junction to cope with incidents such as collisions, breakdowns, maintenance and extreme weather. • The improved A47 section from Wansford to Sutton will be more reliable, reducing journey times and providing capacity for future traffic growth. • The A47 Wansford to Sutton Dualling ensures the proposals take into account the local communities access to the road network, and provide a safer route between the communities for walking, cycling, horse-riding and other road users.

A47 Wansford to Sutton Dualling

Applicant's Response to Relevant Representations

Reference	Relevant Representation	Applicant's Response
RR-011-4	Safety. Farmers will be forced to use a longer stretch of dual carriageway to take farm machinery to reach there (sic) fields on opposite sides of the A47 and the remaining access road to other fields is very narrow, longer and with only 3 passing places.	Please refer to Common Response F.

16 RR-012 HELEN FACER

Reference	Relevant Representation	Applicant's Response
RR-012-1	<p>As a resident of Sutton village I and my property will be impacted by the proposed redevelopment of the A47 between Wansford and Sutton.</p> <p>My primary concern has been around the proposed route, how it impacts access to and from Sutton village, noise and light pollution that the new road may cause as well as negative impact on the flood plain and habitat along the riverbank.</p> <p>Keeping the proposed new dual carriageway to the North of the current A47 has always been the preferred option by the majority of villagers and minimising adverse impact on the village is my interest.</p>	<p>Paragraph 11.8.47 in Environmental Statement (ES) Chapter 11 (APP-049) states that four dwellings in Wansford and 29 dwellings in Sutton are predicted to experience a minor adverse impact (1.0 to 2.9 dB increase) due to increased traffic flows on the new A47 in the short-term. In the long term, all noise changes at dwellings in Sutton are predicted to be negligible. All minor adverse and beneficial impacts are predicted to have absolute noise levels below the Significant Observable Adverse Effect Level (SOAEL) and the long-term impact is predicted to be negligible. As such, these minor impacts are not predicted to have significant noise effects.</p> <p>Section 12.4 in ES Appendix 7.7 Lighting Assessment (APP-098) concludes there to be low potential for obtrusive light on human and ecological receptors as a result of the Scheme lighting layout.</p> <p>ES Chapter 13 Road Drainage and Water Environment Section 13.9.35 (AS-017) shows that any impact to the active floodplain from encroachment of the Scheme footprint is mitigated within the design through the addition of flood compensation areas. This replaces any loss of volume like for like and ensures there is no detriment to the floodplain. This is a requirement of the Environment Agency.</p> <p>Mitigation to minimise effects on ecological habitat is set out in ES Chapter 8 Biodiversity (AS-015) and the Environmental Management Plan (TR010039/APP/7.5 Rev 1). Planting proposals are presented in the Environmental Masterplan</p>

A47 Wansford to Sutton Dualling

Applicant's Response to Relevant Representations

Reference	Relevant Representation	Applicant's Response
		<p>(AS-021).</p> <p>A scheme fully to the north of the existing A47 is not possible due to the location and extent of the Scheduled Monument. Following the statutory consultation in 2018, the Applicant analysed the responses and engaged with key stakeholders fully to understand the feedback received. As a result, changes have been made to the design of the Scheme, including a northern route at the eastern end between Sutton Heath Road and the new Sutton Heath Roundabout.</p>

17 RR-013 HEALTH AND SAFETY EXECUTIVE (HSE)

Reference	Relevant Representation	Applicant's Response
RR-013-1	HSE wishes to raise a representation regarding the following issue: HSE's response to the Section 42 submission included: Will the proposed development fall within any of HSE's consultation distances? 'HSE has reviewed the updated scheme and one major accident hazard pipeline remains within the 'Proposed DCO redline boundary with permanent and temporary land take': HSE ref 7470; 9 feeder Peterborough comp/Huntingdon operated by National Grid. On receipt of your section 56 submission HSE note that we have not received any proposals regarding this issue.	It is agreed that the Scheme falls within a HSE consultation zone. The Applicant understands that National Grid Gas (NGG) will consult with HSE regarding and effects on this asset. NGG will benefit from protective provisions, and it is expected it will have no objection to the Scheme once these are agreed.

18 RR-014 HISTORIC ENGLAND

Reference	Relevant Representation	Applicant's Response
RR-014-1	<p>Historic Environment</p> <p>The Historic Buildings And Monuments Commission for England (HBMCE) is better known as Historic England, and we are the Government's adviser on all aspects of the historic environment in England, including historic buildings and areas, archaeology and historic landscapes. We have a duty to promote conservation public understanding and enjoyment of the historic environment. We are an executive Non-Departmental public body and we answer to Parliament through the Secretary of State for Digital Culture Media And Sport.</p> <p>We can confirm Historic England's have been party to extensive pre application discussions with regards to this proposal.</p>	This response has been noted.
RR-014-2	<p>The Proposal</p> <p>The development would be for a new 2.6km section of dual carriage way on the A47 from Wansford in the west to Sutton in the east, including additional infrastructure and connecting roads.</p>	No response required.
RR-014-3	<p>Representation</p> <p>We summarise our representation regarding this proposal proposed project as follows. Please note we do not intend to attend the preliminary hearing; we will however be submitting full written representation at the appropriate date.</p>	No response required.

Reference	Relevant Representation	Applicant's Response
RR-014-4	<p>Introduction</p> <p>The applicant has provided a full Environmental Statement, which includes historic environment chapters our written representation will comment more fully on the ES, however for the purposes of representation are key considerations are summarised below.</p>	This response has been noted.
RR-014-5	<p>Historic Environment</p> <p>We are aware the proposed development lies in a highly sensitive area for the historic environment, adjacent to one scheduled monument and within the setting of a range of highly valued heritage receptors.</p> <p>It was agreed during the pre-application process that detailed assessment of the historic environment would be required for the application under number of the specific measures were recommended and undertaken. This included a Desk Based Assessment, an assessment of the impact of the proposal on the settings of heritage assets, as well as geographical survey and trial trenched evaluation.</p> <p>The information provided is of a high standard and we broadly accept the conclusions and, further detailed comments will also be provided in our written representations.</p>	This response has been noted.
RR-014-6	<p>Impacts on designated and non-designated heritage assets</p> <p>Our primary consideration in relation to this scheme is however the impact of the proposal on the designated</p>	Mitigation through excavation and recording has been agreed with Historic England. Mitigation through avoidance has been achieved as far as is practicable through design of the horizontal alignment and embankments in this location. These

Reference	Relevant Representation	Applicant's Response
	<p>heritage asset (scheduled monument) Known as the <i>'Cropmark site of a barrow cemetery and a quadrilateral ditched enclosure, together with pits and a pit alignment, approximately 837m south east of Sacrewell Farmhouse'</i> (LEN 1006796). This asset borders the DCO boundary on the north side of the A47.</p> <p>Historic England are keen to ensure the avoidance of significant impacts to this monument however, we can confirm we are aware of the late scheme changes that would include a small area of the scheduled monument within the DCO boundary. We confirm we have been consulted on the changes and acknowledge this would result in harm to the significance of the asset, the asset but at level we consider is likely to be broadly acceptable.</p> <p>Further advice will therefore be offered through our Written Representation in relation to the scheduled monument as well as commentary on other highly graded undesignated heritage assets affected by the scheme.</p>	<p>design considerations were discussed and agreed with Historic England, who will be consulted throughout the development of detailed design, drafting of the Written Scheme of Investigation (WSI) and during works.</p> <p>Consideration of preservation in situ will be a key aspect of the archaeological works set out in the WSI. This will include consideration of burial of the affected part of the scheduled monument as detailed in the Record of Environmental Actions and Commitments (REAC) within the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1), Commitments CH5 and CH6.</p>
RR-014-7	<p>We are also aware the development will result in a range of potentially significant impacts on a number of other non-designated heritage assets and archaeological sites. We have for example been in discussion with the applicant in relation to the former station at Sutton, which is earmarked for demolition. This is not a designated asset; however it has a high degree of significance relating to its form and function. Its demolition would therefore result in a very high degree of harm and total loss of heritage significance.</p>	<p>Please refer to Common Response G.</p>

Reference	Relevant Representation	Applicant's Response
RR-014-7	We have however been in discussion with the applicant about proposals to relocate the station buildings. Relocation has potential to reduce the loss of significance and this matter will be further explored in our representation.	<p>Please refer to Common Response G.</p> <p>Whilst the Applicant is willing to continue discussing the potential relocation of the Station Buildings, these works would be dependent on the Scheme programme being unaffected.</p> <p>If relocation is not progressed by a third-party, the materials will be offered as salvage to appropriate parties who may wish to use the materials for repair/maintenance of other similar historic properties as described in the Record of Environmental Actions and Commitments (REAC) Commitment CH3 within the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1).</p> <p>If no party is found for relocation or salvage, the materials will be disposed of according to Environmental Statement (ES) Chapter 10 Materials Assets and Waste section 10.9.12 (APP-048) and ES Appendix 10.2 Outline site waste management plan (APP-121).</p>
RR-014-8	In the event of the project being consented we would also want to ensure that there is no further impact on the scheduled monument and we will be providing comments on the CMP, the Outline Written Scheme of Investigation on the DCO wording.	This response has been noted.

19 RR-015 IAN AUNGER

Reference	Relevant Representation	Applicant's Response
RR-015-1	My interest is in the safe cycling access to Wansford part of the scheme. I believe that there will be an underpass from the lorry parking area, going underneath the A1 and emerging on the Wansford side. At one end there is a 20% gradient, which is difficult to cycle up and not suitable for bikes pulling children in trailers. Also the area will not have any surveillance and is quite remote. I would not feel safe using such a facility. Especially with rising incidence of bicycle theft. That plus the 20% gradient would mean that I would not use the facility and would elect to cycle along the dual carriageway. How about a cycle bridge with ramps?	Please refer to Common Response A.

20 RR-016 IAN HANBY

Reference	Relevant Representation	Applicant's Response
RR-016-1	I believe there is no provision of a safe and accessible cycle route in this scheme. The suggested use of a totally inadequate use of an underpass will not meet the requirements of the National Highways scheme and will not meet the standards required by Peterborough City Council.	Please refer to Common Response A.

21 RR- 017 JACKSON HURST

Reference	Relevant Representation	Applicant's Response
RR-017-1	support for the A47 Wansford to Sutton scheme	This response has been noted.

22 RR-018 JANE HUNT

Reference	Relevant Representation	Applicant's Response
RR-018-1	That the proposed provision for accessible cycleways is inadequate and does not provide for the community of Wansford to safely connect with the sustainable transport route (access under A1). That there is inadequate safe access across the top of the A1 for cycles. That the impact on traffic on the Old North Road and joining the proposed new A47 junction layout is unacceptable and will cause delay and danger. That the junction of Old Leicester Road and the A47 will need modification akin to that in the original proposed scheme.	Please refer to Common Response A.

23 RR-019 JANE REID

Reference	Relevant Representation	Applicant's Response
RR-019-1	Highways England's proposed plans for the dualling of the A47 between Wansford and Sutton has much to support and is a definite improvement on their original scheme as presented to the villagers of Wansford, Sutton and Upton.	This response has been noted.
RR-019-2	As a resident of Sutton and a joint landowner directly affected by this project I had many concerns over the proposal and it is good to see the mitigation measures that are planned to safeguard our land, the environment and wildlife and the village of Sutton.	This response has been noted.
RR-019-3	The provision of the new NUM route is a real asset with its link to the northern side of the road under the old railway bridge but it must be suitable for horse and rider to pass safely underneath.	The Applicant will investigate use of the proposed underpass by equestrians and will report the findings of these investigations to the Examination at Deadline 2.
RR-019-4	As land slippage is a problem for the road alongside the River Nene floodplain it would have been good to see the road along this section move a little further North. Unfortunately this has been prevented by the proximity of the Historic England's Scheduled Monument even though there appears to be very little of historic value at the southern end of this field.	Please refer to Common Response B and H.
RR-019-5	The plans for the roundabouts at Wansford do however concern me. The improvements to the A1/A47 junction at the eastern roundabout will greatly improve the traffic flow. However the increase in traffic that the new road will bring is going to put more pressure on the western roundabout, making it even more difficult for villagers to get out of	Please refer to Common Response D.

A47 Wansford to Sutton Dualling

Applicant's Response to Relevant Representations

Reference	Relevant Representation	Applicant's Response
	Wansford, especially at peak times. At present the traffic lights on the eastern roundabout allow for welcome gaps in the traffic during the morning rush.	

24 RR-020 JENNA BAKER

Reference	Relevant Representation	Applicant's Response
RR-020-1	<p>Intro</p> <p>My views are these : Objection to A47 dualling Sutton to Wansford Scheme. We object to this application on three grounds:</p> <ol style="list-style-type: none"> 1. Lack of consultation with Upton village and surrounding rural area. The 3 options in the statutory consultation did not involve severing Upton Main Road. 2. The plans are unsafe for Upton Drift and Langley Bush Road 3. The plans sever historical links for pedestrians, cyclists and horse-riders with Sutton, Castor & Ailsworth <p>Detailed explanation:</p>	<p>Responses are provided to the individual concerns below in RR-020-2, RR-020-3, RR-020-4.</p> <p>Please note, this is the same response as RR-008 and RR-009 as the same representation has been submitted by each party.</p>
RR-020-2	<p>Lack of consultation with Upton village and surrounding rural area.</p> <p>The 3 options in the statutory consultation did not involve severing Upton Main Road. In 2017 Highways England issued a preferred route document [] It listed three options and a preferred route. Non of the routes identified involved the moving of the Sutton roundabout or the severing of Uptons access road. For this reason Upton village and farms did not actively participate in the statuary consultation process. In fact the brochure [] for this consultation had a comprehensive design that did not materially impact Upton. Then in July 2020 the village heard a rumour of the Upton road being severed. We contacted Highways England who told a village meeting of this plan (when would we have been told if we hadn't asked?). The meeting was only open</p>	<p>Please refer to Common Response E.</p>

Reference	Relevant Representation	Applicant's Response
	<p>to residents (one per household) of the village and did not include the tenant farmers or Milton Estate, the main land owner. In the meeting a google map was projected on a screen and Highways England, [] and [] pointed at the proposed new route. We had no plan, no papers. We were then asked to vote on the following: The proposal to close Upton road and have one access along Langley Bush Road (LBR) and The Drift. To divert all traffic from Sutton Heath Road (SHR) and LBR through Upton and to the current roundabout location on the A47. With no written plans, no time to consider the implications we were pressed in to a vote.</p> <p>The village voted for option 1. On reflection the village realised that this was a sham vote for the following reasons: Not all landowners, tenants and resident's were allowed to attend the meeting or had notice of the meeting. No notice of the plans in advance and time to consider the implications. Voting for option 1 was on the assurance from Highways England that LBR and The Drift would be improved to two way roads (this is now being denied) The options presented were not the only options available and in fact we believe option 2 above was never on the table.</p>	
RR-020-3	<p>The plans are unsafe for Upton Drift and Langley Bush Road</p> <p>Currently the majority of traffic to and from the village and farms is along Upton Road. The local traffic avoids The Drift and LBR because it is narrow and has blind bends caused by hedgerows and over-grown verges. The road is used by cyclists, pedestrians and horse riders as well as cars, lorries</p>	<p>Please refer to Common Response F.</p> <p>Figure 6 1 in Section 6.2 of the Transport Assessment (AS-024) shows the extent of the Wansford Transport Model (WTM) study area used for the assessment of the Scheme. The WTM covers the strategic traffic movements across the A47 corridor between Wansford and Peterborough. To the</p>

Reference	Relevant Representation	Applicant's Response
	and agricultural vehicles. Forcing all traffic to use The Drift and LBR will lead to congestion at peak times and there is no safe separation for pedestrians, cyclists and horse-riders. Langley Bush Road is very dangerous for these users. (Currently separation on Upton Road is achieved through wide verges) No account has been taken in traffic modelling for the extra traffic from North of Peterborough that will use this route to the A47 after the project. Human nature is that people will be attracted to this route as the dangerous SHR junction has gone. We believe traffic volume will be substantially higher than estimated. Many residents in Upton have had accidents over the years along these roads. The roads are too narrow for modern agricultural vehicles and lorries to pass.	<p>north the buffer area of the model extends to the towns of Sleaford and Grantham. The model is therefore capable of assessing the wider area traffic patterns along Langley Bush Road.</p> <p>Section 7.12.7 of the Transport Assessment (AS-024) describes the road safety benefits of the Scheme. The COBA-LT analysis demonstrates that the Scheme improves road safety overall by reducing the numbers of accidents and consequently the number of casualties. The Scheme improves safety along the A47 by providing upgraded dual carriageway alignment and a separate A1 eastbound off-slip. In total, over a 60-year timeframe, the Scheme's improvements will save a total of 265 casualties and 42 KSIs (killed or seriously injured) (Table 7-16).</p>
RR-020-4	<p>The plans sever historical links for pedestrians, cyclists and horse-riders with Sutton, Castor & Ailsworth</p> <p>The five parishes (Upton, Sutton, Castor, Ailsworth, Marholm) have had historical links as communities together with Milton since the 16th century. This project nearly doubles the distance for cycling/walking from Upton to Sutton, an additional 1.62km (from 1.92km to 3.54km). LBR is Dangerous for pedestrians, horses and cyclists as there is no separation, no escape route if two large lorries or agricultural vehicles pass. Moreover there are no plans currently for a bridge or underpass and so pedestrians and cyclists will have to negotiate across a busy dual</p>	<p>Movement is still enabled for pedestrians, cyclists and horses and the historic context is not obscured, as it is preserved in the historical record.</p> <p>Please refer to Common Responses C and F. These issues are discussed further in RR-011-2.</p>

A47 Wansford to Sutton Dualling

Applicant's Response to Relevant Representations

Reference	Relevant Representation	Applicant's Response
	carriageway / roundabout. The reality is that this won't be safe or palatable to many people and so the community links will be severed.	

25 RR-021 JOHN HODDER

Reference	Relevant Representation	Applicant's Response
RR-021-1	I object to the proposal to close the current main road access to Upton. This closure was not part of the statutory consultation and there has been inadequate consideration of access to and from Upton, which has long standing, historical and ongoing links with the neighbouring villages of Ailsworth, Castor and Sutton. The need is for road users of all kinds: motor vehicles, cyclists, horse riders and pedestrians.	Please refer to Common Response E and C.
RR-021-2	The plans for the Drift and Langley Bush Road are inadequate.	Please refer to Common Response F.

26 RR- 022 JOHN STANNAGE

Reference	Relevant Representation	Applicant's Response
RR-022-1	I am a long-standing resident of Wansford and use the A47 considerably to travel to Peterborough and Leicester. I agree the A47 urgently needs to be upgraded and in the main the scheme succeeds in its objectives bar two very important failings.	This response has been noted.
RR-022-2	The Scheme has failed to include the Wansford western roundabout, which will negate any benefits to journey times and safety when travelling westwards, especially joining A1 North. It will also likely cause chaos at time to traffic attempting to access the A47 from Old North Rd.	Please refer to Common Response D.
RR-022-3	The proposed route to the south of the Scheduled Monument field has major geotechnical failings with the unstable slope towards the River Nene and will cause untold damage to the Countyside Wildlife corridor within the Nene Valley.	Please refer to Common Response B.

A47 Wansford to Sutton Dualling

Applicant's Response to Relevant Representations

27 RR-023 KARL GRUNDY

Reference	Relevant Representation	Applicant's Response
RR-023-1	Safe access from either side of the A1 between wandsford to Stamford for cyclist with out the need to use the A47	Please refer to Common Response A.

28 RR-024 LORRAINE TURNELL

Reference	Relevant Representation	Applicant's Response
RR-024-1	I object to this application because :- Lack of consultation with residents of Upton Village and surrounding rural area. The three options in statutory consultation did not mention anything about Upton Main Road being closed.	Please see Common Response E.
RR-024-2	The plans are unsafe for Upton drift and Langley Bush Road.	Please see Common Response F.
RR-024-3	Closing Upton Main road severs safe and easy access to Castor, Ailsworth and Sutton for pedestrians, cyclists and horse-riders.	<p>Please refer to Common Response C.</p> <p>With regard to accessibility for cyclists to/from Ailsworth/Castor. The section of Peterborough Road between Ailsworth and the existing Sutton Road roundabout is identified on the Official Peterborough City Cycle Map as an advisory on-road cycle route. This implies that this route is lightly trafficked and the City Council consider that it is a safe route for cyclists. Indeed, the WCH surveys recorded a high number of cyclist movements on Peterborough Road, the majority of which passed through the Sutton Road roundabout travelling north to south (and vice versa) across the A47. The Scheme would have little impact on traffic conditions on the section of Peterborough Road providing access to/from Ailsworth so the status quo for cyclists is maintained. In view of this, there is no requirement to extend the proposed shared use cycle track further to the east towards Ailsworth.</p>
RR-024-4	I feel residents of Upton are being pushed aside without our thoughts and concerns being considered	Please refer to Common Response E.
RR-024-5	Upton drift, even with passing places is too narrow for the	Please refer to Common Response F.

Reference	Relevant Representation	Applicant's Response
	type of vehicles and amount of traffic. Langley Bush Road will have an increase of traffic joining the new dual carriageway making this without improvements completely unsafe for cyclists, pedestrians and horse-riders.	
RR-024-6	The amount of money this is costing is extortionate and a waste for such a short stretch of road.	<p>All National Highways' road schemes have a Value for Money appraisal assessment carried out based on the benefits that a scheme will provide once completed.</p> <p>The main benefits of the A47 Wansford to Sutton Scheme are improved journey times, improved journey time reliability and improved safety. The benefits provided by the Scheme see the it rated as high value for money (see Case for the Scheme (AS-022) Section 5 Economic Case Overview).</p>
RR-024-7	The upset and devastation to wildlife unforgivable.	As detailed in Table 8-11, 8-12 and 8-14 of Environmental Statement (ES) Chapter 8 Biodiversity (AS-015), where there is a potential for a predicted impact on ecological receptors appropriate mitigation has been presented in line with Design Manual for Roads and Bridges (DMRB) standard LA108 Biodiversity.

A47 Wansford to Sutton Dualling

Applicant's Response to Relevant Representations

29 RR-025 LYN BELL

Reference	Relevant Representation	Applicant's Response
RR-025-1	Our access to Castor and Ailsworth School, only convenient small shop, Church, friendship club, cafe all compromised by the closure of a road that has stood the test of time since my Father was a boy in Upton	Please refer to Common Response C.

30 RR-026 MALCOLM JACKLIN

Reference	Relevant Representation	Applicant's Response
RR-026-1	The need for a provision for cyclists either for commuting or recreational purposes seems to have been largely ignored. The proposed route doesn't offer practical options with a steep incline into Wansford that will not be rideable for many riders going up the incline, and those going down will probably also find it uncomfortably steep, and this will be compounded with a sharp ninety degree turn at the lower end of this where people could be approaching from the other direction. A road improvement scheme on this scale seems to have made little provision for making more suitable cycling, walking and horse riding options.	Please refer to Common Response A.

31 RR-027 MARTIN LEWIS

Reference	Relevant Representation	Applicant's Response
RR-027-1	WCHR The scheme does not provide adequate means to cross the A1 by bicycle. The existing crossing, running under the road and then up a steep slope, is not really fit for purpose, and would not be considered safe by most users on cycle or on foot. The scheme should provide a safe crossing over the road level, and not act as a major barrier between east and west of the A1 to anyone not in a car	Please refer to Common Response A.

32 RR-028 MARTYN HANDLEY

Reference	Relevant Representation	Applicant's Response
RR-028-1	I am very concerned that The western roundabout at the junction of the A47 /A1 is being ignored in the scheme. It is already a difficult junction and dangerous to exit from the main village Old North Road , in the rush hour and Highways England own calculations predict a significant increase in traffic over the years. Currently the traffic Lights on the Eastern Roundabout allow a respite and allow Wansford traffic to leave the village. The removal of the Eastern roundabout Traffic lights without any corresponding improvement in the Western roundabout is going to cause havoc. Improvements to the Western Roundabout are essential	Please refer to the Common Response D.

33 RR-029 MICHAEL GRANGE

Reference	Relevant Representation	Applicant's Response
RR-029-1	<p>I have been a resident of Sutton for almost 30 years and have regularly seen traffic disruption due to accidents along this dangerous stretch of the A47. I strongly support the dualling proposals from Sutton roundabout to Wansford east roundabout to prevent further deaths and serious injury to road users. As an active member of the community I have been engaged on this project since 2017. The early engagement with Highways England (HE) project team was less than fruitful as they constantly ignored the concerns of local residents. They lacked honesty with their answers to questions and were regularly corrected on their factual errors to justify their choice of preferred route alignment. The pre consultation was a sham and the engagement with Historic England was pitiful, only the tenacity of the Parish Councils and one land owner persuaded Historic England to shift from their intransigent position allowing the far better alignment within the current proposals. The Statutory Consultation documentation was totally biased towards HE's preferred route with significant errors and omissions. A local action group ensured the public got a balanced view which reflected in the overwhelming rejection of HE's initial proposals. Following the outcome of the Statutory Consultation a new HE project team was installed with a promise that they would listen. To date, the new project team have been far more engaged and responsive. Following a full review of HE's preferred alignment was this finally rejected and that which the community firmly favoured has been adopted. However, the wasted time, effort and public funds needed to get this position is an</p>	<p>A non-statutory consultation was held in 2017 where three scheme options were presented, in order to assist with selection of a preferred route. Feedback from this options consultation and further assessments influenced selection of a preferred route (an amended version of option 2). In 2018 statutory consultation was undertaken to consider the preferred route. See the Consultation Report (AS-011) and Annex A of the Consultation Report (APP-024) for the Preferred Route Announcement (PRA).</p> <p>The consultations were designed to be fair and non-biased.</p> <p>Please refer to Common Response H.</p>

Reference	Relevant Representation	Applicant's Response
	extremely poor reflection on Highways England and Historic England alike.	
RR-029-2	<p>Whilst I support and fully accept HE have made major improvements within the scheme proposals submitted to the Inspector they are not without issues that seriously concern me like it does the wider community and local residents: The traffic flow advantages gained by the dualling will be seriously compromised by the failure to include upgrades to the western roundabout at Wansford. Safety issues will be exacerbated whilst exiting Wansford onto the western roundabout. Safety concerns from Upton residents needs careful consideration and fully addressing. If the current proposals are to proceed then careful monitoring of the safety issues with necessary improvements where appropriate will need enforcing. Solving the issues at this stage will be far more cost effective for the public purse.</p>	Please refer to Common Response D.
RR-029-3	<p>Ignoring the overall safety and connectivity concerns of the WCHR community must be resolved. There is solid evidence of the shortcomings and relatively simple solutions on which the Planning Inspector needs to be full briefed. I hope the Planning Inspectorate uses its powers to ensure the above issues are satisfactorily resolved minimising any delays in the commencement of this project.</p>	Please refer to Common Response A.

34 RR-030 MILTON (PETERBOROUGH) ESTATES COMPANY

Reference	Relevant Representation	Applicant's Response
RR-030-1	We wish to submit our considerations on your proposed Development Consent Order (DCO) On behalf of Milton (Peterborough) Estates Company and Sir Philip Naylor Leyland BT.	
RR-030-2	As the application stands, we are minded that we would appeal the DCO decision pursuant to section 118 of the 2008 act, due to incorrect interpretation of policy and procedural fairness. We believe the process is flawed as the public consultation in 2017/2018 was on a scheme that started west of the Nene roundabout, whereas the DCO application is based on a completely different scheme which now starts east of that roundabout. Furthermore, the red line boundary during that consultation and the consequent results and preferred route announcement all incorporated the existing Upton Roundabout, therefore during and after the statutory process we were not given the opportunity to agree a statement of common ground. We are told the 2020 revision is based on the 766 responses from the 2017 consultation but no one had the opportunity to see the revised route to be able to objectively respond. The proposed scheme, as presented in 2017 clearly detailed that the scheme started west of the Nene roundabout (Upton - Castor & Ailsworth). This 2017 proposal showed the retention of this roundabout along with a safe local access to Upton. Accordingly, the businesses and residents of Upton made no significant representations on this proposal as there was no need to make an objection. The 2020 proposal has removed this	<p>Please refer to Common Response E and F.</p> <p>The Applicant will seek to agree a Statement of Common Ground with Milton (Peterborough) Estates Company.</p>

Reference	Relevant Representation	Applicant's Response
	<p>access, and safe, suitable appropriate connection to A47 and the scheme starts east of this roundabout. It is our assertion that there has been no relevant consultation on the east of the scheme, and we strongly request you reconsider the loss of an access to the village of Upton as Highways England have not consulted appropriately on this new outline scheme design. From 12th November 2018 when the extended consultation period ended to the 19th October 2020 when the Project update was issued with a new route no attempt was made to consult key stakeholders or local residents. If Highways England had given additional time to consult and this had resulted in an amendment to the current SGAR 3 Prelim. Design, to retain this roundabout and retain the connection to the west of this roundabout to the existing LAR (Local Access Road), then this would;</p> <ul style="list-style-type: none"> • Satisfy the primary concerns of the businesses and residents of Upton, with regards safe access and connectivity. • Ease congestion, and Operational Safety issues on your current new, eastern roundabout. • Provide scheme budget savings through; <ul style="list-style-type: none"> • design development savings • Scheme programme delays caused by Judicial Review • Construction cost savings ? Reducing the scheme length ? Avoiding the need to demolish and remove the existing, functional roundabout, which provides safe and appropriate local connectivity. 	

Reference	Relevant Representation	Applicant's Response
RR-030-3	<p>Upton village is very much an Estate village with operating agricultural units and many residential tenants also. Policy -during the past year we have tried to establish the justification of the design of the new proposed roundabout versus the retention of the existing Nene Roundabout. We have been told this is an off line construction and down to cost and design standards, however the dualling of the A47 is on the line of the current Nene Roundabout which was built in 1990. Whilst consideration must be given to the Design Manual for Roads & Bridges (DMRB) and consideration that some standards have been updated since, we would still need to be convinced this dramatic alteration is justified. It makes no sense to remove a roundabout that exists and replace with a new roundabout that removes a perfectly acceptable access. This is also a cost saving which should be considered in the context of the expense to date. We would like to see a reasoned and justified response to moving the present Nene roundabout to its new location including reference to the design manual and costs. Similarly reasons why a eastbound slip road has not been considered connecting to the Upton Road.</p>	<p>For safety reasons current design standards do not permit direct accesses for side roads to join dual carriageways. As such, whilst consideration must be given to the existing Upton Road connection with the A47, consideration must also be given to the users of the existing Sutton Heath Road junction with the A47. Sutton Heath Road links to other local communities in the area.</p> <p>Based on 2015 modelled 2-way Annual Average Daily traffic Flows (AADT), rounded to the nearest one hundred, Sutton Heath Road experiences 2,200 vehicle movements compared with 400 on Upton Road.</p> <p>The proposed location of the new roundabout location therefore ensures that users of the Sutton Heath Road can safely join the new carriageway without being diverted east to the existing roundabout location.</p> <p>Whilst the new roundabout location requires closure of the existing Upton Road access, an alternative route is available for all Upton Residents; along Upton Main Road, Langley Bush Road, and the new Sutton Heath Road. The approximate difference in journey lengths and times is shown in the attached drawing in Annex A. Following feedback from the Upton residents, improvements are proposed to the Upton Main Road as part of this Scheme. These consist of new passing places, local widening, straightening the existing S-bend, and widening of the existing junction with Langley Bush Road and the existing injunction adjacent to Model Farm.</p>

Reference	Relevant Representation	Applicant's Response
		In addition, the proposed location of the new roundabout will enable offline construction which will significantly reduce disruption during construction.
RR-030-4	As the current scheme stands, we believe the access road known as the Drift and the junctions onto Langley Bush Road and Sutton Heath Road are unsafe with the increased usage following the closure of Upton Road and again do they comply with the DMRB. Consideration would be given to the Drift road being made into a dual road as Milton own the land on either side.	Please see Common Response F. With regards to Design Manual for Roads and Bridges (DMRB) standards, the DMRB provides requirements for motorways and all-purpose trunk roads. Much of the existing local road networks do not comply with the DMRB.
RR-030-5	Highways England have offered increased passing places and some straightening but these attract unwanted fly tipping and leisure parking/activities.	The Applicant is considering mitigation regarding the concerns mentioned and discussions with Peterborough City Council will continue.
RR-030-6	On behalf of the Milton (Peterborough) Estates Company & Sir Philip Naylor Leyland BT, we are in support of the dualling of the A47 but will be minded to appeal against this application as it stands.	This response is noted.

35 PRR-031 NATIONAL GRID PLC

Reference	Relevant Representation	Applicant's Response
RR-031-1	<p>Representation by National Grid Electricity Transmission Plc & National Grid Gas Plc in relation to the A47 Wansford to Sutton Project ("the Project") National Grid Electricity Transmission Plc ("NGET") & National Grid Gas Plc ("NGG") wishes to make a relevant representation to the Project in order to protect its position in relation to infrastructure which is within and in close proximity to the proposed Order limits. NGET's & NGG's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the Order limits must be maintained at all times and access to inspect and maintain such apparatus must not be restricted. The documentation and plans submitted for the Project have been reviewed in relation to impacts on NGET's & NGG's existing apparatus and land interests located within this area.</p> <p>The following assets are within, or in close proximity to, the Order limits:</p> <p>Overhead Lines</p> <ul style="list-style-type: none"> • 4VK (400kV) overhead line route – COTTAM – EATON SOCON – WYMONDLEY Towers • 4VK256 & 4VK260 Gas Pipeline • Feeder 9 High Pressure Gas main <p>NGET & NGG require protective provisions to be included within the DCO to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. NGET & NGG are liaising with the Promoter in relation to the protective provisions for inclusion within the</p>	<p>NGET (Electrical) and NGG (Gas) assets are present within the Scheme boundary. Neither are proposed to be diverted, but construction works will occur in close proximity and will impose constraints / require controls on working methodology. Protective Provisions and Side Agreement discussions are progressing between the parties' respective legal teams and it is anticipated that agreement will be reached before the end of the examination.</p>

Reference	Relevant Representation	Applicant's Response
	DCO, along with any supplementary agreements which may be required. National Grid will keep the Examining Authority updated in relation to these discussions. National Grid's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. NGET & NGG reserves the right to make further representations as part of the examination process but in the meantime will negotiate with the Promoter with a view to reaching a satisfactory agreement.	

36 RR-032 NATURAL ENGLAND

Reference	Relevant Representation	Applicant's Response
RR-032-1	<p>Part I: Summary of Natural England's advice</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p>	This response has been noted.
RR-032-2	Natural England's advice in these relevant representations is based on information submitted by Highways England in support of its application for a Development Consent Order ('DCO') in relation to A47 Wansford to Sutton NSIP.	This response has been noted.
RR-032-3	Natural England has been working closely with Highways England and its associate consultants to provide advice and guidance since 7 March 2018.	This response has been noted.
RR-032-4	These relevant representations contain a summary of what Natural England considers the main nature conservation issues to be in relation to the DCO application, and indicate the principal submissions that it wishes to make at this point. Natural England will develop these points further as appropriate during the examination process. It may have further or additional points to make, particularly if further information about the project becomes available.	This response has been noted.
RR-032-5	Part I of these representations provides an overview of the issues and a summary of Natural England's advice. Section 2 identifies the natural features relevant to this application.	This response has been noted.

Reference	Relevant Representation	Applicant's Response
	Section 3 summarises Natural England's overall view of the application and the main issues which it considers need to be addressed by the Secretary of State. Part II of these representations sets out all the significant issues which remain outstanding, and which Natural England advises should be addressed by Highways England and the Examining Authority as part of the examination process in order to ensure that the project can properly be consented. These are primarily issues on which further information would be required in order to allow the Examining Authority properly to undertake its task or where further work is required to determine the effects of the project and to flesh out mitigation proposals and to consider compensation proposals to provide a sufficient degree of confidence as to their efficacy.	
RR-032-6	Natural England will continue discussions with Highways England to seek to resolve these concerns and agree outstanding matters in a statement of common ground. Failing satisfactory agreement, Natural England advises that the matters set out in sections 4 to 7 will require consideration by the Examining Authority as part of the examination process.	This response has been noted.
RR-032-7	The Examining Authority may wish to ensure that the matters set out in these relevant representations are addressed as part of the Examining Authority's first set of questions to ensure the provision of information early in the examination process.	No response required
RR-032-8	The natural features potentially affected by this	The Applicant can confirm that the European / international

Reference	Relevant Representation	Applicant's Response
	<p>application</p> <p>The European / international designated sites relevant to this application are:</p> <ul style="list-style-type: none"> Nene Washes Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar. 	<p>designated sites relevant to this application are correct and are considered in Chapter 8 Biodiversity of the Environmental Statement (ES) (AS-015).</p>
RR-032-9	<p>The nationally designated sites relevant to this application are:</p> <ul style="list-style-type: none"> Nene Washes Site of Special Scientific Interest (SSSI); Sutton Heath and Bog SSSI; Wansford Pasture SSSI; West Abbot's and Lound Woods SSSI; Old Sulehay Forest SSSI; Castor Hanglands SSSI and National Nature Reserve (NNR); Castor Flood Meadows SSSI; Southorpe Roughs SSSI; Southorpe Paddock SSSI; Bedford Purlieus SSSI and NNR 	<p>The Applicant can confirm that the nationally designated sites relevant to the application are correct and are considered in Table 8-4, Chapter 8 Biodiversity of the Environmental Statement (ES) (AS-015).</p>
RR-032-1-10	<p>The following European protected species may be affected by the proposed project:</p> <ul style="list-style-type: none"> Bats (various species); Great Crested Newts (GCN); Otter 	<p>The Applicant can confirm that the European protected species listed may be affected. Mitigation has been detailed in Table 8-11 of Chapter 8 Biodiversity of the Environmental Statement (ES) (AS-015).</p>
RR-032-11	<p>The following nationally protected species may be affected by the proposed project:</p>	<p>The Applicant confirms that the Nationally protected species listed may be affected. Mitigation has been detailed in Table</p>

Reference	Relevant Representation	Applicant's Response
	<ul style="list-style-type: none"> • Badger; • Water vole; • Wintering birds and breeding birds including barn owl; • Reptiles: common lizard 	8-11 of Chapter 8 Biodiversity of the Environmental Statement (ES) (AS-015) and set out in Commitments BD 1 – BD16 in the Record of Environmental Actions and Commitments (REAC) within the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1).
RR-032-12	There are areas of non-designated but valuable and sensitive habitat which could be affected, including Sutton Meadows North County Wildlife Site (CWS), Sutton Dismantled Railway CWS and River Nene CWS.	These habitats are considered in Chapter 8 Biodiversity of the Environmental Statement (ES) (AS-015) and assessed in Table 8-14 (Neutral significance of residual effect).
RR-032-13	UK Priority Habitats that will be affected by the proposal include broadleaved woodland, calcareous grassland, and hedgerows. Other habitats affected include arable land, neutral grassland, ponds and rivers.	UK Priority habitats affected are shown on Environmental Statement (ES) Chapter 8 Biodiversity Figure 8.2 (APP-072) and assessed in ES Chapter 8 Biodiversity (AS-015).
RR-032-14	The project will result in physical damage, and or permanent loss of, Best and Most Versatile (BMV) land (Agricultural Land Classification (ALC) grades 1-3a) through temporary and permanent land-take.	The design of the Scheme has sought to minimise agricultural land take, however there will be some permanent loss of BMV land. Areas of temporary land take will be restored to their former condition, the long-term residual effects on agricultural soils would be limited to the permanent loss of agricultural land.
RR-032-15	<p>The main issues raised by this application are:</p> <ul style="list-style-type: none"> • Natural England has reviewed the Environmental Statement (ES), Report to Inform Habitats Regulations Assessment (HRA) and accompanying documents and is broadly satisfied that impacts to statutorily designated sites, other than Sutton Heath and Bog SSSI, can be ruled out or proposed mitigation is sufficient to demonstrate no adverse effect. Natural England advises that further information is required, 	<ol style="list-style-type: none"> 1. Please refer to response to RR-032-19 below. 2. The Applicant confirms that draft bat, badger and water vole licenses have now been submitted to Natural England. 3. The Applicant acknowledges Natural England's guidance on protected species. 4. The potential impacts to UK Priority Habitats will be minimised where possible and the mitigation is outlined and explained in Table 8-11, 8-12 and 8-14 of Environmental Statement (ES) Chapter 8 Biodiversity

Reference	Relevant Representation	Applicant's Response
	<p>detailed in section 3.4. below, in order to conclude that significant impacts can be ruled out for Sutton Heath and Bog SSSI.</p> <ul style="list-style-type: none"> In terms of European and nationally protected species, Natural England understands that draft bat and badger licence applications are currently in the process of being reviewed, and we also understand that we are awaiting the submission of a draft water vole licence. Natural England's standing advice provides guidance on how protected species should be dealt with in the planning system. Specific advice is provided within the detailed species sheets. The advice provided is based on the information currently available to us and is subject to any material changes in circumstances, including adjustments to the proposals or further information on the protected species. Potential impacts to UK Priority Habitats will be minimised where possible through ecological mitigation and enhancement measures outlined in the EMP. We note that the proposed scheme comprises approximately 45ha of agricultural land, including 33.8ha classified as 'best and most versatile' (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system). We advise that the land quality of the temporary land-take should be preserved to minimise impacts on soils and 'best and most versatile' land. Natural England notes the use of Defra metric 2.0 	<p>(AS-015).</p> <p>5. Measures to minimise the impacts on soils are set out in Table 1.5 of the Record of Environmental Actions and Commitments (REAC) within the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1) Commitments GS1- GS5.</p> <p>6. A Soil Management Plan (SMP) will be developed as part of the Second Iteration of the EMP (TR010039/APP/7.5 Rev 1) in accordance with Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites to help preserve land quality on the temporary land take areas. The SMP will be developed by an appropriately experienced soil specialist.</p> <p>7. Overall biodiversity net gain ("BNG") is not considered to be an appropriate metric by which to examine the Scheme. In particular, Defra Metric 2.0 was replaced by 3.0 when the Environment Act came into force, but it remains subject to variation and is expected to be consulted upon in 2022. To satisfy the requirements of Defra Metric 3.0, additional surveys would be necessary. As Defra Metric 3.0 was published on 7 July 2021 and post-dates the ecological surveys carried out to inform the Biodiversity assessment, the scope of these surveys did not extend to capturing and recording the necessary condition information required as input data into the metric. Accordingly, it would not be possible for the Applicant to present a meaningful, accurate and comparable calculation in the absence of this survey information.</p> <p>8. Enhancements for the project are or will be put forward for consideration as part of National Highways</p>

Reference	Relevant Representation	Applicant's Response
	<p>for Biodiversity Net Gain. We advise that the further information is required on the methods used to assess net gain, as well as the project's overall target for net gain</p> <ul style="list-style-type: none"> Natural England advises that consideration should be given to incorporating biodiversity and green infrastructure enhancements to deliver benefits for people and wildlife, particularly to the land around Sutton Heath and Bog SSSI. 	<p>Designated Funds programme, although this is not part of the Scheme, and the Applicant acknowledges that it is not to be taken into account in determination of the application.</p>
RR-032-16	<p>Part II: Natural England's Relevant Representations in respect of A47 Wansford to Sutton</p> <p>Natural England's advice is that in relation to nature conservation matters within its remit there is no fundamental reason of principle why the project should not be permitted, but that there are a number of matters which have not been resolved satisfactorily as part of the preapplication process that must be addressed by Highways England and the Examining Authority as part of the examination and consenting process before development consent can be granted. Some of these matters are in Natural England's view so significant that it would be inappropriate to permit the project to proceed unless they were adequately addressed. However, Natural England's advice is that all these matters are capable of being overcome.</p>	<p>This response has been noted.</p>
RR-032-17	<p>Natural England's headline points are that on the basis of the information submitted:</p>	<p>This response has been noted.</p>

Reference	Relevant Representation	Applicant's Response
RR-032-18	<p>Designated Sites</p> <p>European / international designated sites:</p> <p>Natural England is satisfied that the project would not have an adverse effect on the integrity of the Nene Washes SPA, SAC and Ramsar. The applicant has submitted to Natural England, through our Discretionary Advice Service (DAS), a Report to Inform Habitats Regulations Assessment. Natural England can confirm that we are now in agreement with the conclusion of no likely significant effects, and therefore, there would be no significant effect on the integrity of the European site.</p>	<p>This response has been noted.</p> <p>.</p>
RR-032-19	<p>Nationally designated sites:</p> <p>Natural England is satisfied that significant impacts nationally designated sites, other than Sutton Heath and Bog SSSI, can be ruled out or proposed mitigation is sufficient to demonstrate no significant effect. Highways England has submitted a thorough ES which concludes that there have been no significant impacts identified to Sutton Heath and Bog SSSI. However, Natural England does not consider there is sufficient information available to rule out significant impacts to Sutton Heath and Bog SSSI with regards to air quality. This SSSI is situated within 200m of the proposed scheme, and the change in nitrogen deposition as a result of the project would exceed the 1% critical load threshold for Sutton Heath and Bog SSSI.</p> <p>Our advice is that the following should be provided:</p> <ul style="list-style-type: none"> We note that further modelling has been conducted, with the help of a competent expert, to rule out significant effects on the sensitive 	<p>Environmental Statement (ES) Chapter 5 Air Quality (APP-043) (paragraph 5.8.22) states that:</p> <p><i>The Sutton Heath and Bog Site of Special Scientific Interest (SSSI) supports grassland communities of two main types, namely calcareous grassland and neutral grassland of the base-poor marsh type, both of which are uncommon in Cambridgeshire. The southern extent of the site comprises semi natural broadleaved woodland. Air quality modelling highlighted an impact of nitrogen deposition 40m north of the proposed road alignment at Station House. The habitat within this 40m area is deciduous woodland comprising pedunculate oak (Quercus robur), and sycamore (Acer pseudoplatanus) abundant with hawthorn (Crataegus spp) and elder (Sambucus nigra) understory. None of the species listed are noted as particularly nitrogen vulnerable in this case. Nitrogen deposition would typically affect more coniferous species and species such as lichens/mosses/ferns rather than the species that are listed. As the core grassland habitat which is listed on</i></p>

Reference	Relevant Representation	Applicant's Response
	<p>qualifying features of the SSSI. However, we require further information on work that was done to determine the location and distribution of qualifying features that are sensitive to nitrogen deposition.</p> <ul style="list-style-type: none"> Measures for mitigation and monitoring of air quality impacts for Sutton Heath and Bog SSSI should be outlined. 	<p><i>the citation is approximately 150m further north-east of the 40m impact area, it is not considered to be impacted by nitrogen disposition from the proposed road alignment. No significant effects have therefore been identified.</i></p> <p>This text was provided based on the initial AQ modelling results – there was no further modelling conducted. It was determined there were no species sensitive to nitrogen deposition within the southern extent of the SSSI (area closest to the modelled road network and triggered links/Scheme design and modelled transect points). In accordance with Design Manual for Roads and Bridges (DMRB) LA105 Air Quality guidelines, as there were no species sensitive to nitrogen deposition in the southern extent of the SSSI within 200m of our triggered links there were no significant impacts recorded. Although not a triggered link, further ecological receptors in the form of transects were modelled along Sutton Heath Road to better determine the impact of the Scheme on the north-eastern section of the habitat. These modelled results showed all changes in concentration as a percentage of the lower critical load to be lower than the 1% - therefore in accordance with LA105 could be screened out of the assessment.</p> <p>Please see ES Figure 5.8 (APP-057).</p> <p>A 200m buffer from triggered links was used to identify ecological sites sensitive to nitrogen deposition were identified. A triggered link is a road link which meets the traffic screening criteria set out in the DMRB LA105 guidance – i.e it experiences an increase/decrease in AADT traffic flow by</p>

Reference	Relevant Representation	Applicant's Response
		1000 vehicles or 200 HGV with the Scheme in place.
RR-032-20	European and nationally protected species Natural England understands that draft bat and badger licence applications are currently in the process of being reviewed, and we also understand that we are awaiting the submission of a draft water vole licence. Natural England's standing advice provides guidance on how protected species should be dealt with in the planning system. Specific advice is provided within the detailed species sheets. The advice provided is based on the information currently available to us and is subject to any material changes in circumstances, including adjustments to the proposals or further information on the protected species.	The Applicant confirms that draft bat, badger and water vole licences have now been submitted to Natural England. The Applicant acknowledges Natural England's guidance on protected species.
RR-032-21	UK Priority Habitats: We are satisfied that potential impacts to UK Priority Habitats will be minimised through ecological mitigation and enhancement measures outlined in the EMP.	This response has been noted.
RR-032-22	Soil and Agricultural Land Quality: We note that the proposed scheme comprises approximately 45ha of agricultural land, including 33.8ha classified as 'best and most versatile' (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system). In order to safeguard soil resources of the temporary land-take as part of the overall sustainability of the development, it is important that the soil is able to retain as many of its many important functions and services (ecosystem services) as possible through careful soil management. Consequently, we advise that if the development proceeds, the developer uses an	A Soil Management Plan (SMP) will be developed as part of the Second Iteration of the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1) in accordance with Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites to help preserve land quality on the temporary land take areas. The SMP will be developed by an appropriately experienced soil specialist.

Reference	Relevant Representation	Applicant's Response
	appropriately experienced soil specialist to advise on and supervise soil handling, including identifying when soils are dry enough to be handled and how to make best use of the different soils on site. Further guidance is available in Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites and we recommend that this is followed.	
RR-032-23	Biodiversity Net Gain: We welcome the use of Defra metric 2.0 for Biodiversity Net Gain, but we advise that further information is provided on the methods used to assess net gain, as well as the project's overall target for net gain. As a public body with statutory duties to have regard to biodiversity under the NERC Act, we expect National Highways to have clear and measurable ambitions for the project to leave a positive legacy for nature proportionate to the scale and location of the scheme.	This response has been noted.
RR-032-24	Enhancement opportunities: Natural England advises that consideration should be given to incorporating biodiversity and green infrastructure enhancements to deliver benefits for people and wildlife. The land around Sutton Heath and Bog SSSI could be enhanced and used to create species-rich grassland, which would act as a buffer between the road and the SSSI. There is also potential for beneficial wetland habitat to be created and improved between the road and the River Nene.	This comment is noted.
RR-032-27	Part II: Outstanding matters requiring attention	Please refer to the response provided in RR-032-19 above.

Reference	Relevant Representation	Applicant's Response
	<p>Further evidence or assessment work required</p> <p>Further information requested in section 3.4 should be provided to rule out significant impacts on Sutton Heath and Bog SSSI with regard to air quality.</p>	
RR-032-28	Further information requested in section 3.8 should be provided on the methods used to assess net gain, as well as the project's overall target for net gain.	This comment is noted, please refer to RR-032-19.
RR-032-29	The ES and other relevant documents will need to be updated pending the outcome of ongoing habitat and species survey updates.	New information such as survey results will be provided separately if necessary to inform the Examination process. The ES assessment was correct at the time of submission and is therefore not required to be updated.
RR-032-30	<p>Comments on the draft DCO.</p> <p>Natural England is satisfied that the draft DCO includes appropriate requirements, including requirements to secure delivery of environmental mitigation and enhancement measures agreed in the relevant plans, including the Environmental Management Plan, as well as safeguarding European and nationally protected species.</p>	This response has been noted.

37 RR-033 NEIL STENGE

Reference	Relevant Representation	Applicant's Response
RR-033-1	That the design of the cycling infrastructure where it crosses (underneath) the A1 is not appropriate for the overall scheme, and fails to meet modern standards that might be considered essential for a scheme that will be used for both leisure and transport by cyclists. Furthermore, it is inaccessible to people with disabilities, not well considered or acceptable for vulnerable users, and may well be discriminatory in both these contexts.	Please refer to Common Response A.

38 RR-034 NORMAN GREEN

Reference	Relevant Representation	Applicant's Response
RR-034-1	<p>I am concerned that insufficient attention has been given to the safety aspects of the western roundabout, with particular regard to egress from the Old North Road / Thackers Close onto the A1/A47 slip road. The Assistant Project Manager has said: "As this element of the scheme was removed and is no longer within the scheme boundary it was not included when undertaking the Road Safety Audit as we are not altering or changing the road in this area. Although there are no plans to alter the existing condition of the exit from Thackers Close onto the A47 western roundabout as part of the A47 Wansford to Sutton dualling scheme, discussions have taken place with the Parish Council regarding the A47/A1 junction at Wansford, and we have committed to raising the concerns regarding the existing issues at the A47 / A1 junction to our Operations Department for consideration within future roads periods." It is a matter of significant concern that strong apprehensions expressed during consultations were dealt with by the removal of the relevant part of the scheme, meaning that the Safety Audit, which residents were assured would take a holistic approach, did not in practice cover this serious issue. It is firmly believed that the Road Safety audit needs to be extended to include egress from Thackers Close/the Old North Road onto the A1/A47 slip road, including the advisability of substituting traffic signals in lieu of the western roundabout.</p>	<p>Please refer to Common Response D.</p>

39 RR-035 OSBORNE CLARKE ON BEHALF OF WESTERN POWER DISTRIBUTION (EAST MIDLANDS) PLC

Reference	Relevant Representation	Applicant's Response
RR-035-1	<p>Osborne Clarke LLP on behalf of Western Power Distribution We act for Western Power Distribution (East Midlands) plc (WPD) whose registered office is at Avonbank, Feeder road, Bristol, BS2 0TB. WPD is the licenced distribution network operator under Section 6 Electricity Act 1989 (EA1989) for the area in which the Order is proposed to have effect. Section 9 of the EA1989 places a duty on the electricity distributor to develop and maintain an efficient, co-ordinated and economical system of electricity distribution.</p> <p>The application includes land in which WPD has assets and the land is subject to rights of compulsory acquisition. Whilst WPD has had positive engagement with the Applicant in relation to diversion works connected with the project, WPD needs to ensure that the wider powers being sought in the Order will not have a detrimental impact on WPD's electricity network and its duties under the EA1989, including ensuring that the terms of the proposed protective provisions are acceptable.</p> <p>WPD is therefore making this representation as a holding objection to the application until asset protection arrangements have been agreed between the parties. No formal agreement has yet been concluded and accordingly we are lodging this representation to protect WPD's position pending conclusion of an appropriate agreement.</p>	<p>Western Power Distribution's (WPD) assets are present throughout the Scheme and will be diverted and / or protected as required. Technical discussions are progressing well with regular dialogue. Protective Provisions and other discussions are ongoing.</p>

A47 Wansford to Sutton Dualling

Applicant's Response to Relevant Representations

Reference	Relevant Representation	Applicant's Response
	Once WPD are satisfied that its network is protected we will notify the Planning Inspectorate promptly and withdraw the objection.	

40 RR-036 PETERBOROUGH CITY COUNCIL

Reference	Relevant Representation	Applicant's Response
RR-036-1	<p>Highways</p> <p>Dualling the A47 will help to boost the economic prosperity of Peterborough and the regional economy as well as helping to deliver our planned growth. Peterborough's Local Plan, which was adopted in July 2019, sets out the overall vision, priorities and objectives for Peterborough for the period up to 2036. The strategy identifies the required delivery of 21,315 new homes and 17,600 new jobs between 2016 and 2036.</p> <p>The population of Peterborough has grown considerably over recent years and we are one the UK's top cities for population growth, making us one of the UK's fastest growing cities.</p> <p>We are also a member of the A47 Alliance, a collaboration of a variety of business leaders, politicians, local authorities from Peterborough, Norfolk, Cambridgeshire, Lincolnshire and Suffolk, who have come together to make the case for a fully dualled A47.</p>	<p>This response has been noted.</p>
RR-036-2	<p>We want the A47 Wansford to Sutton dualling and do not have any technical engineering objections to the plans. A critical issue with this scheme has been access to the village of Upton and we are pleased that HE have been undertaking meaningful dialogue with the village in recent months. It is important that the right mitigation is put in place to ensure that Upton are not negatively impacted upon by this scheme.</p>	<p>This response has been noted.</p> <p>Please refer to common responses E and F.</p>

Reference	Relevant Representation	Applicant's Response
RR-036-3	The majority of the technical issues have been addressed through the informal consultation process. However, there remains the need for some clarity relating to the severing of Sutton Heath Road and how the resulting dead end (for motorists) will be best used once the dualling has been completed. The approach seems unclear as different documents seem to reference either simply gating it off to provide pedestrian, cyclist and landowner use, or stopping up the land in question. The Local Highways Authority is content that a suitable solution can be reached however there will be a requirement for an agreement that will best suit the general public and not attract anti-social behaviour.	<p>Please see Common Response C.</p> <p>With the new gated access it is not considered that this 'dead end' would attract anti-social behaviour.</p>
RR-036-3	On the overall scheme we have an additional request from our Natural & Historic Environment in that where shelterbelt is proposed that margin of at least 5m of grass is achieved between such and the road edge.	<p>The detailed landscape design would be undertaken consistent with the requirements set out in the Design Manual for Roads and Bridges (DMRB) LD117. This includes paragraph 3.4.1 which identifies the distance back from the carriageway edge required by National Highways for different sizes of plants (shrubs, small trees and eventual large trees). LD117 requires that shrubs are located at least 4.5m back from the carriageway edge, small trees 7m and larger climax trees 9m. The requested distance of at least 5m for shelterbelt tree planting can therefore be accommodated.</p> <p>It would be in the interests of landscape mitigation if trees could be planted 5m back from local highway authority adopted roads (i.e. less than is typically required within the national trunk road network). This can be discussed with Peterborough City Council (PCC) during detailed design.</p>

Reference	Relevant Representation	Applicant's Response
RR-036-4	Rights of Way The creation of new routes between Wansford and Sutton and the new link under the A47 toward Sutton Heath Road using the old railway bridge is welcomed.	This response has been noted.
RR-036-5	Confirmation is required as to who will be responsible for the maintenance of these new routes and adjacent verges. Drawing no TR010039/APP/2.4 and HE551494-GTY-HKF-000-DR-CH-31006 shows areas of stopped up highway with a cycleway along it. Confirmation is required as to who would be responsible for the maintenance of the shared cycleway and adjacent verges.	<p>The Applicant will be responsible for the new Walking Cycling and Horse Riding (WCH) routes that form part of the Scheme and are within the Scheme boundary. Where new routes fall outside these areas, requirements for the maintenance of the new routes and adjacent verges, as shown in the Rights of Way and Access Plans (AS-008) will be agreed with Peterborough City Council and agreements will be outlined in a Statement of Common Ground (a draft of which will be submitted at Deadline 3).</p> <p>With regards to the Rights of Ways and Access Plans (AS-008) (referenced as document TR010039/APP/2.4, drawing No. HE551494-GTY-HKF-000-DR-CH-31006 in the representation), the Applicant will maintain the stopped up A47 highway and subsequent cycleway along it (C7/A5). Where the Sutton Drift is stopped up (A6/SU18/ SU19), it is expected that Peterborough City Council will continue to maintain this area along with the Sutton side road and cycleway (SU17).</p>
RR-036-6	The new link to Sacrewell under the new road access should be available 24 hours a day for pedestrians as this forms a part of the long distance path known as the Hereward way.	<p>The new link to Sacrewell will be a permissive route and should have the same rights as the existing route, which is currently available 24 hours a day for pedestrians. It will be closed at night for vehicles.</p> <p>The proposed Sacrewell Farm access road will be a private means of access. It will also become the route of the diverted</p>

Reference	Relevant Representation	Applicant's Response
		footpath Wansford Hereward Way Permissive 3.
RR-036-7	The new shared cycleway alongside the new road – confirmation is required as to who will be responsible for maintenance of the surface and the adjacent verges and what will the surface be made of.	<p>The Applicant will maintain the shared cycleway surface and verges within the Scheme boundary. Outside this area it is maintenance of the cycleway surface and verges will be agreed with Peterborough City Council and agreements will be outlined in a Statement of Common Ground (a draft of which will be submitted at Deadline 3).</p> <p>The shared cycleway falls outside the Applicant's boundary at the new service station entrance, the sideroad connection to Sutton and also the connection into Sutton Heath Road.</p> <p>The proposed cycle track running east to west and to the south of the new A47 would be constructed with a bound macadam surface. Future maintenance of the surface and the adjacent verges would be the responsibility of Peterborough City Council following a transfer of the asset.</p>
RR-036-8	It is requested that the existing bridges on the public right of way from Sutton to Wansford be replaced/upgraded to accommodate increased use of the routes.	<p>This is not within the scope of the Scheme.</p> <p>With the exception of the proposed changes/upgrades to permissive footpaths Wansford Nene Way Permissive 1, Wansford Nene Way Permissive 1 and Wansford Annual Maintenance 113 in the vicinity of the new access junction for Sacrewell Farm, as shown on Sheet 3 of the Rights of Way and Access Plans (AS-008), the Scheme does not impact on the other Public Rights of Way or permissive footpaths which provide a route between Wansford and Sutton. Maintenance responsibility for the existing bridges along the route will rest with either Peterborough City Council or the adjacent</p>

Reference	Relevant Representation	Applicant's Response
		landowner.
RR-036-9	Archaeology No objection in principle, subject to recommendations (below).	This response has been noted.
RR-036-10	Assessment/Comment: The following recommendations have been drawn up on the basis of information supplied in respect of the proposed scheme. The terms of these recommendations will be monitored as revisions and amendments may be required in consideration of further scheme/construction details and ongoing fieldwork results.	This response has been noted.
RR-036-11	The proposed road scheme will cross areas of known archaeological significance, with particular reference to the evidence for prehistoric, Roman and early medieval activity. The road will also skirt and partly bisect Scheduled Monument NHLE Ref: 1006796 – Cropmark site of a barrow cemetery and a quadrilateral ditched enclosure, together with pits and a pit alignment, approximately 837m south-east of Sacrewell Farmhouse. Mitigation has been subject to consultation. However, mitigation through design should be anticipated and proposed at the onset. Mitigation by avoidance or preservation by burial should also be considered.	Please refer to Common Response H.
RR-036-12	Programmes of investigation will be undertaken to mitigate the likely significant effects of the proposal on heritage assets where impact cannot be avoided. To this aim, the following programme of investigations will be implemented	The Heritage Mitigation Strategy will form Annex B.8 to the Second Iteration of the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1). The Record of Environmental Actions and Commitments (REAC) within the

Reference	Relevant Representation	Applicant's Response
	for the whole of the road corridor, i.e. the footprint of the scheme and any land outside that footprint (e.g., for compounds, water reservoirs, access routes, etc.), which includes any heritage assets physically affected.	<p>Environmental Management Plan (EMP) includes Commitments CH1 – CH10 for cultural heritage.</p> <p>The EMP is secured by Requirement 4 to the Draft Development Consent Order (DCO) (AS-010).</p> <p>Requirement 9 to the Draft DCO 'Archaeological remains' sets out:</p> <p><i>(1) No part of the authorised development is to commence until for that part a written scheme of investigation of areas of archaeological interest, reflecting the relevant mitigation measures set out in the REAC, has been submitted to and approved in writing by the Secretary of State, following consultation by the undertaker with the relevant planning authority.</i></p> <p><i>(2) The authorised development must be carried out in accordance with the approved scheme referred to in subparagraph (1).</i></p>
RR-036-13	<p>Consideration will also be given to the settings of any designated or other heritage assets in the footprint of the scheme or within the zone of visual influence. The assessment will include any new land-take associated with the project.</p> <ul style="list-style-type: none"> Targeted open area excavations within and outside the footprints of the scheme according to the significance of the heritage assets and the potential impacts of the scheme. Historic building recording of the locally listed station buildings to Historic England's standards 	<p>These works are set out in Environmental Statement (ES) Chapter 6 Cultural Heritage (APP-044) and Commitments CH1 – CH10 within the Record of Environmental Actions and Commitments (REAC) within the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1). Peterborough City Council will be consulted throughout the process of designing and delivering works the Written Scheme of Investigation (WSI) (see Requirement 9 to the Draft Development Consent Order (DCO) (AS-010).</p> <p>The royal observer corps bunker will be screened by appropriate fencing to prevent accidental damage. This is</p>

Reference	Relevant Representation	Applicant's Response
	<ul style="list-style-type: none"> • Historic building recording of the royal observer core site bunker to Historic England's standards (Level 3 minimum), should this be affected. • Measured survey of the portion of the railway embankment to be affected by the proposal. • Archaeological monitoring to complement the programme of excavation in suitable circumstances. • Archaeological monitoring of ground investigations/geotechnical surveys. Locations of the boreholes may be reviewed, should these affect potential archaeological remains, whether designated or non-designated. • Protection of / intervention affecting the Scheduled Monument (and other non-designated heritage assets which may be identified as being of national importance) to be secured to a design agreed with Historic England and the Local Planning Authority (LPA). • Engagement with the local communities through outreach and education. 	<p>detailed in ES Chapter 6 Cultural Heritage, Sections 6.8.4 and 6.8.11 (APP-044) and within the REAC as Commitment CH4 (TR010039/APP/7.5 Rev 1).</p> <p>This has been updated in the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1) and submitted at Deadline 1 under Commitment Ch4 the following statement will be added:</p> <p><i>'This will be monitored for effectiveness during the works and the need for, scope and scale of any further works would be discussed with Peterborough City Council as appropriate'.</i></p>
RR-036-14	<p>The objectives of all fieldwork will be focused on local, regional, and national research themes and agendas. They will be informed by the baseline research for the Desk-Based Assessment undertaken in 2018, the results of the geophysical survey undertaken in 2018, and the programme of minimally intrusive evaluation undertaken between May and June 2020. The objectives will also provide a clear statement of how they will be achieved,</p>	<p>The Second Iteration of the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1) will include as Annex B.8 the Detailed Heritage Written Scheme of Investigation (Mitigation Strategy).</p> <p>Requirement 9 to the Draft Development Consent Order (DCO)(AS-010) 'Archaeological Remains sets out that: —(1) No part of the authorised development is to commence</p>

Reference	Relevant Representation	Applicant's Response
	monitored, and validated through mitigation, and how they are expected to contribute to the value, understanding and dissemination of the cultural heritage assets.	<i>until for that part a written scheme of investigation of areas of archaeological interest, reflecting the relevant mitigation measures set out in the Record of Environmental Actions and Commitments (REAC), has been submitted to and approved in writing by the Secretary of State, following consultation by the undertaker with the relevant planning authority.</i>
RR-036-15	All programmes of archaeological work will be carried out according to Written Schemes of Investigation (WSIs) which must be submitted to, and approved by, the Local Planning Authority. The WSIs will be written by the appointed archaeological contractor undertaking the work in accordance with briefs issued by the LPA archaeological advisor. WSIs submitted by third parties will not be accepted.	<p>The Second Iteration of the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1) will include as Annex B.8 the Detailed Heritage Written Scheme of Investigation (WSI) (Mitigation Strategy).</p> <p>Requirement 9 to the Draft Development Consent Order (DCO) (AS-010) 'Archaeological Remains sets out that:</p> <p style="padding-left: 40px;"><i>—(1) No part of the authorised development is to commence until for that part a written scheme of investigation of areas of archaeological interest, reflecting the relevant mitigation measures set out in the Record or Environmental Actions and Commitments (REAC), has been submitted to and approved in writing by the Secretary of State, following consultation by the undertaker with the relevant planning authority.</i></p>
RR-036-16	All programmes of archaeological work will be carried out in accordance with current standards, guidance and advice provided by the Chartered Institute for Archaeologists, Historic England, and other professional organisations, and will result in appropriate dissemination and archiving. (Level 3 minimum), in consultation with the Conservation Officers.	<p>Mitigation is detailed in the Record of Environmental Actions and Commitments (REAC) within the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1), (Commitments CH1 - CH10).</p> <p>The mitigation is in accordance with current standards, guidance and advice provided by the Chartered Institute for Archaeologists, Historic England, and other professional</p>

Reference	Relevant Representation	Applicant's Response
		organisations, as set out in the Environmental Statement (ES) Chapter 6 Section 6.2 (APP-044).
RR-036-17	Conservation The relevant chapter of the EIA lists the Heritage Assets which may be potentially affected by the proposals and there is general agreement regarding those assets which have the greatest potential to materially impact by the proposals.	The Applicant acknowledges this comment
RR-036-18	Mile Marker There is concern regarding the future treatment of the mile marker currently situated on the north verge of the A47, slightly to the east of the petrol station. As an asset which is intrinsically linked with the road which has been upgraded many times over the course of its history, this further upgrade will to a limited extent alter its context, however, due to the nature of the asset this will not be materially detrimental. The mile marker must be conserved during construction works, with a management plan in place. Subsequent to the work being completed the mile marker must be re-laid as close to its original position as possible on the northern side.	This asset is noted in the Environmental Statement (ES) Appendix 6.1 Cultural Heritage Information (APP-085) as WAN5 – site of former milestone. It was not identified on the site walkover and was presumed to have been removed, along with other milestones confirmed to be absent. However, the location was heavily overgrown at the time of survey. The asset is visible in online images dated Jan 2021 (Google Streetview). The measures in the Record of Environmental Actions and Commitments (REAC) for the heritage mitigation strategy will be amended to include measures to record, protect, remove if needed, conserve/restore and re-install. This has been updated in the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1) and submitted at Deadline 1. The asset will then be proposed for listing to Grade II.
RR-036-19	Conservation Areas There are four Conservation Areas which are within close proximity of the proposed site, Ailsworth, Sutton,	The Applicant acknowledges this comment.

Reference	Relevant Representation	Applicant's Response
	Thornhaugh and Wansford. With regard Ailsworth it already abuts the dual carriageway section of the A47 which forms its northern border and the extension of the dual carriageway is not considered to materially impact it further.	
RR-036-20	In terms of Thornhaugh Conservation Area, the existing A1 is considered to form a sufficient barrier that the proposals, which at nearest points are limited will not be materially impactful.	The Applicant acknowledges this comment.
RR-036-21	<p>There is a concern that despite part of the red line being within the Wansford Conservation Area, no assessment of the impact upon its setting has been carried out. It is accepted that no works are being carried out within this section within the boundary of the Conservation Area, however, substantive alterations will be 100m away. Similar to the situation with regards to Thornhaugh</p> <p>Conservation Area, the works are separated and substantially screened from the Conservation Area by the A1. Although where the proposed new road section the field was historically to the north of Peterborough Road. The by-passing of the village by the A1 has created a substantial barrier to the proposed site from the Conservation Area. As such the relationship between the two is no longer significant and the magnitude of the works within what is already an enclosed space, is not sufficient to be a materially detrimental impact upon the setting of the Wansford Conservation Area.</p>	Wansford Conservation Area (north and south parts) is discussed in Environmental Statement (ES) Appendix 6.1 (APP-085) sections 6.2.20-26, Table 4 on page 63 and Table 5 on page 99). This concludes there is no significant effect and as only potential significant effects are carried forward into the ES Chapter it is not discussed in in ES Chapter 6 (APP-044).

Reference	Relevant Representation	Applicant's Response
RR-036-22	<p>Sutton Conservation Area</p> <p>Sutton has over the course of the 20thC become more isolated as a village due to the loss of the active ford and the upgrading of the A47. The proposals will continue this trend, reducing the active access points to one. This access is not historical having become substantive around the turn of the 20thC. Conversely the proposals stop the active usage of The Drift, the historic main access.</p> <p>There is a clear preference for historical accesses to be maintained and there does not appear to be any justification in this instance for its truncation, considering that the route will be maintained but just blocked. It is recommended that the blocking of the access be removed from the proposals.</p> <p>If access is blocked it is essential the manner in which access is denied does not undermine the clear appreciation of The Drift as the main and historical access. In addition the works should not undermine the holistic maintenance of the tree avenue.</p> <p>The existing A47 is heard from the otherwise quite tranquil village and is partially visible in northward views. These existing aspects of the A47 are considered to have a limited detrimental impact upon the setting of the Conservation Area. The proposal will to a limited extent exacerbate the existing detrimental aspects, however, due to the landscaping and distance these impacts and not considered materially detrimental.</p>	<p>Please refer to Common Response C.</p>

Reference	Relevant Representation	Applicant's Response
RR-036-23	<p>Model Farmhouse</p> <p>The proposals do not materially impact the setting of the Grade II Listed building as the works are minor and for the ease of highway access. It has been raised that the curtilage listed northern wall could potentially be structurally impacted as a consequence of the carrying out of the works. Works which undermine the integrity of Listed buildings should be avoided, however, it is noted in this instance the issues may be structural and the onset of the proposed works may just hasten an underlying issue. The mitigation measure of a structural survey and a construction risk assessment as has been suggested are considered prudent and reasonable.</p> <p>If resulting from the assessment it is deemed that the wall requires substantive preventative measures, there would be an expectation of a Level 2 Historical Building recording of the wall prior to works being carried out. If the wall is considered to be unstable and requires substantive rebuilding, then a Level 3 Historical Building Recording with a laser scan would be expected.</p>	<p>Recording will be undertaken to Level 2 according to Historic England's guidance for investigating and recording historic buildings and has been updated in the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1) and submitted at Deadline 1 in the Record of Environmental Actions and Commitments (REAC), Commitment CH4.</p> <p>The need for and methods of any further recording required would be determined by the results of the structural assessment and ongoing monitoring, to be agreed with Historic England and Peterborough City Council through the Detailed Heritage Written Scheme of Investigation (Mitigation Strategy).</p>
RR-036-24	<p>Railway Buildings</p> <p>The proposals require the demolition of the Locally Listed Sutton Station. Locally Listed buildings are NDHA's for the purposes of NPPF paragraph 203 for which balanced judgment regarding the scale of the harm on the asset is required. As such the total loss is considered to be less than substantial harm. There is a presumption in favour of the retention in situ and viable for future use of Locally Listed Heritage Assets. The existing building is considered</p>	<p>Please refer to Common Response G.</p>

Reference	Relevant Representation	Applicant's Response
	viable with no identified structural deficiencies identified and as such there is a principle objection to this proposal.	
RR-036-25	It is understood however that due to other constraints which are hierarchically more significant for which the resulting alignment has been designed to avoid, this has given rise to a need to demolish the Locally Listed Building. Although it would be possible for only partial demolition, the proposed mitigation of allowing the relocation of the station is considered preferable as this would also mitigate the impact of the loss of the station building.	Please refer to Common Response G.
RR-036-26	In terms of mitigation there is agreement with the suggestion for Historic Building Recording and its proposed extent, however, there is disagreement with the proposed level 3. As the relocation would break up the collection of Locally Listed railway buildings, a Level 4 Building Recording should be undertaken upon the former Station Building. The main difference between the two levels is the extent of research which would be required and this information would be essential for the buildings interpretation going forward.	<p>The scope and requirements of recording will be discussed with the relevant consultees as part of the development of the Detailed Heritage Written Scheme of Investigation (WSI) (Mitigation Strategy) and under Requirement 9 to the Draft Development Consent Order (DCO) (AS-010).</p> <p>As noted above, relocation is dependent on third parties and it may therefore be more appropriate for the additional archive research to form part of the third party works.</p>
RR-036-27	There is no further information regarding the future treatment of the gate piers. These should if possible be reused on the site, however if this is not practical they should remain with the station.	The gate piers are to be recorded as part of the station and removed as detailed in Record of Environmental Actions and Commitments (REAC) of the Environmental Management Plan (TR010039/APP/7.5 Rev 1).
RR-036-28	Wildlife The proposed mitigation and compensation is sufficient for	This response has been noted.

Reference	Relevant Representation	Applicant's Response
	the proposed work for the council's material concerns to be discounted. The assessment and comments section includes several requests for clarification on mitigation and compensation requested.	
RR-036-29 WBD to review	The biodiversity chapter of the Ecological Impact Assessment (Highways England, 2021) goes into detail of the current ecological baseline of the area potentially impacted by the proposed development. These surveys are extensive and complete in their scope with the exception of the Great Crested Newt surveys. The mitigation and compensation for Great Crested Newts is well understood and subsequent requirements can be included within the Ecological Mitigation Plan.	<p>Record of Environmental Actions and Commitments (REAC) Commitment BD10 within the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1) states the following:</p> <p><i>If this species is found present within 500m of the Scheme in the remaining surveys (that could not be completed due to covid-19), then works would need to be undertaken in those parts of the site affected under a Natural England mitigation license. It would be necessary to find or create suitable receptor sites (either within Scheme boundary or through landowner agreement) that include both breeding and terrestrial habitat. Newts would be removed from the area of works prior to commencement.</i></p> <p>Mitigation (if required) will be reported in the Second Iteration EMP (TR010039/APP/7.5 Rev 1).</p>
RR-036-30	<p>Tables 8-11, 8-12, 8-13 and 8-14 within the EIA detail the compensation and mitigation required over the construction and operational phase of the development. The following paragraphs are comments and advisements on the proposed mitigation and compensation.</p> <p>It is noted that as compensation unimproved calcareous grassland will be created in order to compensate for the loss of grassland from the Sutton Meadows CWS. The</p>	The Applicant acknowledges this comment.

Reference	Relevant Representation	Applicant's Response
	creation of this grassland will be detailed within the EMP. This is encouraged however the seed mix to be used in replanting must be considered carefully. The seed mix should either be collected from cuttings on site or created from the botanical species lists created.	
RR-036-31	The methodology for the translocation of hedges should be considered as compensation rather than mitigation. Hedges which have been identified to be translocated should be risk assessed for the potential of failure after translocation. Any potential for failure of translocation should have a backup plan for replacement of the habitat appropriate to the potential loss of hedge. The loss of hedgerows and the failure of translocated hedges is the largest concern for the EIA.	As stated in BD3 of the Record of Environmental Actions and Commitments (REAC) table in the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1), the Principal Contractor must ensure any hedgerow deemed species rich or 'important' will be translocated and not lost, with locations provided in the Landscape Environmental Management Plan (LEMP) (to be included in the EMP Second Iteration). Species poor hedgerows will be gap filled to increase species diversity and quality across the site. New species rich hedgerows with trees will be planted in addition to deciduous woodland.
RR-036-32	It is noted that rather than creating a wildlife tunnel the old disused railway will be used. While this is acceptable for the current scheme, it is known that there is interest to use the dismantled railway as a cycleway from Sutton to Barnack. Has the potential for the installation of a secondary Wildlife Tunnel been ruled out of the proposed design already?	The provision of a new wildlife tunnel has not been identified as a required mitigation for biodiversity. ES Chapter 8 Biodiversity (APP) and the EMP (TR010039/APP/7.5 Rev 1) set out mitigation that has been identified as required.
RR-036-33	The potential Invasive Non-Native Species found on site should be included within any tool box talk performed on site.	Table 1.9 of the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1) sets out the topics to be included in the tool box talks, which include non-native species. To prevent or minimise the introduction or spread of Invasive

Reference	Relevant Representation	Applicant's Response
		Non Native Species (INNS) during construction, an INNS Management Plan would be prepared (see Record of Environmental Actions and Commitments (REAC) commitment BD6 within the EMP (TR010039/APP/7.5 Rev 1). This would contain appropriate treatment methods to ensure that construction proceeds within the legal framework to ensure prevention of spread both within and beyond the Scheme boundary.
RR-036-34	Landscape Implications Insufficient information has been submitted to make an informed decision/recommendation regarding the above proposals and a number of tree issues.	No response required
RR-036-35	Required amendments/information: The detail within the Arboricultural Impact Assessment (AIA) from ADAS is not clear throughout with regards to the trees to be removed/retained. Confirmation is required with regards to the retention of trees; T.97 & T.98, T.104, T.113 & T.115/T.116 & T.117 in particular.	The Arboricultural Impact Assessment (AIA) is provided in Appendix 7.6 of the Environmental Statement (ES) (APP-097). It contains schedules and plans identifying areas of proposed tree removal. These schedules and plans identify that all of the seven trees listed here would be retained.
RR-036-36	Amendments should be made to retain T.18 if at all possible, as it may be possible to 'work around' this particular tree. Tree replacement numbers within the planting proposals should include additional mitigation planting numbers for direct loss of Category A & B trees to comply with the Council's Local Plan Policy LP29.	T18 (category A Oak) is identified as likely to be felled because its root protection area extends into the footprint of the proposed highway embankment. The Environmental Masterplan (AS-021) shows the current proposals for tree planting. Requirement 5 of the draft DCO (AS-021) sets out the requirements for a landscaping scheme, which must include planting details.
RR-036-37	A suitable condition should be included in any future	The applicant considers that the landscape proposals set out

Reference	Relevant Representation	Applicant's Response
	<p>planning approval securing the proposed landscaping/planting scheme for the overall development area within the Environmental Masterplan (EM), as previously advised when commenting on the Draft EM, dated 9th May 2021, below:</p> <p>Sheet 1: Ref EFB – Please provide details of the proposed replacement tree and shrub planting to compensate for losses along improved access.</p> <p>Sheet 2: Ref EFB – Please include additional trees within the full length of the hedgerow in question, south of the stream.</p> <p>Sheet 3: Ref EFB/EFA – Please include additional trees within the full length of the hedgerow in question, towards and ending west of the Pumping Station.</p> <p>Sheet 4: Ref EFD/EFB – Please include trees within the full length of the hedgerow in question, to help channel bats to the disused railway tunnel.</p> <p>Also, Ref EFD – Please consider planting local provenance – East Anglian, native Black Poplar – <i>Populus nigra</i> var 'Betulifolia' adjacent to river, to offer greater value in reinforcing character and biodiversity to the CWS.</p> <p>Sheet 5: Ref EFB – Please include additional trees within the full length of the hedgerow scheme in question, both north of the road junction, on the eastern side of Sutton Heath Road (SHR), and south of the last tree on the</p>	<p>within the submitted Environmental Masterplan (AS-021) provide the necessary and adequate mitigation of the potential landscape and visual effects of the Scheme.</p> <p>The matters raised here by Peterborough City Council are matters of detailed landscape design and would not alter the levels of residual landscape and visual effects reported in Chapter 7 of the submitted ES (APP-045).</p> <p>Peterborough City Council will be consulted as part of the Stage 5 Detailed Design (see Requirement 3 of the draft Development Consent Order (DCO) (AS-010)).</p>

Reference	Relevant Representation	Applicant's Response
	<p>eastern side of SHR before end of Sheet 5 and continuing onto Sheet 6.</p> <p>Sheet 5A Inset: Ref EFF – Please provide details of the proposed replacement/compensatory tree planting within the setting of the listed farm building.</p> <p>Also, Ref EFB – Please include trees within new section of replacement hedgerow, removed to straighten road.</p> <p>Sheet 6: Ref EFA – Please include additional trees within the full length of the hedgerow in question, south of the road from Sutton, adjacent to the strip of agricultural land to be restored.</p> <p>Sheet 7: Ref EFA – Please include trees within section of hedgerow, to help screen views of traffic movements in views from Sutton.</p>	
RR-036-38	<p>The Council has a statutory duty to consider the Town and Country Planning Act 1990 and Section 197 – regarding the protection and planting of trees when considering any proposed development.</p> <p>The Council's Peterborough Local Plan 2016 to 2036, adopted 24th July 2019, Policy LP29: Trees and Woodland including reference to BS5837:2012 Trees in relation to design, demolition and construction – Recommendations, helps to protect and retain trees, as does the Council's Peterborough Tree and Woodland Strategy 2018-2028. Policy TP40.1-7.</p>	<p>Chapter 8 (section 8.3.1) of the Environmental Statement (ES), Biodiversity (AS-015) recognises the importance of Policy LP28 of the Peterborough Local Plan 2019. The design has evolved with the aim of avoiding trees where possible and habitat loss kept to the minimum.</p> <p>Planting of trees will take place as part of the Scheme as shown on the Environmental Masterplan (AS-021).</p>

Reference	Relevant Representation	Applicant's Response
RR-036-39	Environmental and Pollution Control There are no objections to the proposal subject to the monitoring described in section 11.1 of the Environmental Statement and effective implementation of mitigation measures to minimise adverse impacts in section 11.9 of the Environmental Statement.	This response has been noted.
RR-036-40	<p>In addition to the above mitigation measures, best practicable means for noise and vibration mitigation should be employed in conjunction with the British Standard (BS) 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise and BS 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 2: Vibration.</p> <p>Best Practicable Means should also be used for all overnight lighting requirements and for the control of dust during construction.</p> <p>It is recommended that a Section 61 prior consent application under the Control of Pollution Act 1974 be made for the entirety of the works once a schedule of works has been 124obilizat. This will be particularly important for night-time works once the scope and duration of such works have been defined.</p>	<p>A Construction Noise and Dust Management Plan will be developed as part of the Second Iteration of the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1) (Annex B.3). This will include a commitment to best practicable means for noise and vibration mitigation and measures from British Standard (BS) 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise and BS 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 2: Vibration.</p> <p>The Construction Noise and Dust Management Plan will include a commitment to consult with Peterborough City Council through a Section 61 application or a less formal means as necessary, where the Principal Contractor's preferred plant departs considerably from the assumptions within Appendix 11.5 of the Environmental Statement (ES) (APP-127), or where works outside of the normal construction hours are unavoidable (for example certain tie-in works).</p>
RR-036-41	Further Detailed Construction Noise/Vibration Assessments to include:	The further information requested, is required by the following Record of Environmental Actions and Commitments (REAC)

Reference	Relevant Representation	Applicant's Response
	<ul style="list-style-type: none"> The precise locations and heights of the temporary barriers is to be determined by the Principal Contractor and confirmed to the local authority as part of the further detailed construction noise assessments. Tie-in construction works are likely to occur during the night-time period. No plant information is available for these works at this stage; however, it is possible that moderate or major adverse impacts could occur because of these works. It is considered unlikely that the tie in works would occur adjacent to individual receptors for 10 or more days or nights in any 15 consecutive days or nights (or for a total number of days or nights exceeding 40 in any six consecutive months) and therefore noise from tie-in works is unlikely to constitute a significant effect. Due to the sensitive period during which these works will occur, the Principal Contractor shall implement mitigation including further detailed assessments and the application of best practicable means of noise control. Further detailed construction noise assessments for any overnight or weekend works where these could affect sensitive receptors for 10 or more days or nights in any 15 consecutive days or nights. There are likely to be extended working hours in the summer months to take advantage of the daylight or weather. These will need to be considered in further detail as construction 	<p>commitments within the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1):</p> <p>EMP page 87 (TR010039/APP/7.5 Rev 1) states: <i>"Assessment of Construction Noise and Vibration where the Principal Contractor's preferred plant departs considerably from the assumptions within Appendix 11.5 of the Environmental Statement, or where works outside of the normal construction hours are unavoidable (for example certain tie-in works)".</i> Where this is required, the Principal Contractor will consult with the Local Authority by Section 61 Control of Pollution Act application or less formal means as necessary.</p> <p>REAC commitment NV2 (TR010039/APP/7.5 Rev 1):</p> <p>"The precise locations and heights of the temporary barriers is to be determined by the Principal Contractor and confirmed to the local authority as part of the further detailed construction noise assessments".</p> <p>REAC commitment G1 (TR010039/APP/7.5 Rev 1):</p> <p><i>"Construction works will take place mainly during the daytime. Construction works outside of normal construction hours of 07:00-19:00 weekdays and 07:00-19:00 on Saturdays"</i> <i>"Night working may take place from 20:00- 06:00. There may be exceptions to these hours for oversized deliveries, and junction tie-ins. There are likely to be</i></p>

Reference	Relevant Representation	Applicant's Response
	<p>methods are refined and proposals for night-time work discussed and agreed with the environmental health department at the Local Authority.</p> <ul style="list-style-type: none"> Vibration from the static works such as structure formation could occur for longer durations and shall be considered in further detailed construction vibration assessments by the Principal Contractor on the basis of 126obilizat work durations. Sufficient detail on plant types, duration, and location 	<p><i>extended working hours in the summer months to take advantage of the daylight or weather.</i> <i>Where works outside of these hours are unavoidable, the Project Coordinator (PC) will consult with the local planning authority, and agree appropriate methods of mitigation that account for the location of works, hours of work and expected duration."</i></p> <p>Environmental Management Plan (EMP) Section 1.3.6 (TR010039/APP/7.5 Rev 1).</p> <p><i>"there are likely to be extended working hours in the summer months to take advantage of the daylight or weather. Any works undertaken out-with the hours stated above or works required during hours of darkness will be agreed with the local planning authority"</i></p> <p>REAC commitment NV1 (TR010039/APP/7.5 Rev 1):</p> <p><i>"The contractor is to assess noise and vibration for the construction stages and locations that have been determined in the Environmental Statement (ES), based on the precise locations of plant and durations of work, and set the location of the barrier/solid site hoarding so that provides screening to the residential receptors that are identified where necessary and possible."</i></p> <p>The 2nd iteration EMP (TR010039/APP/7.5 Rev 1) will set out</p>

Reference	Relevant Representation	Applicant's Response
		details on plant types, working hours, etc. The Principal Contractor's Construction Noise and Dust Management Plan will set out further detailed mitigation.
RR-036-42	Points noted from the Environmental Statement in respect to	No response required.
RR-036-43	<p>Air Quality</p> <p>As construction activities are programmed to last less than two years, it is unlikely there would be a significant effect on air quality or affect the UK's ability to comply with the Air Quality Directive. The Construction traffic assessment was therefore screened out of the assessment.</p> <p>With the recommendation of best practice construction mitigation measures in place, the impact of construction dust is considered highly unlikely to trigger a significant air quality effect. Therefore, in accordance with LA 105, no significant effects on sensitive receptors have been identified.</p> <p>The air quality assessment has concluded there would be no significant effects on air quality at human and ecological receptors as a result of the Proposed Scheme.</p>	This response has been noted.
RR-036-44	<p>Noise</p> <p>Construction Noise:</p> <ul style="list-style-type: none"> The majority of the construction work will take place during the daytime and on Saturday afternoons; typical construction times will be between 07:00-19:00 on weekdays and Saturdays. 11.5.4. Night- 	<p>This response has been noted.</p> <p>These are statements from Environmental Statement (ES) Chapter 11 Noise and Vibration (APP-049). The mitigation requirements, including the requirement for additional assessments are included in Record of Environmental Actions</p>

Reference	Relevant Representation	Applicant's Response
	<p>time or weekend works will be required at some stages, such as, road tie-ins and traffic management. Night works will take place from 20:00- 06:00. There may be exceptions to these hours for oversized deliveries, and junction tie-ins.</p> <ul style="list-style-type: none"> • Subject to the provision of temporary noise barriers, implementation of best practicable means, construction noise monitoring where required, use of trunk roads only for diversion routes, and the mitigation measures described within Section 11.9, construction noise is not predicted to result in any significant adverse residual effects. • A construction noise assessment has been undertaken, identifying that adverse impacts that are likely to constitute significant effects would occur without mitigation at some of the receptors closest to construction works. Suitable means of minimising the potential for significant adverse have been presented including the provision of acoustic barriers. • Where all mitigation is implemented effectively, significant residual construction noise effects are not expected. • Temporary noise barriers are predicted to mitigate the potential for significant noise effects at all receptors, with the exception of 6, 8, 10 and 12 Great North Road, where a moderate adverse impact is predicted during the preworks, phase 1, and stage 5 works when works occur outside daytime hours. 	<p>and Commitments (REAC) commitments NV1-NV3) within the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1).</p>

Reference	Relevant Representation	Applicant's Response
	<ul style="list-style-type: none"> Construction works in the vicinity of these receptors should therefore not occur during the proposed weekend hours of 1300 – 1900 where possible. Where this is not possible, the Principal Contractor shall implement mitigation including further detailed assessments and the application of best practicable means of noise control. 	
RR-036-45	<p>Construction Traffic:</p> <ul style="list-style-type: none"> A construction traffic assessment has been undertaken. It is concluded that, provided that the anticipated vehicle movements and routes are restricted as defined in the Outline Traffic Management Plan (TR010039/APP /7.6) potential significant effects are unlikely. 	This response has been noted.
RR-036-46	<p>Diversion routes:</p> <ul style="list-style-type: none"> Consideration has been given to the traffic diversion routes during road closures required to undertake the construction works. It is concluded that, provided diversion routes utilise trunk roads where possible, the noise increase due to diverted traffic is not likely to constitute a significant effect. Should it be determined that local roads need to be used as diversion routes, mitigation measures, including use of varying routes, and advance notice to residents, are proposed. 	This response has been noted. The mitigation measures are set out in Record of Environmental Actions and Commitments (REAC) (commitments NV1-NV3 within the Environmental Management Plan (EMP)) (TR010039/APP/7.5 Rev 1). Community relations officer will be appointed during construction to keep residents informed as outlined in Table 1.4 of the EMP (TR010039/APP/7.5 Rev 1).
RR-036-47	<p>Operational Noise:</p> <ul style="list-style-type: none"> The assessment of operational noise includes 	This response has been noted.

Reference	Relevant Representation	Applicant's Response
	<p>embedded mitigation in the form of a low noise surface along high-speed sections of the Proposed Scheme. The assessment of operational noise demonstrates that there are no significant adverse or significant beneficial noise effects expected due to changes in road traffic noise. This applies at all receptors within the study area and the NIAs identified.</p>	
RR-036-48	<p>Vibration:</p> <ul style="list-style-type: none"> An assessment of potential construction vibration impacts has identified that significant effects would occur without mitigation at the closest receptors to vibration-generating activities. Therefore, prior warning of residents, pre-condition building surveys, restrictions on the timings of the works, and vibration monitoring are proposed as mitigation at the closest properties to these works. The Proposed Scheme is not predicted to give rise to significant vibration effects subject to monitoring and effective implementation of the identified mitigation. Vibration from the static works such as structure formation could occur for longer durations and shall be considered in further detailed construction vibration assessments by the Principal Contractor on the basis of finalised work durations. 	<p>This response has been noted. The mitigation measures are stated in Record of Environmental Actions and Commitments (REAC) commitment NV1 within the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1).</p>
RR-036-49	<p>Communication:</p> <p>The potential effects of construction noise and vibration on</p>	<p>The mitigation measures are stated in Record of Environmental Actions and Commitments (REAC) commitment G7 within the</p>

Reference	Relevant Representation	Applicant's Response
	local community receptors can be lessened by effective communication. Good public relations are invaluable in securing public acceptance of construction noise. People are typically more tolerant of construction noise and vibration if they understand the reason for it, the likely duration, start and finish dates, and that measures are being employed to reduce noise and vibration as far as practicable. Letter drops explaining this would aid communication with the local community. A dedicated site contact for the public and a complaints handling procedure shall also be put in place.	Environmental Management Plan (EMP)(TR010039/APP/7.5 Rev 1). Commitment G7 states: <i>"A Community Relations Officer will be appointed who will be responsible for these specific tasks and will prepare a community relations strategy to outline how these tasks will be undertaken. A forum will be established to disseminate construction information to the consultees"</i>
RR-036-50	<p>Drainage There are no concerns in principle with the proposed surface water drainage strategy for the proposed scheme. However, the following information is required prior to the commencement of any phase of the scheme, which can be provided by way of condition as part of the detailed design:</p> <ul style="list-style-type: none"> • The condition survey of Mill Stream and Wittering Brook, including details of any existing assets or structures. • The temporary drainage strategy for the proposed scheme for all phases of construction, which should include but is not limited to; <ul style="list-style-type: none"> ○ Clarification of how all surface water will be collected and managed on site during the construction. ○ Details of how silts will be managed and controlled prior to any outfall. 	<p>Commitment RD3 in the Record of Environmental Actions and Commitments (REAC) within the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1) details that a temporary surface water drainage strategy will be developed and incorporated into the Second Iteration EMP.</p> <p>The requirement to consult with Peterborough City Council is secured through Requirement 4 'Environmental management plan' to the Draft Development Consent Order (DCO) (AS-010).</p>

Reference	Relevant Representation	Applicant's Response
	<p>A phasing plan, including a timeline for its implementation.</p> <ul style="list-style-type: none"> ○ Details of any pollution and water quality controls. ○ Details of all temporary drainage assets, which includes but is not limited to, construction details, clarification regarding proposed permanent and temporary structures and their trigger for removal. ○ A demonstration of the overland flood flow / exceedance routes for each phase of the construction. ○ Construction maintenance, management and any remediation schedules required as parts of the works. 	
RR-036-51	<ul style="list-style-type: none"> • The details of any further ground investigation. 	<p>Supplementary ground investigation (GI) works are scheduled for 2022. This GI will target areas where information is currently limited, such as the eastern portion of the proposed alignment that has been moved northwards since GI works in 2018.</p> <p>The GI will also target areas of concern in terms of existing areas of earthwork instability, such that appropriate solutions can be designed to mitigate any slope slippage risks identified.</p> <p>Investigative techniques include drilling of boreholes, excavation of trial pits, in-situ testing including strength tests, and infiltration tests to aid design of proposed attenuation ponds within the Scheme.</p>

Reference	Relevant Representation	Applicant's Response
RR-036-52	<ul style="list-style-type: none"> A full and up to date surface water drainage strategy for the operational scheme, which includes but is not limited to the following: <ul style="list-style-type: none"> Information about the design storm period and intensity, discharge rates and volumes (both pre and post development), means of access for maintenance, the methods employed to delay and control the surface water discharged from the site and the measures taken to prevent flooding and pollution of the receiving groundwater and/or surface waters; Any works required off-site to ensure adequate discharge of surface water without causing flooding or pollution (which should include refurbishment of existing culverts and headwalls or removal of unused culverts where relevant); A timeline for its implementation; Full and up to date drainage strategy drawings; Construction/ technical details of all drainage assets; Cross sections for all attenuation and infiltration basins; Details of the erosion protection measures for all proposed outfalls and the proposed interception drainage; Confirmation of the surface water drainage proposals at Upton Drift Road; Final overland flood flow routes/exceedance 	<p>Record of Environmental Actions and Commitments (REAC) Commitments RD6 – RD11 within Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1), define measures which will be implemented to protect receiving waterbodies from any impact from the Scheme. Delivery of these commitments, including the requirement to consult Peterborough City Council is secured through Requirement 4 'Environmental Management Plan' to the Draft DCO (AS-010).</p> <p>The commitments RD6-RD11 in the REAC within the EMP (TR010039/APP/7.5 Rev 1) will be developed and incorporated into the Second Iteration of the EMP.</p>

Reference	Relevant Representation	Applicant's Response
	<p>routes;</p> <ul style="list-style-type: none"> ○ A management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by an appropriate public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. <p>Once approved, the scheme shall be implemented, retained, managed and maintained in accordance with the approved details. Reason: To prevent the increased risk of flooding, to improve and protect water quality, improve habitat and amenity, and ensure future maintenance of the surface water drainage system.</p>	
RR-036-53	<p>Additional Comments</p> <p>We recommend that the Environment Agency are consulted in relation to any proposed works to or within designated main river, the Water Framework Directive, River Nene compensatory flood storage area.</p>	<p>The Environment Agency has been and will continue to be consulted on all works which may impact the designated Environment Agency (EA) Main Rivers, this includes the application for a Flood Risk Activity Permit as set out in Record of Environmental Actions and Commitments (REAC) commitment RD6 within the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1) for any works within 8m of EA Main River bank.</p> <p>A Water Framework Directive (WFD) compliance assessment will also form part of the EA consultation procedure. Delivery of the commitments set out in the REAC, including the requirement to consult Peterborough City Council and the Environment Agency will be secured through Requirement 4</p>

A47 Wansford to Sutton Dualling

Applicant's Response to Relevant Representations

Reference	Relevant Representation	Applicant's Response
		<p>'Environmental Management Plan' of the Development Consent Order (DCO) (to be submitted at Deadline 3).</p> <p>Requirement 8, to the Draft DCO (to be submitted at Deadline 3) Surface and foul water drainage will include consultation with the EA.</p>

41 RR-037 PETERBOROUGH CYCLE FORUM

Reference	Relevant Representation	Applicant's Response
RR-037-1	<p>Peterborough Cycle Forum is pleased to note the scheme will deliver significant benefits for cycling, including an east-west segregated cycle route and a south-north grade separated crossing of the A47. However, the plans fail to provide a safe and fully accessible route for cycling between Wansford and all communities and destinations east of the A1. They do not meet the stated objective to 'provide a safer route between communities for cycling' and they fail to comply with the Equality Act 2010 and many national and local policies. Peterborough Cycle Forum requests the plans are not approved in their present form. At the Wansford end, the designated cycle route follows a 50 metre long concrete ramp on which the gradient averages 15% and in places reaches 20%. This greatly exceeds the National Highways standard of 4%. This section is a permissive footpath (ID574) on which cycling is not permitted. National Highways has confirmed that cyclists must dismount and walk up / down the ramp. This is inconvenient for the majority, but physically impossible for a minority who include riders of non-standard cycles such as cargo bikes or cycles with a child trailer, also older people, of whom an increasing number ride e-bikes which are heavy to push and only power assisted when pedalled. There are those who can neither push nor pedal their cycle up a 20% gradient and so changing the status of the path would not resolve the issue. In a recent test, someone who rides a recumbent tricycle as a mobility aid was unable to ascend the ramp when the ground was wet, due to lack of traction on the</p>	<p>Please refer to Common Response A.</p> <p>The cul-de-sac service road providing vehicular access to the Wansford picnic area and pumping station is currently closed due to the previous history of antisocial behaviour. The service road will form part of the new link road serving the petrol filling station and Sacrewell Farm to be provided as part of the Scheme. It is envisaged that provision of the new link road would also resolve the antisocial behaviour issue associated with the picnic area since it will be trafficked throughout the day.</p> <p>Please refer to Common Response C.</p> <p>The Applicant is considering mitigation regarding the concerns mentioned and discussion with Peterborough City Council will continue. A meeting was held with the Applicant and Peterborough Council on the 23 February 2021 to discuss the Scheme proposals and current antisocial behaviors in the vicinity of the works. (The Applicant is looking to develop a Statement of Common Ground with Peterborough City Council (an initial draft of which will be submitted at Deadline 3) where details of these discussions will be included).</p>

Reference	Relevant Representation	Applicant's Response
	<p>slippery surface. Her impairment meant she was unable to dismount and push her machine up the steep slope. East of the A1, a new designated funds route connects the former picnic site with the bottom of the ramp, replacing part of permissive path 574 which followed a steeper course over rough ground. National Highways claims it has provided a connection into pre-existing cycle routes. This is incorrect; the concrete ramp has never been part of a cycle route. The new route terminates underneath the A1, taking cyclists to the bottom of a ramp which some are then unable to climb. When the designated funds path was first proposed, Peterborough Cycle Forum (PCF) suggested designs which could have significantly reduced the gradient west of the A1, but the simplest, lowest cost option was taken and the gradient remained unchanged.</p> <p>Apart from the gradient, many people are unable to use the route due to concerns over personal safety and security. The route is not overlooked, is unlit, has a blind right-angled turn and is flanked by high vegetation. The area between the underpass and former picnic site has a history of anti-social behaviour and many will not walk the route alone, even during daylight hours. Under existing proposals, the only route fully accessible to all cyclists will be as follows: Westbound, from the filling station: follow the southern arm of the eastern roundabout, turn left at the roundabout, cross the bridge over the A1, turn left at the western roundabout into Old North Road. This route is hazardous. It involves riding on-carriageway in very heavy traffic between the eastern and western roundabouts, with the carriageway forming two narrow lanes before the</p>	

Reference	Relevant Representation	Applicant's Response
	<p>western roundabout. Eastbound, from Old North Road: turn right at the western roundabout, cross the bridge over the A1, turn right at the eastern roundabout into the southern arm. This route is extremely hazardous. To join the roundabout from Old North Road, a cyclist must cross two lanes of very heavy traffic. Vehicles can approach at speed from the eastern arm and the road layout contributes to many vehicle movements being unpredictable. After turning right at the western roundabout the cyclist must ride on-carriageway and cross two lanes of heavy traffic in order to turn right at the eastern roundabout. The speed limit between the roundabouts is 60mph and both carriageways are used by a high number of HGVs. A very experienced and confident cyclist may be willing to follow this route, but a cycle route must be safe and fully accessible to all, aged 8 to 80, of any level of experience or ability. The suitability of any route should be judged at an individual, human level. Is this route safe, for example, for: 1. A young mother from Wansford towing a toddler in a trailer, to access child care in Castor 2. An 11 year old from Sutton, visiting a school friend in Wansford 3. A 75 year old from Wansford, riding an e-bike to visit family in Upton If a fully accessible cycle route, between Sutton and Wansford, cannot not be provided via the A1 underpass, then a safe route must be provided via the A47 over-bridge, linking the new southern arm of the eastern roundabout with Old North Road, Wansford. National Highways has confirmed that westbound traffic will continue to travel across the A1 bridge in a single lane. PCF believes there is sufficient width to create a bi-directional shared used path on the</p>	

Reference	Relevant Representation	Applicant's Response
	<p>south side of the bridge, adjacent the westbound carriageway. Pedestrians currently cross the A1 via a 2.2 metre wide path between the parapet and crash barrier, despite the ground being very rough on either side of the bridge with no clearly defined path. The 1.3 metre high parapet meets pedestrian standards but is 10cms below the National Highways standard for cycle traffic. National Highways asserts it is not possible to adapt the parapet for cycle use due structural weaknesses. For the same reason, it has said it is not possible to make any other alteration on the bridge, for example, repositioning the open box barrier. The total width of the westbound corridor is 10.5 metres, from parapet to offside kerb, and PCF believes it must be possible to create a safe cycle route within this space. No tangible evidence has been provided to indicate the bridge cannot be adapted to accommodate cyclists and PCF would welcome an examination and report by an independent structural engineer. PCF questions whether the view expressed by National Highways to date is determined not by the ability to devise an engineering solution to what is surely not an insurmountable problem but rather by the cost of implementing a solution (which may include traffic management to facilitate work above the A1). Within a scheme costing £100 million or more, lack of funding is not an acceptable reason for failing to provide a safe cycle route.</p> <p>The focus of this submission is on the western end of the scheme, but Peterborough Cycle Forum also strongly recommends provision of a second grade separated</p>	

A47 Wansford to Sutton Dualling

Applicant's Response to Relevant Representations

Reference	Relevant Representation	Applicant's Response
	crossing of the A47 to connect Upton Road with Peterborough Road. Opportunity could be taken to install an underpass during major work in the area of the existing roundabout. Without this link, the distance of a return journey by cycle, between Upton and destinations to the east, will be increased by more than 4km. This submission is only a summary view and there are further details which Peterborough Cycle Forum would like to put in front of the Inspector.	

42 RR-038 RICHARD JAMES CLARKE

Reference	Relevant Representation	Applicant's Response
RR-038-1	I live in [] Wansford and I am a chartered engineer with more than 40 years experience of planning infrastructure projects. I have sat in many hours of A47 meetings and have been dismayed at how process rather than judgement has driven the proceedings. The project is much needed and the eastern section is sensible and well thought out. The two main difficulties have been the failure to include the Wansford western roundabout in the scheme and the complete lack of balance with respect to the Scheduled Monument at Sacrewell.	See response below.
RR-038-2	<p>These have resulted in an uneconomic design with considerable geotechnical risks. The key objectives of the Scheme are published as:</p> <ul style="list-style-type: none"> Supporting economic growth: The scheme will improve journey times and journey time reliability. This will help contribute to sustainable economic growth by providing benefits such as effectively bringing businesses closer together and encouraging more people to join the labour market as a result of reduced commuting costs. The failure to address the western roundabout will lead to delays which will negate most of the time savings from the project. Making a safer network: Improving road safety for all road users by designing to modern highway standards appropriate for a major A road. The western roundabout is not appropriate for a major trunk road junction and it will become 	Please refer to Common Responses B and D.

Reference	Relevant Representation	Applicant's Response
	<p>increasingly dangerous as traffic increases. The likely victims will be Wansford residents.</p> <ul style="list-style-type: none"> Providing a more free-flowing network: Increasing the resilience of the A1 / A47 junction to cope with incidents such as collisions, breakdowns, maintenance and extreme weather. The improved A47 section from Wansford to Sutton will be more reliable, reducing journey times and providing capacity for future traffic growth. Only half the junction has been addressed and the remaining half has no resilience and will incur increasing delays. 	
RR-038-3	<ul style="list-style-type: none"> Creating an accessible and integrated network: Ensuring the proposals take into account the local communities access to the road network, and provide a safer route between communities for walking, cycling, horse riding and other road users. A network has not been created. The scheme improves the A47 corridor but the network fails because of the A1/A47 junction. Access to the A47 from Wansford will become increasingly difficult. The WCHR provision would have been much better with an alternative scheme. National Highways have failed to achieve any of the four key objectives. The Scheduled Monument has always been treated by the project team as if it were holy ground. In reality the southern half of the area is two ploughed out barrows or roundhouses but National Highways have said "It is not their role 	Please refer to Common Responses A and H.

Reference	Relevant Representation	Applicant's Response
	to challenge other government departments". A route through the south of the monument would do no damage to identified features, removes most disruption during construction, allows much better WCHR provision using the old road and gets away from the unstable escarpment at the river Nene. The project team should look again at the western part of the scheme, including allowance for the future upgrading of the A1.	

43 RR-039 ROBERT REID

Reference	Relevant Representation	Applicant's Response
RR-039-1	Dear Planning Inspectorate Overall I am in favour of this scheme since the Statutory Consultation, the new team at Bedford has engaged and continued to have mini consultations in developing the scheme. We have a small farm in the middle of the project mainly all of the County Wildlife Site, and one of our main concerns has been how the environment and wildlife will be challenged by the scheme. The geography is challenging with the River Nene, floodplain and SSSI just north of Sutton station, this is a sensitive and important wildlife corridor.	The applicant acknowledges this comment. Please refer to the Environmental Statement and the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1), which details how potential effects have been mitigated.
RR-039-2	Homes England Agency were problematic early on in the scheme but Historic England waited until right at the end of this process to even assist in getting the road out of the Nene floodplain, but it still leaves the new road very close to the river, potential geophysical issues, little room for NUM routes, and mitigation from light air and noise pollution.	Please refer to Common Response H. Mitigation for Air Quality, Noise and WCH is outline in the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1). The lighting strategy has been developed in liaison with the relevant environmental specialist to minimise light spill on sensitive receptors and habitats.
RR-039-3	Historic England should be challenged as to what is really in the southern edges of this Scheduled Monument. Please get in touch if you require further evidence/explanation.	Please refer to Common Response H.
RR-039-4	Support the new position of eastern junction, only concern is the closing of the old roads that these do not become anti-social problems and need careful consideration on how these are kept secure.	The support for the Scheme is noted. The Applicant is considering mitigation regarding the concerns mentioned and discussion with Peterborough City Council will continue. A meeting was held with the Applicant

Reference	Relevant Representation	Applicant's Response
		and Peterborough Council on the 23 February 2021 to discuss the Scheme proposals and current antisocial behaviors in the vicinity of the works. (The Applicant is looking to develop a Statement of Common Ground with Peterborough City Council (an initial draft of which will be submitted at Deadline 3) where details of these discussions will be included).
RR-039-5	The Upton road would make a good NUM route if it could be linked in to other paths and helps to keep Upton connected with surrounding villages. The lighting to the junction and construction compound should not be allowed to impinge on surrounding environmental sensitive areas. Proper consideration needs to be incorporated into NUM routes for horse riders on the disused rail bed as a safe way of crossing the new A47.	<p>Please refer to Common Response C.</p> <p>With regard to accessibility for cyclists to/from Ailsworth/Castor: The section of Peterborough Road between Ailsworth and the existing Sutton Road roundabout is identified on The Official Peterborough City Cycle Map as an advisory on-road cycle route. This implies that this route is lightly trafficked and the City Council consider that it is a safe route for cyclists. Indeed, the WCH surveys recorded a high number of cyclist movements on Peterborough Road, the majority of which passed through the Sutton Road roundabout travelling north to south (and vice versa) across the A47. The Scheme would have little impact on traffic conditions on the section of Peterborough Road providing access to/from Ailsworth so the status quo for cyclists is maintained. In view of this, there is no requirement to extend the proposed shared use cycle track further to the east towards Ailsworth.</p> <p>The Applicant will investigate use of the proposed underpass by equestrians and will report the findings of these investigations to the Examination at Deadline 2.</p>

Reference	Relevant Representation	Applicant's Response
RR-039-6	The use of the old rail bridge makes great use of this Victorian feature and it is hoped the concrete underpass is sensitively blended into the surroundings. It is also hoped the station house with its pleasing architecture can be retained near to its present location.	<p>Please refer to Common Response G.</p> <p>The railway bridge will be surveyed to level 3 historic building record standards (written, photographic and measured survey), as stated in the Environmental Management Plan under Record of Environmental Actions and Commitments (REAC) commitment CH3 of the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1). This will help inform detailed design.</p>
RR-039-7	The only other area of concern is the western roundabout and access out of Wansford, will this need some form of smart traffic lights in the future? As this will never be really solved until there is a A1 upgrade, also is it not possible to extend the height of the balustrade on the east west bridge over the A1 with anti climb key clamp system. The present A47 is overdue an upgrade on the grounds of safety, especially the Southorpe road junction.	<p>Please refer to Common Response D and A.</p> <p>The current barrier on the east west bridge over the A1 is considered to be sufficient from a safety perspective.</p>
RR-039-8	It is more important than ever we protect the environment and place more emphasis on avoiding doing damage unlike Historic England protecting a burial barrow that does not exist. In conclusion the scheme gets an 8 out of 10 score, and would have been higher if other agencies had shown better engagement.	<p>Please refer to Common Response H.</p>

44 RR-040 SAVILLS (UK) LTD ON BEHALF OF WILLIAM SCOTT ABBOTT TRUST

Reference	Relevant Representation	Applicant's Response
RR-040-1	The design of the approach to Sacrewell Farm (owned by the William Scott Abbott Trust) is of paramount importance. The current design in the Environmental Masterplan (AS-021) is of insufficient detail, the draft Statement of Common Ground is unspecific in how exactly the entrance will be designed and this presents the Charity with the risk of little influence over the detailed design when it commences after the GVD is issued. Poor design could irreparably damage the Charity.	<p>Design is appropriate to the stage / secured through Requirement 3 of the draft Development Consent Order (DCO) (AS-010).</p> <p>Following a meeting with Savills and Sacrewell Farm on 10/12/21 some design principles have been agreed and the Applicant is looking to develop a Statement of Common Ground with Sacrewell Farm, a draft of which will be submitted at Deadline 3.</p>
RR-040-2	The Charity's core demographic is of young families, tourists and those on camping holidays and the entrance via the proposed underpass is the first impression visitors receive of the education and tourist offering beyond. A poorly designed underpass approach, inadequate landscaping and surplus land will facilitate the continuation of the illegal sex trade, drug & alcohol abuse and trespass issues which are prevalent in the area and specifically which emanates from Highways England's freehold site directly opposite the entrance to Sacrewell Farm.	<p>A meeting was held with the Applicant and Peterborough Council on the 23 February 2021 to discuss the Scheme proposals and current antisocial behaviours in the vicinity of the works (The Applicant is looking to develop a Statement of Common Ground with Peterborough City Council (an initial draft of which will be submitted at Deadline 3) where details of these discussions will be included).</p> <p>The Applicant has worked closely with Sacrewell Farm throughout the development of the design for the Scheme.</p> <p>Meetings have been held in regard to the draft Statement of Common Ground and the Applicant will continue to work towards resolving the outstanding points before the close of the Examination.</p>
RR-040-3	Experience from the A14 road scheme (also via DCO) left many claimants with no ability to influence the detailed	The Applicant has worked closely with Sacrewell Farm throughout the development of the design for the Scheme.

Reference	Relevant Representation	Applicant's Response
	<p>design because it was undertaken after the GVD was issued and the control had all passed to Highways England. The fallout from that lack of agreement on detailed design elements continues today, long after the A14 opened. Whilst the A47 have engaged constructively with the preparation of the Statement of Common Ground, the current draft includes warm words of future engagement on the detailed design but is light on specifics. The Charity needs specifics and seeks to highlight this problem to the Planning Inspectorate. The entrance to Sacrewell Farm is vital. The Charity are submitting representations on this element only and are doing so to highlight the proposals that Sacrewell have put forward that will mitigate the impact on their entrance and ensure the Charity continues to be viable.</p>	<p>Meetings have been held in regard to the draft Statement of Common Ground and the Applicant will continue to work towards resolving the outstanding points before the close of the Examination.</p>
RR-040-4	<p>The Charity claim to have spent £30,000 per month in the last six months tackling the anti-social behavior (lewd acts, drug and alcohol abuse) which has been spilling over onto the Charity's land from Highways England's freehold land opposite its entrance. This is not sustainable. There is a significant risk that if the design of the new underpass is not sufficiently thought out then it will facilitate the continuation of these acts. If this should happen, there is scope for a claim by the Charity for loss of earnings if this behaviour should continue. The Charity request the use of fencing, lighting, CCTV, high gates and stone wing walls, double yellow lines and landscaping proposals which are designed to make the entrance to Sacrewell as attractive as possible to its customers whilst deterring loitering and barring access to the underpass for the extant anti-social</p>	<p>The Applicant has and will continue to look to take all reasonable and practical steps to mitigate antisocial behaviour in vicinity of the new Sacrewell Farm entrance.</p> <p>The Applicant engaged with the 'Designing Out Crime' team from the Cambridgeshire Constabulary on 5 November 2021. The Applicant discussed anti-social behaviour and the current proposals for the Scheme. During this meeting, the Applicant was advised that there have been no reports of antisocial behaviour in the area. When reviewing the design, the Applicant was advised that they were doing more than would be expected by providing a gated entrance. The Applicant was also advised to ensure that the fencing and gating is a minimum of 1.8m high and to look into providing lighting at the</p>

Reference	Relevant Representation	Applicant's Response
	behaviour. The Charity requests that Highways England are instructed to bring forward the designs of this entrance as a matter of urgency, and no later than 31/12/21, and to fully accommodate the Charity's wishes in the design process.	<p>entrance. This will be reviewed during the detailed design of the Scheme.</p> <p>Following on from the meeting with Cambridgeshire Constabulary, the Applicant has advised Sacrewell Farm to report all instances of anti-social behaviour to the police.</p>

45 RR-041 STEVE WOODS

Reference	Relevant Representation	Applicant's Response
RR-041-1	My main concern is that we will be unable to exit the village of Wansford at the Roundabout at the top of Old North Road This is already incredibly difficult to exit without the prioress duelling. All the current scheme appears to provide is a further bottleneck at this small roundabout where two of the regions largest roads intersect (A1/A47) Surely the whole scheme should incorporate a review of the impact to the Wansford roundabout which is not built to cope with the volume of traffic Ideally the A1/A47 junction should be reviewed as one	Please refer to Common Response D.

46 RR-042 STRUTT & PARKER ON BEHALF OF RIVERFORD ORGANIC FARMERS LTD

Reference	Relevant Representation	Applicant's Response
RR-042-1	The access off the A1 to Sacrewell Lodge (OS Ref: 52.594551, -0.418874 near "Processors and Growers") is used by large commercial vehicles. It is advised that the deceleration and acceleration lanes off/onto the A1 should be improved in the interests of road safety. The proposed underpass of the A47 must be of sufficient size for current and future agricultural use.	<p>Improvement of this existing access on the A1 is not within the scope of this Scheme. The relatively small increase in traffic using this junction as a result of the alternative access to the Great North Road houses is not considered to significantly change any existing safety implications associated with this access.</p> <p>The proposed new underpass (Structure S05) will provide a minimum headroom clearance of 5.3m which is considered suitable for agricultural use (see page 19 2.5 Engineering Drawings and Sections (APP-008) (Engineering Drawings Regulations 5(2)(o) & 6(2)(a) Structures Drawings Structure S05, CH.0+298 - Regulations 5(2)(o) & 6(2)(a)).</p>

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47 RR-043 SUTTON PARISH COUNCIL

Reference	Relevant Representation	Applicant's Response
RR-043-1	Sutton Parish Council supports the proposals submitted to Planning inspector by Highways England with the following comments and provisos.	This response has been noted.
RR-043-2	The initial predetermination of the route alignment by the original Highways England project team and its project sponsors was done without proper consultation, using only preliminary reports on geology, environment, and construction risks was simply wrong. It meant a preferred route was chosen which was totally rejected in the pre and Statutory Public Consultation stage. Highways England reacted by appointing a new project team who have responded positively to the majority of the community concerns however, time wasted by the original project team trying to justify their predetermined route wasted a considerable amount of public time and funds.	<p>This response is noted.</p> <p>A non-statutory consultation on route options took place between 13 March 2017 and the 21 April 2017.</p> <p>The options consultation was undertaken in the same manner as the statutory consultation carried out later, in that the Applicant sought the views of various interested parties and stakeholders, as well as gauging public opinion regarding the selection of the preferred option. The Applicant actively sought to discuss the proposals with parties directly affected by the proposals, such as landowners and those with business interests or development proposals in the Scheme area. The Applicant wrote directly to identified consultees, held a series of targeted and public consultation events, and made information available publicly in the vicinity of the Scheme and online. Information, including the consultation brochure and feedback response form, was made available at locations in the vicinity of the Scheme and on the Scheme consultation website. In August 2017 following the options consultation, the Applicant announced its preferred route for the Scheme. See the Consultation Report (AS-011) and Annex A of the Consultation Report (APP-024) for the Preferred Route Announcement (PRA).</p>

Reference	Relevant Representation	Applicant's Response
		During the development of any scheme the information that is used is appropriate to the stage in the design process. The use of preliminary reports at the Scheme option stage is therefore appropriate.
RR-043-3	Highways England failed to properly engage with Historic England who in turn failed to follow its own guidelines to allow investigation over part of the historic monument site causing an inferior initial route alignment close to the river and in a County Wildlife site. Historic England should be censured for wasting public time and money. If not for the intervention of local Parish Councils and an impacted local land owner the route would have had more construction risks and cost. Local interest forcing Historic and Highways England together has created a much more satisfactory alignment and saved an estimated £5-7million.	<p>Please refer to Common Response H.</p> <p>The cost estimates provided in the representation cannot be verified by the Applicant.</p>
RR-043-4	<p>Despite our support for the proposals we still believe Highways England will fall short of their core objectives with outstanding connectivity issues to be resolved:</p> <ul style="list-style-type: none"> Providing safe accessibility, for Upton residents along The Drift and Langley Bush road to the new roundabout. 	Please refer to Common Response F.
RR-043-5	<ul style="list-style-type: none"> Accessibility for a WCHR route from Upton to Sutton and Castor/Ailsworth. We have put forward proposals and simple affordable solutions which would maintain our close historic connectivity. 	<p>Please refer to Common Response C.</p> <p>With regard to accessibility for cyclists to/from Ailsworth/Castor. The section of Peterborough Road between Ailsworth and the existing Sutton Road roundabout is identified on The Official</p>

Reference	Relevant Representation	Applicant's Response
		Peterborough City Cycle Map as an advisory on-road cycle route. This implies that this route is lightly trafficked and the City Council consider that it is a safe route for cyclists. Indeed, the Walking, Cycling and Horse Riding (WCH) surveys recorded a high number of cyclist movements on Peterborough Road, the majority of which passed through the Sutton Road roundabout travelling north to south (and vice versa) across the A47. The Scheme would have little impact on traffic conditions on the section of Peterborough Road providing access to/from Ailsworth so the status quo for cyclists is maintained. In view of this, there is no requirement to extend the proposed shared use cycle track further to the east towards Ailsworth.
RR-043-6	<ul style="list-style-type: none"> Highways England proposals provide major WCHR route improvements east to west however, final connectivity either crossing or going under the A1 to Wansford remains very unsatisfactory for most users. We have put forward solutions which to date have been rejected. 	Please refer to Common Response A.
RR-043-7	<ul style="list-style-type: none"> The initial failure to recognise the impact and not including any major improvements to the west roundabout at Wansford within the project objectives gives major concern for the whole community. The inevitable west bound queues at the roundabout will create tailbacks to and beyond the east roundabout and negatively impact free flow of traffic. 	Please refer to Common Response D.
RR-043-8	<ul style="list-style-type: none"> With the anticipated increase in traffic volumes, 	Please refer to Common Response D.

A47 Wansford to Sutton Dualling

Applicant's Response to Relevant Representations

Reference	Relevant Representation	Applicant's Response
	safe access from Wansford onto the west roundabout is, as it is now, going to become an increasingly dangerous manoeuvre.	
RR-043-9	<ul style="list-style-type: none">We fully support the need to dual this very dangerous section of road and understand Road Safety Assessments will be a continuing feature of this project and hope any shortcomings will be followed by the appropriate action.	This response has been noted.

48 RR-044 THE CAMPBELL HOUSEHOLD

Reference	Relevant Representation	Applicant's Response
RR-044-1	<p>From its junction with the A1 at Wansford, the A47 eastwards to the Sutton (Nene Way) Roundabout is a dangerous and congested road. Unrealised plans for it to be improved date back to at least the 1970s. The announcement in early 2017 that plans were afoot to raise the A47 to dual carriageway standard was therefore welcome to us as local residents. However, the Preferred Route chosen by the Applicant later that year took an alignment to the south of the existing A47 despite a public consultation where this was the least popular of 3 options. In contrast, the most popular option, and favoured by us, was for an alignment to the north of the existing A47. This was because the Preferred Route entailed severe adverse impacts on the natural environment and local residents. After considerable work by local residents and organisations over a long period, the dualling scheme now presented here by the Applicant marks a considerable improvement over the Preferred Route. In particular, the proposed more northerly alignment of the new road in relation to the village of Sutton is welcome. We therefore broadly support this scheme but with certain caveats:</p>	This response is noted.
RR-044-2	<p>The section of the proposed new road due west of the Sutton Heath Road still impinges on the Nene Valley. Concerns remain about the effects of this on drainage (flooding), wildlife, and the stability of the new road itself (the existing A47 is prone to slippage). The proposed route here is apparently governed by the site of a Scheduled</p>	<p>Please refer to Common Response B.</p> <p>Any impact to the active floodplain from encroachment of the Scheme footprint is mitigated within the design through the addition of flood compensation areas (see Environmental Statement (ES) Chapter 13 (AS-017) section 3.9 and Table</p>

Reference	Relevant Representation	Applicant's Response
	Monument. The simple way around this issue would be to excavate the Monument, which would allow a more northerly alignment away from the River Nene.	<p>3.7). This replaces any loss of volume like for like and ensures there is no detriment to the floodplain. This is a requirement of the Environment Agency.</p> <p>ES Chapter 8 Biodiversity (AS-015) sets out the effects and mitigation on ecological receptors.</p> <p>Please refer to Common response H regarding the Scheduled Monument.</p>
RR-044-3	The situation with the dumbbell roundabout layout at Wansford remains unsatisfactory. In particular, little or nothing is to change at the westernmost roundabout. Even now this roundabout is heavily congested. The turn out of Wansford (i.e. the southern exit of the roundabout) is particularly difficult and hazardous. The roundabout needs to be considerably expanded or a new arrangement devised. Failure to do this will undermine the scheme's objectives by creating a major unsafe bottleneck.	Please refer to Common Response D.
RR-044-4	The scheme's 4 objectives are set out in para. 2.2.1 on page 3 of the Applicant's document "Volume 1: 1.3 Introduction to the Application." These objectives originally appeared in the Applicant's "Public Consultation" and "Preferred Route Announcement" documents in March and August 2017, respectively. However, both these documents listed 2 other objectives: improved environment and value for money. Why have these objectives been dropped; both are of vital importance. In the environmental context, we would wish to see the maximum amount of mitigation in terms of the new road's impact on Sutton, the Nene Valley, and generally; and the maximum provision for pedestrians,	<p>Please refer to Common Response A.</p> <p>The Scheme still satisfies the environment and value for money objectives mentioned. As set out in paragraph 4.3 of the Case for Scheme, The Highways England Licence (2015) sets out key requirements which must be complied with by the Licence holder, as well as statutory guidance. In exercising its functions and complying with its legal duties and obligations, the Licence holder must act in such a manner which it considers best calculated, including to (amongst others):</p> <p><i>'ensure efficiency and value for money' and</i></p>

Reference	Relevant Representation	Applicant's Response
	equestrians, and cyclists.	<p><i>'ensure that protecting and enhancing the environment is embedded into its business decision-making processes and is considered at all levels of operations'.</i></p> <p>These considerations therefore apply across all National Highways activities.</p>
RR-044-5	In conclusion, we support the dualling scheme in principle, but room for improvements remain as outlined above.	The Applicant notes the support for the Scheme.

49 RR-045 THE WOODLAND TRUST

Reference	Relevant Representation	Applicant's Response
RR-045-1	<p>Trees</p> <p>The Woodland Trust welcomes the opportunity to register a representation to the following project.</p> <p>We hold significant concerns with regards to the removal of T20, a veteran oak tree outlined within the applicant's Arboricultural Impact Assessment (AIA) Report [APP-096]. The Trust asks that all trees displaying veteran characteristics are retained, and adequately protected during construction in line with Natural England's Standing Advice which states: "A buffer zone around an ancient or veteran tree should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5m from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter." In summary, the Woodland Trust objects to the proposed development on the grounds of direct loss of a veteran tree. We hope our comments are of use to you.</p>	<p>The Applicant confirms that T20 will be removed and as the Scheme is a nationally significant project, the removal of this tree is in accordance with National Planning Policy Framework (NPPF). The NPPF states the following in Section 180:</p> <p><i>"development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons (63) and a suitable compensation strategy exists</i></p> <p><i>(63) For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat".</i></p> <p>The planting proposals, as shown in the Environmental Masterplan (AS-021) aim to mitigate the loss trees as far as is practicable.</p>

50 RR-046 TREVOR MCSPARRON

Reference	Relevant Representation	Applicant's Response
RR-046-1	<p>There needs to be a safe route over or under the A1. I cannot see how a multi hundreds of a million pound scheme cannot provide such a basic need for local residents. There needs to be local benefits to a large regional scheme. The ramp is a nightmare if you have children, I have seen someone try and take a wheel chair down and give up. Going over the A1 is pretty much as dangerous as you can get. Given that Sacrewell Farm is a stones throw away it's a joke that local residents cannot access it on their cycles or walking without being faced with a ski slope under the A1!</p>	<p>Please refer to Common Response A.</p>

51 RR-047 UK HEALTH SECURITY AGENCY

Reference	Relevant Representation	Applicant's Response
RR-047-1	Thank you for your consultation regarding the above development. UK Health Security Agency (UKHSA) (formerly Public Health England) welcomes the opportunity to comment on your proposals at this stage of the project. UKHSA notes that we have replied to earlier consultations as listed below and this response should be read in conjunction with that earlier correspondence: Scheme update and Supplementary Consultations 18 November 2020	This response has been noted.
RR-047-2	We can confirm that we have assessed the submitted documentation and wish to make the following recommendations. Overall, better characterisation and assessment of impacts on human health from air quality from the construction and operational phases is required in the Environmental Statement (ES) and in the Population and Human Health chapter for the general population and vulnerable groups, in light of existing health statuses.	<p>The health assessment as presented in ES Chapter 12 Population and Human Health (AS-016) follows guidance LA112 which states that information gathered for other environmental factors, such as air quality should be used to help identify change to health determinants. Table 12-18 in Chapter 12 (AS-016) concludes Neutral residual effects on human health in terms of air quality and summarises the reasons behind this. The details are presented in Environmental Statement (ES) Chapter 5 Air Quality (APP-043).</p> <p>The air quality assessment predicted concentrations at all human health receptors to be below the Air Quality Strategy objective (AQO) of 40 µg/m³. Overall, 14 of the 22 receptors are expected to show a deterioration in air quality, with 7 showing an improvement in air quality with the Scheme in place. 1 receptor is predicted to experience no change in air quality. All predicted air quality concentrations are below the AQO. The air quality assessment has concluded there would be no significant effects on air quality at human receptors as a result of the Scheme.</p>

Reference	Relevant Representation	Applicant's Response
RR-047-3	There appears to be a number of gaps in the submitted documentation, relating to ground investigation information, the environmental management plan and limited information regarding impacts from any decommissioning.	<p>The Applicant is not aware of anything missing from the submitted documentation.</p> <p>Requirement 4 to the Draft Development Consent Order (DCO) (AS-010), 'Environmental Management Plan', sets out:</p> <p>(1) No part of the authorised development is to commence until an Environmental Management Plan (EMP) (Second Iteration) for that part, substantially in accordance with the EMP (TR010039/APP/7.5 Rev 1) (First Iteration) has been submitted to and approved in writing by the Secretary of State, following consultation by the undertaker with the relevant planning authority and local highway authority to the extent that the content of the EMP (TR010039/APP/7.5 Rev 1) (Second Iteration) relates to matters relevant to their functions.</p> <p>(2) The EMP (TR010039/APP/7.5 Rev 1) (Second Iteration) for any part of the authorised development must be written in accordance with ISO14001 and so far as is relevant to that part of the authorised development, must reflect the mitigation measures required by the Record of Environmental Actions and Commitments (REAC) with the EMP (TR010039/APP/7.5 Rev 1) and set out in the Environmental Statement (ES) (and must include as many of the following plans and strategies as are applicable to the part of the authorised development to which it relates—</p> <ul style="list-style-type: none"> (a) Site waste management plan (b) Materials management plan; (c) Soil management plan, which includes: <ul style="list-style-type: none"> (i) a soil resource plan;

Reference	Relevant Representation	Applicant's Response
		<p>(ii) a soil handling strategy; (d) Construction noise and dust management plan; (e) Construction communication strategy; (f) Landscape and ecology management plan; (g) Biosecurity management plan; (h) Water monitoring and management plan; (i) Detailed heritage written statement of investigation (mitigation strategy); (j) INNS management plan; and (k) Operational UXO emergency response plan.</p> <p>The EMP (TR010039/APP/7.5 Rev 1) will be updated by the Principal Contractor as the Second Iteration.</p>
RR-047-4	<p>Air Quality</p> <ul style="list-style-type: none"> The air quality assessment only considers long-term impacts through changes in annual means. It is recommended that short-term impacts on air quality are considered for both construction and operational activities for all potential pollutants (PM₁₀, PM_{2.5} and Nox), as there are no safe limits of exposure in relation to health risk. 	<ul style="list-style-type: none"> In accordance with LA105 guidance, the short-term impacts should only be modelled should there be an exceedance of the air quality objectives. As all modelled concentrations for the long-term impact were well below the air quality objectives for both NO₂ and PM₁₀ there was no requirement to model the short-term impacts nor was there any risk of exceedance of the short-term objectives. Environmental Statement (ES) Chapter 5 Air Quality paragraph 5.4.10 (APP-043) states that in accordance with LA 105 there is no need to model PM_{2.5} as the UK currently meets its legal requirements for the achievement of the PM_{2.5} air quality annual mean objective. PM₁₀ has been used to demonstrate that the project does not impact on the PM_{2.5} air quality objectives.

Reference	Relevant Representation	Applicant's Response
	<ul style="list-style-type: none"> Reducing public exposures to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards has potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure), and maximise co-benefits (such as physical exercise) and encourage their consideration during development design, environmental and health impact assessment, and development consent. Clarity and justifications are required regarding the choice of study area and the zone of influence for the air quality assessment of the construction and operational phases; and the choice of community wards as detailed in Chapter 12, which is noted to not include Wansford village area. Better consistency is required in the description of receptor selection when comparing section 5.4.3 and 5.4.23 of Chapter 5. We recommended that the assessment of receptors include those within 25m of a junction. 	<ul style="list-style-type: none"> This response has been noted. Section 5.6.5 onwards within the ES Chapter 5: Air Quality (APP-043) detail the choice of study area, describing in detail the traffic screening method, determining "triggered links" and the Affected Road Network (ARN). Wansford village falls within Wittering ward as shown on ES Figure 12.1 (APP-078), which is included in the health assessment presented in ES Chapter 12 Population and Human Health (AS-016). Sensitive receptors selection has been described in point 2 above. The text in section 5.4.23 of ES Chapter 5 Air Quality (APP-043) describes the Air Quality Directive's

Reference	Relevant Representation	Applicant's Response
	<ul style="list-style-type: none"> Further details are recommended regarding impacts on walking, cycling and horse riding users, including those because of increased route journey times from the design/changes. Further clarifications and justifications as to why receptors have not been included in Figures 5.4A, C and E Construction Phase Limited details have been provided regarding overall air emissions that would be expected from the construction phase, including the presence of any non-road mobile machinery and cumulative impacts from these. It is recommended that further details are provided, including those regarding monitoring and worst-case assessments. Consideration should be given within the air quality assessment to the impact of any proposed road closures, traffic management, or further restrictions that may be encountered during the construction 	<p>definition, not our assessment method.</p> <ul style="list-style-type: none"> The assessment of walking, cycling and horse riding would come under short term exposure. This has been discussed above and concluded that there is no risk to exceedance of the short term air quality objectives. ES Figure 5.1 -Sensitive Receptors within a Distance of Construction Activities (APP-056) details sensitive receptor locations during the construction phase. In accordance with Design Manual for Roads and Bridges (DMRB) LA105 for the construction phase risk assessment all sensitive are identified within buffer zones at the following distances from the red line boundary. 0-50m, 50-100m and 100-200m of the Scheme red line boundary. This is considered conservative as assume the whole area within the red line boundary will be a construction activity emitting dust. Where construction activities are scheduled to last less than two years DMRB LA105 screens out the need for the assessment of road traffic emissions associated with the construction phase. The EMP (TR010039/APP/7.5 Rev 1) provides additional information on how emissions will be controlled during the construction phase.

Reference	Relevant Representation	Applicant's Response
	<p>phase, both on the roads to be developed as part of the scheme and roads in the surrounding area, including the Affected Road Networks.</p> <ul style="list-style-type: none"> It is unclear why construction impacts have been screened out based on the construction phases lasting less than two years; potential air quality impacts on human health from this phase are acknowledged in Chapter 12 (section 12.8.7). Further clarifications are required as to why residential properties have not been identified within 200m of the works at Upton Drift (see Figure 5.1). <p>Operational Phase</p> <ul style="list-style-type: none"> It is recommended that short term and long-term modelling be undertaken for PM10 and PM2.5 for the Do-minimum and Do-something scenarios to define areas of deterioration of air quality where further mitigation could be required. PM10 concentrations have been used to demonstrate the Proposed Scheme does not impact on the PM2.5 air quality objectives. Where scoping out is recommended by the applicant, the public health impact assessment should be supported with reliable data, including modelling and predictions. 	<ul style="list-style-type: none"> See response above See response above The air quality assessment as detailed in ES Chapter 5 Air Quality (APP-043) did include the residential receptors within 200m of Upton Drift. The residential properties have however been missed from ES Figure 5.1 (APP-056) and this will be amended and submitted at Deadline 2. For the operational phase the selection of human health receptor locations are detailed on ES Figures 5.4 A-F (APP-057). See response above for description of sensitive receptors

Reference	Relevant Representation	Applicant's Response
	<ul style="list-style-type: none"> There are several areas where clearer justifications are required: <p>The choice of opening year (2025) for worst-case assessment.</p> <p>It has not been demonstrated that this is the worst-case year when compared to other years, for example during the construction phase where there is the potential for several cumulative impacts. It is unclear why no reference has been made to the design year (2040), when this is included in the transport assessment. O Whether the choice of locations for the scheme specific monitoring is representative of worst-case scenario for sensitive receptors (for example, considering weather conditions). O The location of colocation sites 1-3 relative to the scheme monitoring, how findings (which show close to or an exceedance in AQS) inform the risk assessment. • The modelling for NO2 showed that 14 of the 22 receptors are expected to show a deterioration in air quality, which is of concern. O It is noted that for each triggered road link only one receptor representing the closest receptor was chosen, which may preclude the identification of a greater number of receptors with a deterioration in air quality. Section 12.7.1 advises that there are approximately 370 properties within the study area. It is recommended that details of results for individual receptors be included. O It is recommended that further details are provided regarding additional mitigation measures to be incorporated into</p>	<ul style="list-style-type: none"> Please refer to earlier response DMRB LA105 provides a consistent method of assessment across all schemes. PM10 concentrations are significantly below the Air Quality Strategy objective (AQO) which following DMRB LA105 then screens the need for further assessment. This is fully detailed in Para 5.8.6 of the ES Chapter 5 Air quality (APP-043). As part of the traffic modelling assessment an opening forecast year of 2025 has been adopted for all A47 Road Investment Strategy (RIS) schemes (Wansford to Sutton, North Tuddenham to Easton, Thickthorn Junction and Blofield to North Burlingham). Based on Highways England Delivery Plan 2019-2020 the estimated completion of construction for Wansford is 2024/25. Road transport emissions will reduce with time as the fleet becomes more electrified. Therefore, assessing the opening year will provide a worst case assessment. While there may be some growth in traffic between 2025 and 2040 the fleet by then will be made up of a significant t percentage of non fossil fueled engines. Scheme specific monitoring was undertaken to provide

Reference	Relevant Representation	Applicant's Response
	<p>the development to prevent this deterioration. This deterioration and the corresponding health impacts should also be acknowledged and assessed in Chapter 12 (Population and Human Health) for the general population and vulnerable groups, i.e. the impacts on respiratory diseases, hospital admissions and other chosen health indicators. Justification for the methodology should be provided and where necessary, monitoring should be recommended.</p>	<p>additional information on the baseline air quality and to support model verification. The purpose of the site-specific monitoring was not to quantify the highest concentrations. The locations of the monitoring locations followed LAQM TG16, which provides best practice guidance on monitoring.</p> <ul style="list-style-type: none"> • The purpose of the colocation tubes is to provide Quality Assurance and Quality Control for the discussion tube study. These provide bias correction information and follows best practice IAQM guidance- https://laqm.defra.gov.uk/documents/0802141004_NO2_WG_PracticalGuidance_Issue1a.pdf. . • Paragraph 2.21.1 in LA105 states the following regarding receptor selection: <i>"There should be no need to model all receptors within 200m, or an excessive number of receptors in the same area, to determine whether there is likely to be any exceedances in the do minimum or do something scenarios".</i> <p>It was therefore considered best practice to select the closest receptor on each triggered link as this would represent the worst-case scenario and provide the maximum impact on each link as a result of the proposed Scheme.</p> <p>ES Chapter 12 Population and Human Health (AS-016) includes the findings of the Air quality assessment in terms of effects on human health.</p>

Reference	Relevant Representation	Applicant's Response
RR-047-5	<p>Water, Geology and Soils</p> <ul style="list-style-type: none"> The Ground Investigation Report (Sweco 2020) does not appear to have been submitted with this application. This is referenced as being in Appendix 9.4, however, this relates to a Construction workers risk assessment only. Limited details regarding source, sampling, ground gas monitoring locations and results findings have been included in Chapter 9, making it difficult to undertake a public health risk assessment. Better consistency is required between Chapter 9 and Chapter 13 with regards to the location of groundwater and surface water abstractions and their number. The assessment regarding public health impacts should be updated, where necessary. Further clarifications and better consistency are required regarding the significance assessment for construction impacts for off-site receptors. Table 9-12 identifies a slight adverse impact; however, it is also stated that 'no risks have been identified to Human Health from soils or ground gas on the 	<ul style="list-style-type: none"> This was an error. The Ground Investigation Report (GIR) has been submitted at Deadline 1 (TR010039/EXAM/9.2). As detailed in Section 9.4.18, a quantitative risk assessment was undertaken within the GIR. Full details of sources, sampling, ground gas monitoring and results are included in the GIR. Environmental Statement (ES) Chapter 9 (TR010039/APP/6.1 Rev 1) (9.7.26 – 9.7.45) provides a summary of the findings of the risk assessment presented within the GIR. The Ground Investigation Report has been submitted at Deadline 1 (TR010039/EXAM/9.2). The reference to Appendix 9.4 in ES Chapter 9 Geology and Soils (TR010039/APP/6.1 Rev 1) is incorrect. This has been updated. The Applicant acknowledges your comments regarding the locations of groundwater and surface water abstractions. This discrepancy does not have an impact on the risk assessment undertaken. ES Chapter 9 (TR010039/APP/6.1 Rev 1) has been updated to rectify this. The Applicant acknowledges your comment regarding consistency of details within Table 9-12. The statement should read "no significant risks have been identified". Slight adverse impacts have been detailed due to the high sensitivity of the receptor but these are not considered to represent significant risk to human health.

Reference	Relevant Representation	Applicant's Response
	<p>Proposed Scheme'. In addition, mitigation measures described in Table 9-12 are for dust; whilst section 9.10.3 identifies residual effects to human health from the disturbance and mobilization of contamination in geology and soils.</p> <ul style="list-style-type: none"> Electric and Magnetic Fields The current documentation makes no reference to EMF emissions from the development. We recommend that the proposer: <ol style="list-style-type: none"> Identify if the proposed development has electricity generation and/or distribution infrastructure that may result in the emission of electric and/or magnetic fields such that there is the potential for an adverse impact on public health. Where electricity generation and/or distribution equipment is identified an assessment of potential EMF exposures should be included; Should the proposer believe that EMF can be scoped out of the assessments they should clearly state their assumptions and rationale in the application for DCO submission. 	<p>Mitigation measures required are detailed in the Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 1) to reduce potential for impact risks during construction.</p> <ul style="list-style-type: none"> The Scheme design does not include electricity generation or distribution infrastructure and therefore EMF is not included in the environmental assessment.

52 RR-048 UPTON COMMUNITY COUNCIL

Reference	Relevant Representation	Applicant's Response
RR-048-1	Poor consultation on plans to suddenly close access to Upton Rd. - No consideration for the additional traffic which will be travelling through the village. - Residents views and concerns not being listened to.	Please refer to Common Responses E and F.
RR-048-2	- Ignored safety concerns about the route Upton Residents will have to follow to get to the A47 - Upton being ignored because of its size.	Please refer to Common Responses E and F.

A47 Wansford to Sutton Dualling

Applicant's Response to Relevant Representations

53 RR-049 VIVIEN THORLEY

Reference	Relevant Representation	Applicant's Response
RR-049-1	The lack of inclusion by Galliford Try of improvements to the Western roundabout at Wansford which will completely negate the benefits of dualling due to the dual carriageway ending with a single vehicle pinch point at the roundabout	Please refer to Common Response D.

54 RR-050 WANSFORD PARISH COUNCIL

Reference	Relevant Representation	Applicant's Response
RR-050-1	Wansford Parish Council (WPC) supports the concept of dualling the A47 between Wansford and Sutton as the present road suffers from delays, lacks resilience and has a significant accident rate. There are however considerable problems with the scheme as proposed by Highways England (National Highways (NH)).	This response has been noted.
RR-050-2	At the very first presentation in December 2016, NH indicated that the Wansford western roundabout would not be included in the scheme. WPC pointed out that this compromised the whole scheme as traffic joining the A1 northbound at this roundabout already suffered delays in the evening peak. NH agreed to look at this and later showed schemes with changes to the roundabout, but these were based on incorrect traffic modelling. WPC suggested replacing the roundabout with intelligent traffic lights to address the imbalance of flows at different times of day. NH modelled fixed period traffic lights and stated that it made no difference to the capacity. They did not model the solution suggested by WPC. The modelling did show the roundabout causing severe delays later in the design period and this will reduce the journey time gains from the rest of the scheme.	<p>Please refer to Common Response D.</p> <p>Although other signal optimisation methods (such as MOVA) could improve the operation of the junction slightly, it will not resolve the peak hour congestion issues at this junction.</p>
RR-050-3	Exiting Old North Road both north and south of the A47 will become increasingly dangerous as traffic increases.	Please refer to Common Response D.
RR-050-4	At the beginning of the programme, AECOM suggested a	This comment relates to a feasibility study produced by

Reference	Relevant Representation	Applicant's Response
	solution to these problems but that option was not progressed by NH.	AECOM for the 2011-2015 A47-A12 Feasibility study. In the years following the production of that feasibility study, National Highways has considered extensive alternatives and options. It has determined that the Scheme is the most appropriate solution for the issues faced in this area for the reasons set out in the Case for the Scheme (AS-022).
RR-050-5	NH have stated that the A47 bridge over the A1 is in poor condition and cannot be changed in any way, even returning it to its original configuration. They have failed to produce any evidence of this. By not improving the whole A1/A47 junction NH have effectively abandoned the Wansford community and breached all 4 of their key objectives for the scheme.	<p>The original bridge structure (1963) consisted of non-structural light wells at the central reserve and substandard parapets. In 2001 during refurbishment works the light wells were concreted over and additional safety fences were installed approximately 1m in front of the parapets on both sides of the bridge. The original parapets remain non-compliant as edge protection for cyclists. An inspection of the structure in 2016 reported that the bridge was in good condition.</p> <p>Consideration was given to the opening of two lanes westbound between the Wansford eastern and western roundabouts (understood to be the original configuration). However, a safety review undertaken did identify that two free flow lanes on the approach to the western roundabout increased the risk of collisions at the western roundabout.</p> <p>The Case for the Scheme (AS-022) explains how the key objectives for the scheme have been met.</p>
RR-050-6	In 2017, NH consulted on 3 alignments. The northern one received most support but was discarded by NH. Their report does not make this clear. This route went through the Scheduled Monument (SM) at Sacrewell Farm but it was almost completely off the existing alignment so that traffic management would be minimised and the existing	<p>In 2017 non-statutory consultation took place on 3 alignments.</p> <p>The options consultation was undertaken in the same manner as the statutory consultation carried out later, in that the Applicant sought the views of various interested parties and stakeholders, as well as gauging public opinion regarding the</p>

Reference	Relevant Representation	Applicant's Response
	<p>road provides a good non-motorized traffic route. It also takes the road away from the river escarpment which has a proven history of instability with its associated significant geotechnical risk. This route also avoids damage to the County Wildlife Site along the Nene. NH have estimated the cost of avoiding the SM at between £6 and £11 million. Historic England (HE) carried out a review of the SM but, when asked what analysis HE had done, the Regional Director stated they had done none and relied instead on the analysis by WPC. The northern section of the SM should clearly be preserved but there is a route through the southern section that does not disturb any identified features. East of the SM, the revised alignment is good subject to resolving issues at Upton. WPC has considerably more detail on these and other issues.</p>	<p>selection of the preferred option. The Applicant actively sought to discuss the proposals with parties directly affected, such as landowners and those with business interests or development proposals in the scheme area.</p> <p>The Applicant wrote directly to identified consultees, held a series of targeted and public consultation events, and made information available publicly in the vicinity of the scheme and online. Information, including the consultation brochure and feedback response form, was made available at locations in the vicinity of the Scheme and on the Scheme consultation website.</p> <p>Although the northern alignment option had the lowest cost and was favoured most by the public, it was discounted because it severed the designated scheduled monument (No. 1006796). It was considered that Historic England would object to a route that severed the scheduled monument as there had been 2 other viable options proposed that would avoid it.</p> <p>In August 2017 following the options consultation, the Applicant announced its preferred route for the Scheme, see the Consultation Report (AS-011) and Annex A of the Consultation Report (APP-024) for the Preferred Route Announcement (PRA).</p> <p>At the 2018 Statutory Consultation the alignment was shown shifted as north as possible (whilst still remaining south of the existing A47). In order to achieve this alignment shift the then proposed Nene Way Nene Roundabout was moved east (to its location within the Scheme), with the link to Upton Main Road</p>

Reference	Relevant Representation	Applicant's Response
		<p>maintained.</p> <p>Following feedback from the 2018 Statutory Consultation, the alignment at the east of the Scheme was moved north of the existing A47 (see the Scheme Design Report (AS-026)).</p> <p>Following further discussions with Historic England the alignment now proposed passes through the southeast corner of the Scheduled Monument. In June 2021 Historic England confirmed by letter the agreement to encroachment into the southeast corner of the Scheduled Monument. Please refer to Common Response H for more details about the engagement with Historic England.</p>

55 ADDITIONAL SUBMISSION - AS-043 ENVIRONMENT AGENCY

Reference	Relevant Representation	Applicant's Response
EA Comment AS-043-1	<p>1.0 The Environment Agency's Role</p> <p>1.1 The Environment Agency is an executive non departmental public body, established under the Environment Act 1995.</p> <p>1.2 We were established to bring together responsibilities for protecting and improving the environment and to contribute to sustainable development. We take an integrated approach in which we consider all elements of the environment when we plan and carry out our work. This allows us to advise on the best environmental options and solutions, taking into account the different impacts on water, land, air, resources and energy.</p> <p>1.3 We help prevent hundreds of millions of pounds worth of damage from flooding. Our work helps to support a greener economy through protecting and improving the natural environment for beneficial uses, working with businesses to reduce waste and save money, and helping to ensure that the UK economy is ready to cope with climate change. We will facilitate, as appropriate, the development of low carbon sources of energy ensuring people and the environment are properly protected.</p> <p>1.4 We have three main roles:</p> <ul style="list-style-type: none"> We are an environmental regulator – we take a risk-based approach and target our effort to maintain and improve environmental standards and to 	The Applicant has noted these comments.

Reference	Relevant Representation	Applicant's Response
	<p>minimise unnecessary burdens on businesses. We issue a range of permits and consents.</p> <ul style="list-style-type: none"> We are an environmental operator – we are a national organisation that operates locally. We work with people and communities across England to protect and improve the environment in an integrated way. We provide a vital incident response capability. We are an environmental adviser – we compile and assess the best available evidence and use this to report on the state of the environment. We use our own monitoring information and that of others to inform this activity. We provide technical information and advice to national and local governments to support their roles in policy and decision-making. <p>1.5 The Environment Agency takes action to conserve and secure proper use of water resources, preserve and improve the quality of rivers, estuaries and coastal waters and groundwaters through pollution control powers and regulating discharge permits.</p> <p>1.6 We have regulatory powers in respect of waste management and remediation of contaminated land designated as special sites. We also encourage remediation of land contamination through the planning process.</p> <p>1.7 The Environment Agency is the principal flood risk management operating authority. It has the power (but not the legal obligation) to manage flood risk from designated</p>	

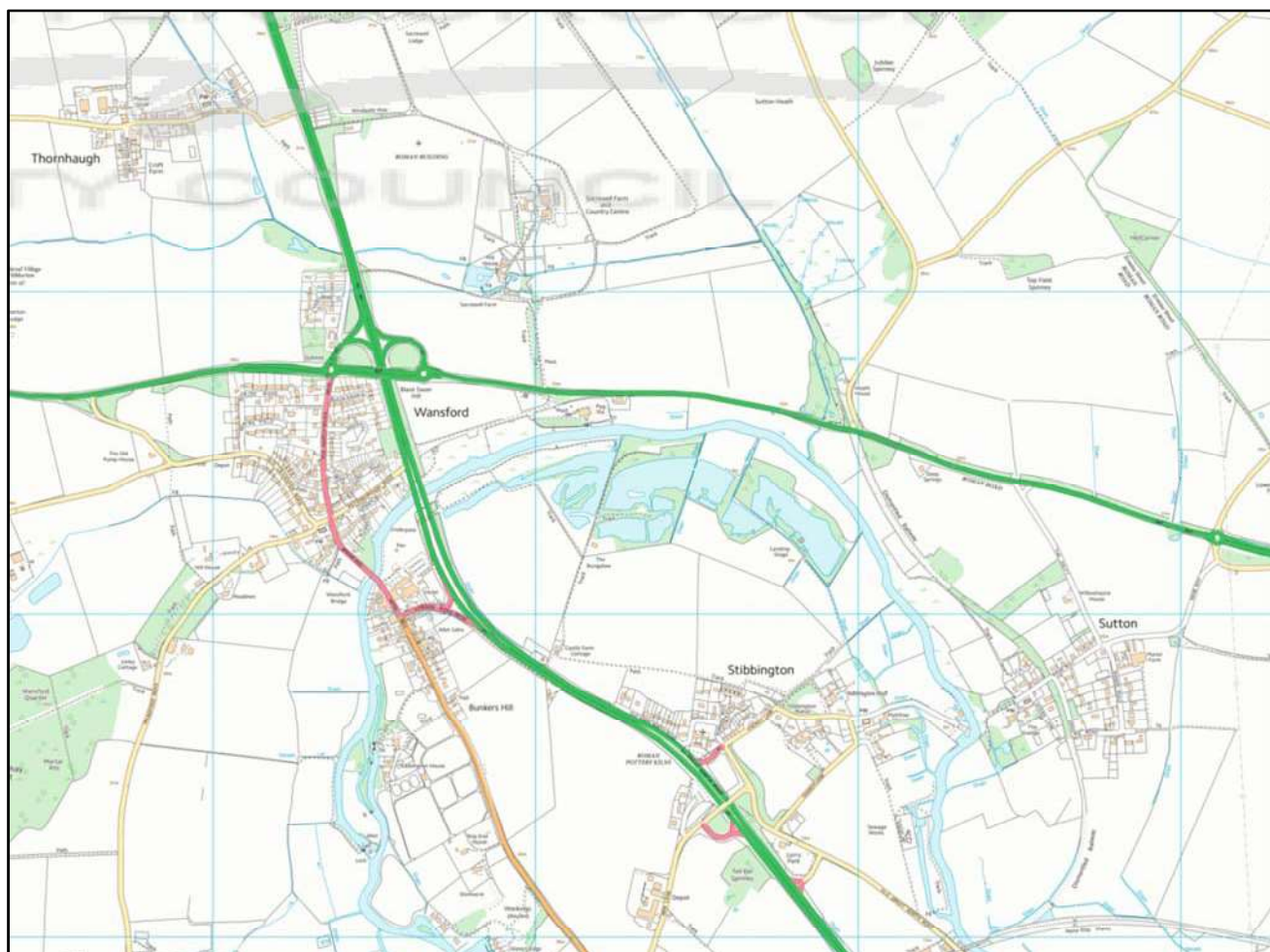
Reference	Relevant Representation	Applicant's Response
	main rivers and the sea. The Environment Agency is also responsible for increasing public awareness of flood risk, flood forecasting and warning and has a general supervisory duty for flood risk management. We also have a strategic overview role for all flood and coastal erosion risk management.	
AS-043-2	<p>3.0 Chapter 13 - Volume 6 - Road Drainage and the Water Environment</p> <p>3.1 Flood risk to the site – We have been working closely with the applicant for some time regarding the issue of flood risk to the proposed development as the site lies within areas of Flood Zone 2, 3a and 3b. The site is at flood risk from the River Nene, designated as a main river, located to the south of the development, and two ordinary watercourses (Whittering Brook and the Mill Channel) that converge and flow into the River Nene at this location.</p> <p>3.2 The applicant has carried out hydraulic modelling to determine the baseline conditions for the site and for the proposed scheme. This included modelling of the Mill Stream and Whittering Brook. We have undertaken a review of the hydraulic modelling and have determined that it is fit for purpose.</p> <p>3.3 As the submitted flood risk assessment utilises information from the hydraulic model, we are satisfied that it is appropriate to the scale, nature and location of the development.</p> <p>3.4 We therefore have no objection to proposed</p>	The Applicant notes these comments.

Reference	Relevant Representation	Applicant's Response
	development consent order (DCO) being granted at this time in relation to flood risk at the site.	
AS-043-3	<p>3.5 Water Framework Directive –We consider that the scheme adequately addresses Cont/d.. 3 water framework directive impacts and mitigates appropriately. In particular, we support the proposals in the Environmental Masterplan (TR010039/APP.6.8) for the works to facilitate mammal passage through the existing A47 and A1 culverts and the provision of additional wetland areas for water quality improvement and habitat creation at Sacrewell Farm.</p> <p>3.6 We therefore have no objection to proposed development consent order (DCO) being granted at this time in relation to WFD at the site.</p>	The Applicant notes these comments.
AS-043-4	<p>4.0 Chapter 9 – Volume 6 – Geology and Soils</p> <p>4.1 Based on the available information, we are satisfied that the risks posed to controlled waters are understood and can be appropriately managed.</p> <p>4.2 We therefore have no concerns at this time with regard to the risks to groundwater from the proposed scheme and have no objection to the proposed DCO being granted at this time in relation to the protection of controlled waters from potential contamination at the site.</p>	The Applicant notes these comments.
AS-043-5	<p>5.0 Development Consent Order</p> <p>5.1 To ensure that the proposed scheme does not result in an increase in flood risk to areas located downstream of the site, we request the following Requirement be included</p>	The draft DCO (AS-010) is being amended to include the EA in Requirement 4 and will be submitted at Deadline 3.

Reference	Relevant Representation	Applicant's Response
	<p>on the DCO: 5.2 The development shall be carried out in accordance with the submitted flood risk assessment, reference number TR010039/APP/6.3, dated July 2021 and the following mitigation measures it details:</p> <ul style="list-style-type: none"> Compensatory storage shall be provided as shown in cation 7.9 (Primary location for the flood compensation area for the River Nene) and will provide a minimum volume of 560m3. Floodplain compensation should be constructed prior to the commencement of any works which will reduce the capacity of the floodplain. <p>These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.</p> <p>5.3 The Environment Agency would wish to be a specific named consultee in respect of the requested Requirement.</p>	
AS-043-6	<p>6.0 Further Representations</p> <p>6.1 In summary, we can confirm that we have no objection to the proposed development, as submitted. However, we reserve the right to add or amend these representations, including requests for DCO Requirements and protective provisions should further information be forthcoming during the course of the examination on issues within our remit. If you have any questions regarding these representations, please do not hesitate to contact me.</p>	The Applicant has noted this comment.

ANNEX A – A47 WANSFORD TO SUTTON ALTERNATIVE VISIONS 4 JULY 2018

(JOINT PROPOSAL FROM WANSFORD AND SUTTON PARISH COUNCILS)



A47 Wansford to Sutton

Alternative Visions

4th July 2018

Wansford Parish Council

Sutton Parish Council

A47 Wansford to Sutton

Alternative Visions

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1 Introduction

1.1 Purpose of this Document

This document has been produced by Wansford Parish Council and Sutton Parish Council, as the elected representatives of the local community, in consultation with the A47 Community Consultation Team (ACCT) comprising members of both parish councils and residents. The purpose is to set out an alternative vision for the upgrading of the A47 to dual carriageway between the A1/A47 junction at Wansford and the start of the existing dual carriageway at Sutton.

1.2 Why This Document is Needed

Both parish councils have asked repeatedly to discuss the project as a group with Highways England and the various statutory planning and environmental organisations involved but Highways England has excluded the Parish Councils from these meetings. The parish councils are very concerned that a balanced view of the issues has not been presented to the other parties. This document sets out the arguments involved and explains why we believe that Highways England has taken the project down the wrong path. This view has been explained to Highways England repeatedly but they appear to have taken little notice of it.

1.3 Background to the Project

The declared aim of the project to upgrade the A47 between Wansford and Sutton is to

- Support the economic growth of the region
- improve the capacity of this stretch of road,
- improve its resilience to disruption
- improve safety
- improve the environment along the road
- give value for money
- improve access along the route for cyclists, pedestrians and horse riders.

Wansford Parish Council and Sutton Parish Council fully support these aims and, at meetings with Highways England, the councils expressed a wish to work to maximise the benefit to the local communities and all users of the A47 while delivering value for money and minimum environmental impact.

1.4 Progress of the Project to Date

In March and April 2017, Highways England carried out a non-statutory consultation on the selection of the preferred route for this project. The information that was published consisted of a constraints map, shown as Figure 1 below, and three route alternatives shown as Figures 2, 3 and 4.

A47 Wansford to Sutton – Alternative Visions

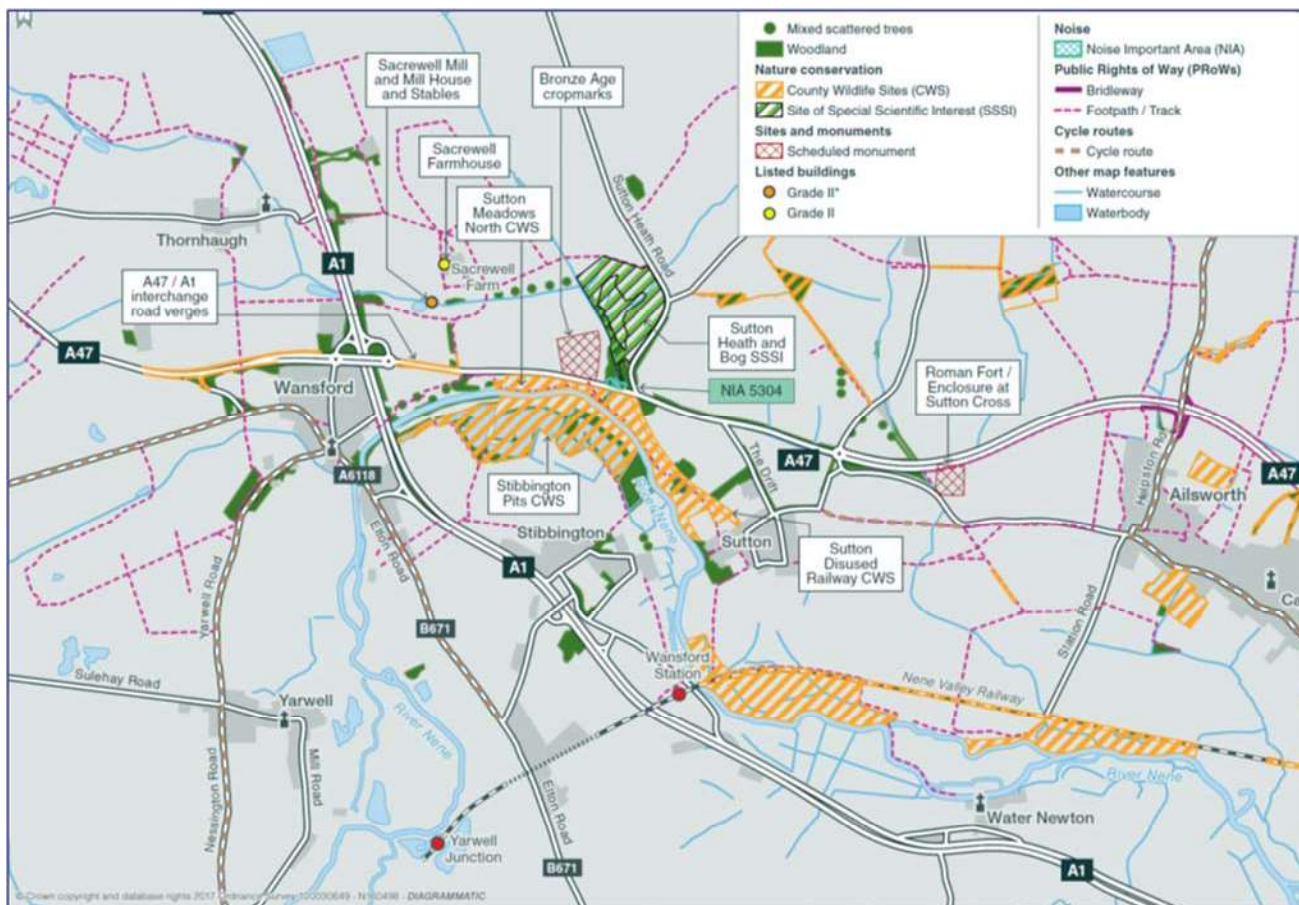


Figure 1 – Highways England environmental constraints plan

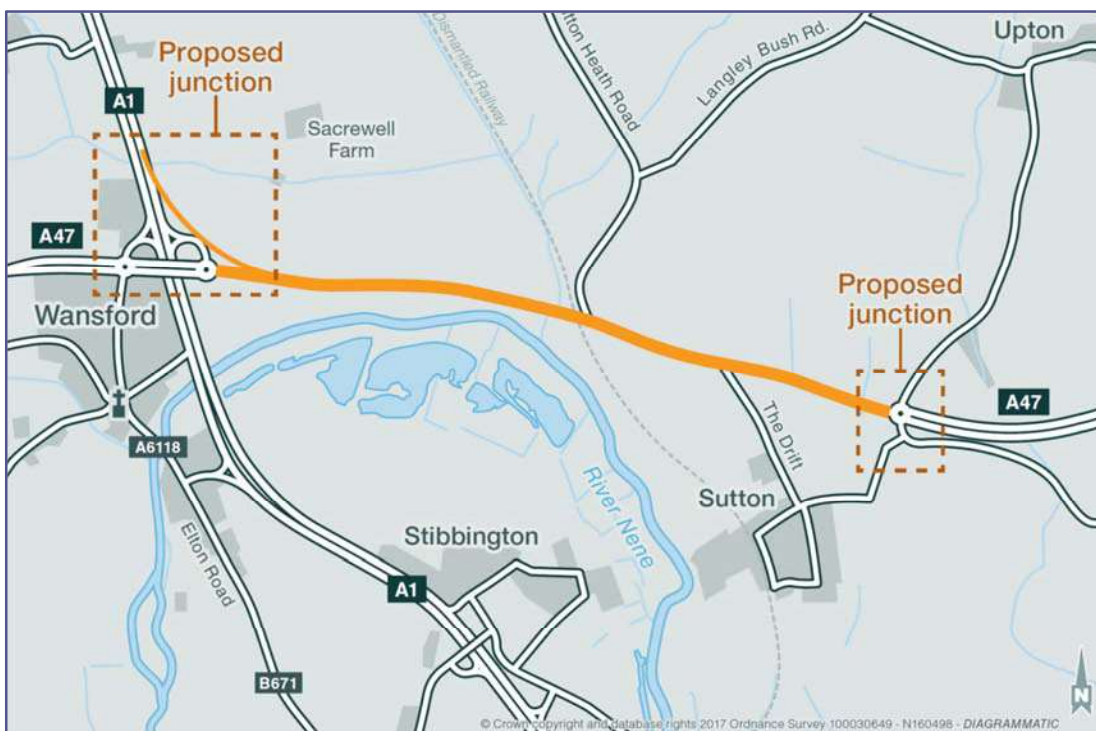


Figure 2 – Highways England Route Option 1 – Construction on the Existing Alignment

A47 Wansford to Sutton – Alternative Visions



Figure 3 – Highways England Route Option 2 – The Southern Route

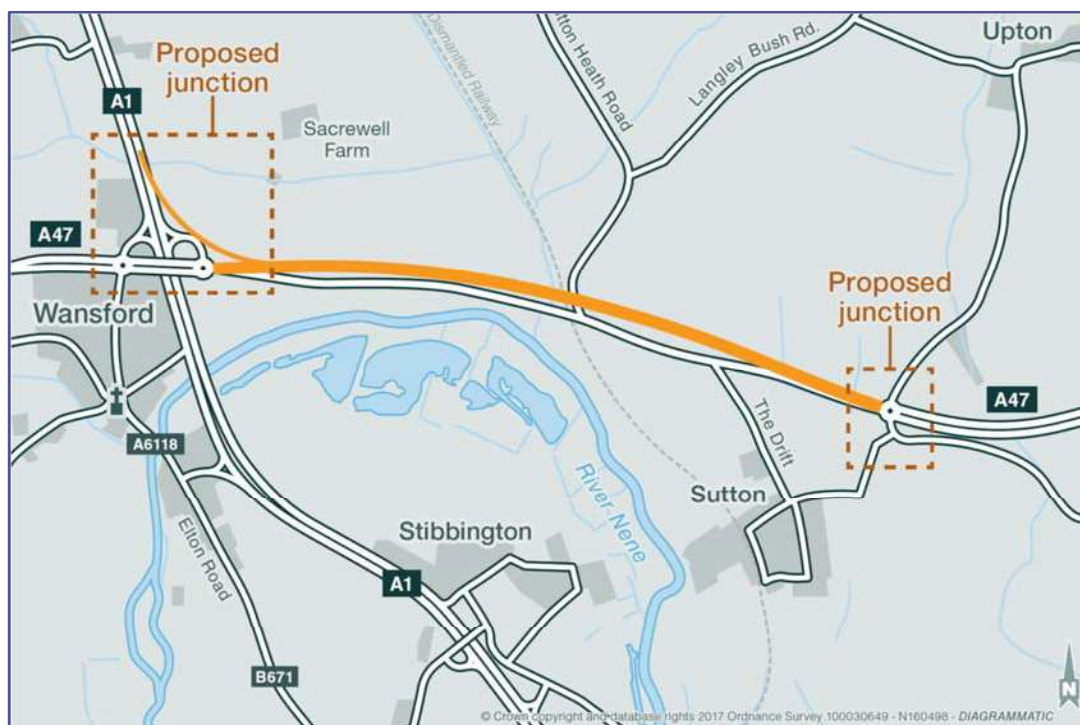


Figure 4 – Highways England Route Option 3 – The Northern Route

A47 Wansford to Sutton – Alternative Visions

62% of those who responded to the consultation favoured the northern route but in August 2017, Highways England published the preferred route as the southern route. The reasons given for this were:-

1. The northern route impinged on a Scheduled Monument (shown as “bronze age crop marks” in the constraints plan).
2. The northern route crossed the Sutton Heath and Bog SSSI.

Both these issues were known about before the consultation and so it seems strange that Highways England included the northern route at all. Subsequent investigations have shown that the northern route does not need to cross the SSSI.

No further details of the decision process were given but the minutes of the meeting were finally published in April 2018 some 10 months after the decision meeting was held.

2 Shortcomings of the Preferred Route Decision

In the minutes of the decision meeting, Highways England stated that the meeting was being held early because of time constraints on the project and that some information was incomplete. Normally the Preferred Route Decision is taken at the end of the Project Control Framework Stage 2 but in this case PCF Stage 2 was only part complete. Two months after the preferred route announcement was made, the project timetable was extended and it has since been extended further. Highways England has not revisited their decision despite the extended time frame.

Taking the published constraints plan and the decision meeting minutes as a guide, it is clear that the project team was not aware of many of the significant features of the area notably:-

1. The extensive archaeological interest in the area in addition to the Scheduled Monument.
2. The presence of the Nene Way footpath along the banks of the river. This is the most popular long distance path in the area. Only the much less popular Hereward Way is mentioned.
3. This area of the Nene valley is a designated Nature Improvement Area as part of an extensive regional programme.
4. The significance of the Nene valley as a wildlife corridor.
5. The status of the Nene valley as an area of High Landscape Value.
6. The Tree Preservation Orders that apply to the woodland to the south of the A47. These woods include significant numbers of oaks with girths in excess of 3 metres meaning they are of considerable age.
7. The presence of three locally listed buildings, the A47 bridge across the old Wansford to Stamford railway, Station House close to the bridge and Heath House further to the north.
8. No reference was made to the geotechnical risks associated with building a road between the existing A47 and the river Nene. This whole sloping area is known to be unstable with both the nearby filling station and the Anglia Water pumping station having moved down the slope. Highways England had been made aware of this.

When the Scheme Appraisal Report was finally published in February 2018 (6 months after it was written), it was clear that no proper desktop study of historic remains in the area had been carried out and that almost all the ecological and environmental studies were incomplete. The document is very

generic with little information directly relating to the road alignment. This was picked up by the Planning Inspectorate in their March 2018 review of the Environmental Scoping.

3 Advantages and disadvantages of the Preferred Route

The southern alignment published as the Preferred Route by Highways England has the following advantages and disadvantages.

Advantages	Disadvantages
Avoids the Scheduled Monument	Cost estimated at £6 million more than the northern route
	Introduces serious geotechnical risks with the likelihood of much increased costs
	Destroys two County Wildlife Sites
	Destroys numerous trees with TPOs
	Impinges on the area of High Landscape Value
	Disrupts the wildlife corridor along the river
	Makes the provision of a safe through route for cyclists, pedestrians and horse riders very difficult
	Moves the road closer to houses increasing noise
	Opposed by the majority of residents from the surrounding communities because of landscape damage to the Nene Valley
	Destruction of archaeology south of the existing road
	All of the proposed route is land in private ownership requiring compulsory purchase from several land owners.

4 Optimisation of the Preferred Route

Since the preferred route announcement, Highways England has expended considerable effort on optimizing the southern route. The results of this have been discussed in meetings between the parish councils and Highways England.

The road alignment has been moved closer to the existing road, reducing the impact on Sutton Village and keeping the road further from the river. Although these changes are welcome, their effect is marginal and the main disadvantages remain. As part of keeping the road away from the river, the embankments have been steepened which significantly increases the geotechnical risk. The steeper embankments also make it more difficult to make provision for cyclists and horse riders.

Highways England has claimed that these changes substantially reduce the costs relative to the northern route. They have been asked to substantiate this but they have stated that the cost estimates are confidential, an unusual view to take on a publicly funded project. In the absence of any demonstration of reduced costs, it has to be assumed that the £6 million cost difference between the northern and southern routes still stands.

5 Discussion of the Preferred Route

Since the preferred route announcement, Highways England has held two public meetings to discuss the project. At both meetings it has been clear that most residents attending strongly oppose the use of the southern route.

In May and June 2018 Highways England held two meetings with representatives of the parish councils and various cycling and footpaths organisations. These discussions have been interesting but they have yielded very little factual information.

Highways England has met three times with Historic England and recently held a meeting with a group of all the environmental organisations who have an interest in the project. The parish councils have asked repeatedly to join these meetings but Highways England has excluded them despite the parish councils being statutory consultees in the project planning process. No minutes from these meetings have been shared with the parish councils despite repeated requests.

It is understood that Highways England have carried out non-intrusive ground investigations to look for buried features in the area. The results of the investigation of the Scheduled Monument have been given to the parish councils, but nothing else. Highways England have given copies of the reports on the other investigations and maps showing their extent to Peterborough City Council and Historic England but they have told the parish councils that they are not available yet.

It is understood from those who have seen the investigation report that there is no identified archaeological interest on the northern road alignment east of the old railway line. This is supported by an independent desktop study of the area commissioned by the parish councils.

6 Alternative Visions for the A47 Dualling

The local community has consistently backed the use of the northern route and, when subject to optimization similar to that applied to the southern route, the result is a layout as sketched in Figure 5

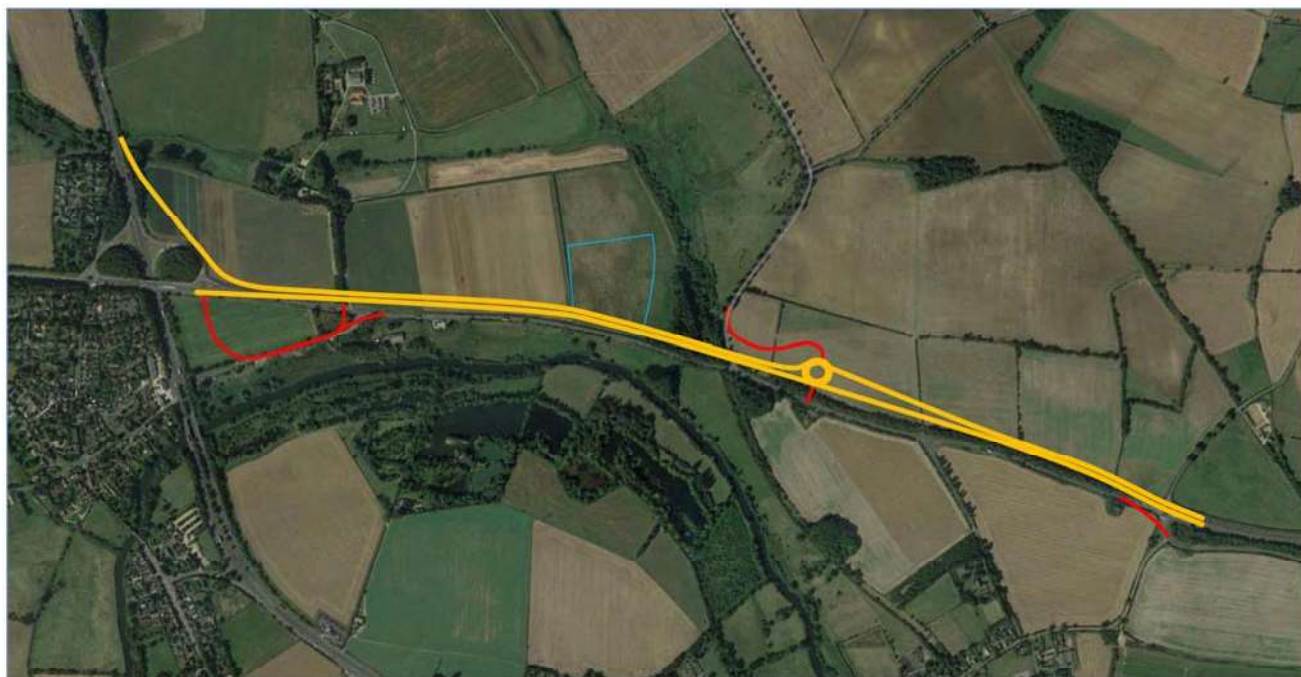


Figure 5 – An Alternative Vision of the A47 Dualling

The western end of this scheme is identical to the Highways England preferred alignment. It impacts the Scheduled Monument (see Section 7 for discussion of this), crosses the old railway line to the south of the Sutton Heath and Bog SSSI and joins a new roundabout just to the east. This roundabout provides a connection to the Sutton Heath Road and also to the existing A47 which is retained as a local service road. The new road then links to the existing dual carriageway with the existing Sutton roundabout being removed. The Upton road is closed with that village being accessed from Sutton Heath Road.

There are several possible variations of this scheme all using the same basic route:-

1. To leave the Sutton roundabout where it is and provide an underpass to link the Sutton Heath Road to the existing A47.
2. To remove the Sutton roundabout completely, use an underpass for the Sutton Heath Road, and have all access from Sutton and Ailsworth along the existing road to join the new road at the eastern Wansford roundabout.

Variation 1 is slightly more expensive while variation 2 will put more traffic on the existing road.

The advantages and disadvantages of this group of schemes are listed below. Comparison with the similar table for the Highways England Preferred Route makes it obvious why the parish councils believe the wrong decision has been made.

A47 Wansford to Sutton – Alternative Visions

Advantages	Disadvantages
Cost estimated at £6 million less than the southern route	Passes through the Scheduled Monument
Very low geotechnical risk	Requires the relocation of the old station building
Safeguards the County Wildlife Sites and woodland to the south of the existing road	
Keeps the Nene valley landscape intact	
Allows the use of the existing road for local traffic, cycling walking and horse riding	
Keeps the road away from houses	
Supported by the majority of local residents	
The eastern section of road is on land already in government ownership	

Although the old station house is classified as a building of local importance it is, because of its location, almost completely unknown to the residents of the area. The building is completely hidden from view with dense tree coverage and a very dangerous access onto the A47. The site is frequently subject to fly tipping from the Sutton Heath Road. The building has been substantially altered with white UPVC windows and other non-period features. It would be of considerably greater significance if it was relocated and there are a number of possible sites for this along the route of the long abandoned Wansford to Stamford railway. The best location is probably at Ufford Halt to the north. At this location there is an open area of land adjacent to the track bed with views across the countryside. The station building would be visible from Sutton Heath Road. The nearby Heath House would not be affected by the proposed road alignment and the old railway bridge would be retained for its existing use.

The land to the north of the existing A47 and to the east of Sutton Heath Road was purchased by the government in the 1970s as the site for the proposed Castor Township and for the upgrading of the A47. Neither of these projects happened under the Peterborough Development Corporation and, after the closure of that organisation, the land has passed through several ownerships within government and is at present owned by the Homes and Communities Agency. In the current revision of the Peterborough Local Plan, the HCA put forward this land for housing development. The western section of this development close to the A47 dualling project failed to get past the first sifting stage and the eastern section, due north of Castor village, did not get into the final plan. It is very unlikely that the western section of this land will be needed for housing in the foreseeable future. It seems very strange that Highways England is proposing to compulsorily purchase land for the A47 improvements when the government already owns land purchased for this purpose.

7 The Scheduled Monument

The Scheduled Monument is in the area known as Toll Bar Field immediately to the north of the existing A47 and to the west of the Sutton Heath Road. The official record for the monument contains little information except that it was declared in 1962 as a result of crop marks appearing on aerial photographs. The listing in the Peterborough local records describes it as a Roman settlement. Since the original listing, little investigation seems to have taken place apart from a series of walkover surveys in the 1970s. The area was ploughed, land drained and used to grow sugar beet and other crops up until 2006 since when it has been set aside or used as pasture. All surface archaeology will have been destroyed. On the surface there is nothing to see except a sloping grass field and the site is generally unknown to the local community and visitors.

Figure 6 shows the approximate area of the Scheduled Monument superimposed on an aerial photograph that shows the crop marks. It is clear that the boundaries of the monument have been drawn to match local field boundaries rather than the archaeology and perhaps the scheduled area should extend further north.



Figure 6 – The Scheduled Monument showing crop marks

In June 2017 Headland Archaeology carried out a magnetometer survey of the Scheduled Monument site and produced a report describing their findings. The main plot of the magnetometer survey is attached as Figure 7.

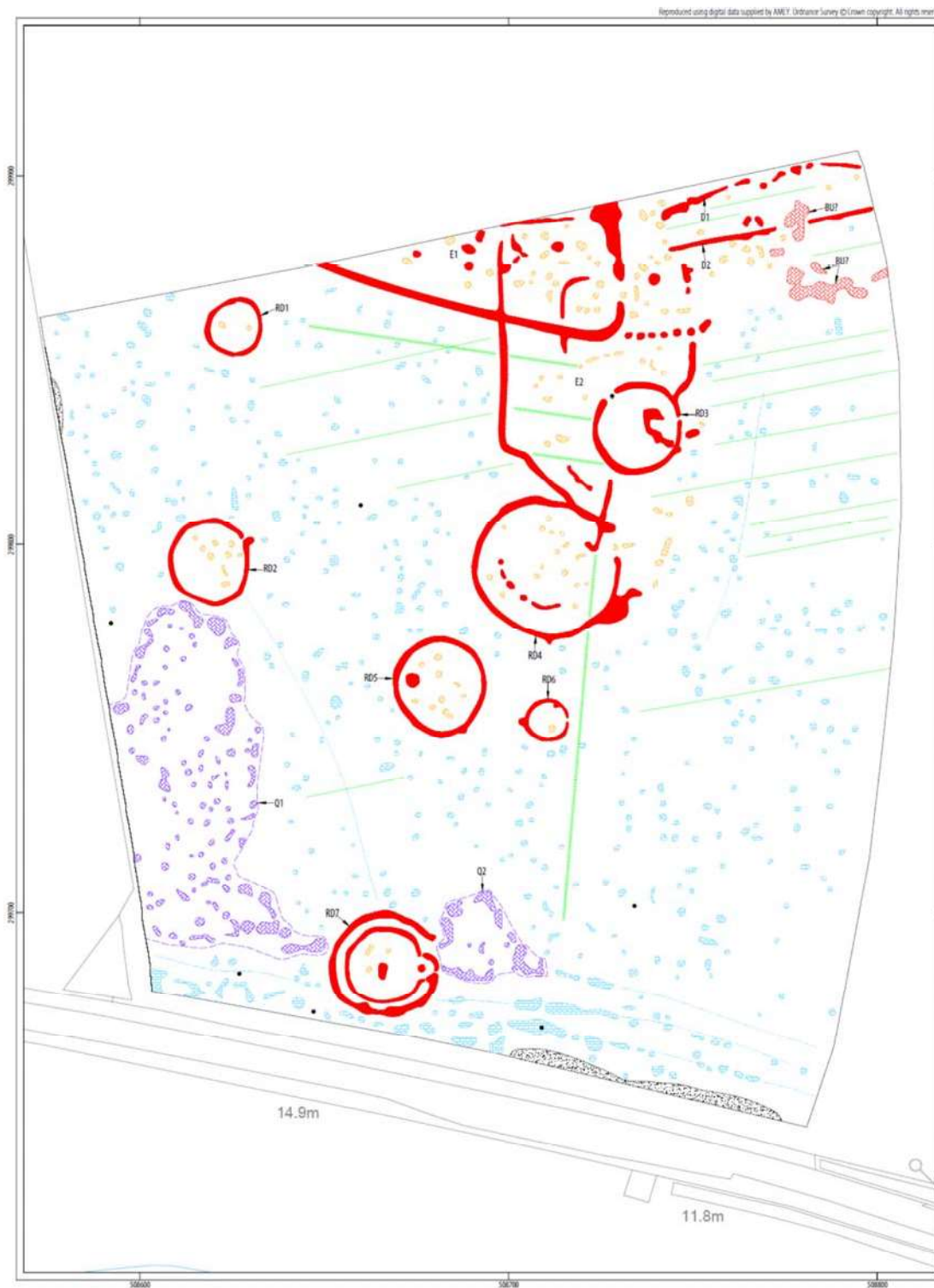


Figure 7 – The Scheduled Monument magnetometer survey by Headland Archaeology on behalf of Highways England

This survey shows a series of outlines at the northern edge of the site which are interpreted as the remains of a Roman settlement. Further south there are 7 ring shapes which are interpreted as bronze age

barrows. On the southern edge of the site there are also two areas of quarrying which are thought to be more recent than the barrow structures. The rest of the southern area of the site is generally clear of identified targets except for modern field drains.

The ring patterns are assumed to be bronze age barrows based simply on their shape. There appears to be no other evidence to support this assumption. The southern barrow shows a different form to the others and expert opinion indicates that this may be from a different period to the other rings. It may be that the southern ring is part of a separate group closer to the river but with no survey results outside the Scheduled Monument it is impossible to confirm this. Bronze age barrows exist at numerous sites in the area and across England and Historic England's claims that these particular barrows are of national significance is not supported by any published evidence.

7.1 The Status of Scheduled Monuments

The position of a Scheduled Monument within the context of a Development Consent Order application for a national infrastructure project is governed by the *National Policy Statement for National Networks (NPSNN)* (Dept. of Transport, December 2014)

This document states that that projects doing substantial damage to a Scheduled Monument will only be approved in exceptional circumstances. This essentially sets up two tests, whether the damage is substantial and whether the circumstances are exceptional.

In this case there is no doubt that avoiding the Scheduled Monument will do permanent and irreversible damage to the Nene valley and risks destroying other unrecorded archaeological assets. Whether that is an exceptional circumstance is debatable.

The other question is whether it is possible to build the new road across the Scheduled Monument without doing substantial damage. This is examined in the next section.

7.2 Crossing the Scheduled Monument

There are four main options for crossing the Scheduled Monument which are discussed below.

7.2.1 Crossing the Scheduled Monument to the North of the Southern Barrow

The Headland report shows a gap of 45m between the southern barrow and the next feature to the north. The proposed dual carriageway requires a 25m wide corridor including verges and fence lines. The Headland magnetometer survey shows no targets in this area that the road would traverse so it would appear that there is no damage to any known archaeology. This approach would separate the southern barrow from the others but there is some indication that it is from a different period historically and not necessarily linked to the other barrows. If it is proved that there are further archaeological remains between the A47 and the river, this approach would group the south barrow with them which may be correct for the context of this barrow. This route is illustrated in Figure 8. Before this route could be adopted there is a need to investigate in detail the proposed road route through the Scheduled Monument. There are a number of ways of doing this either by trenching or by more sophisticated non-intrusive methods.

A47 Wansford to Sutton – Alternative Visions

£6 million difference in cost between this and the southern route would allow significant expenditure on the excavations and display. Excavating this barrow would leave the rest of the site completely untouched and considerably increase the understanding of the rest of the monument for both professional archaeologists and the public. This option is shown in Figure 9.

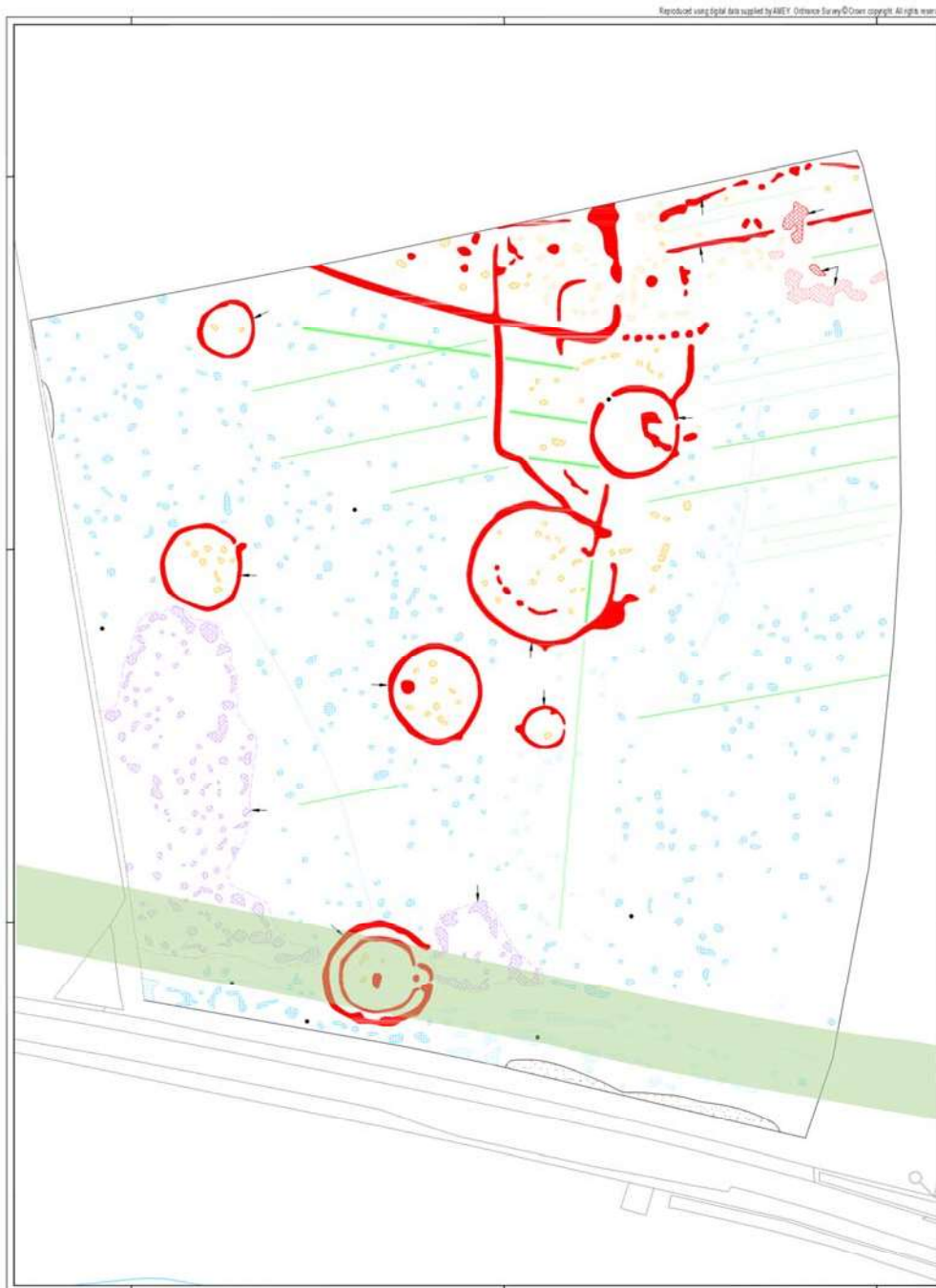


Figure 9 – The A47 Routed over the Southern Barrow

7.2.3 Bridging over the Southern Barrow

The southern barrow has a diameter of 27m according to the Headland report. It would be possible to bridge across this area, leaving the barrow completely untouched. Although such a bridge is expensive,

it would still leave the northern route considerably lower in price than the southern option. This solution has been used at other locations. The plan layout for this is the same as in Figure 9.

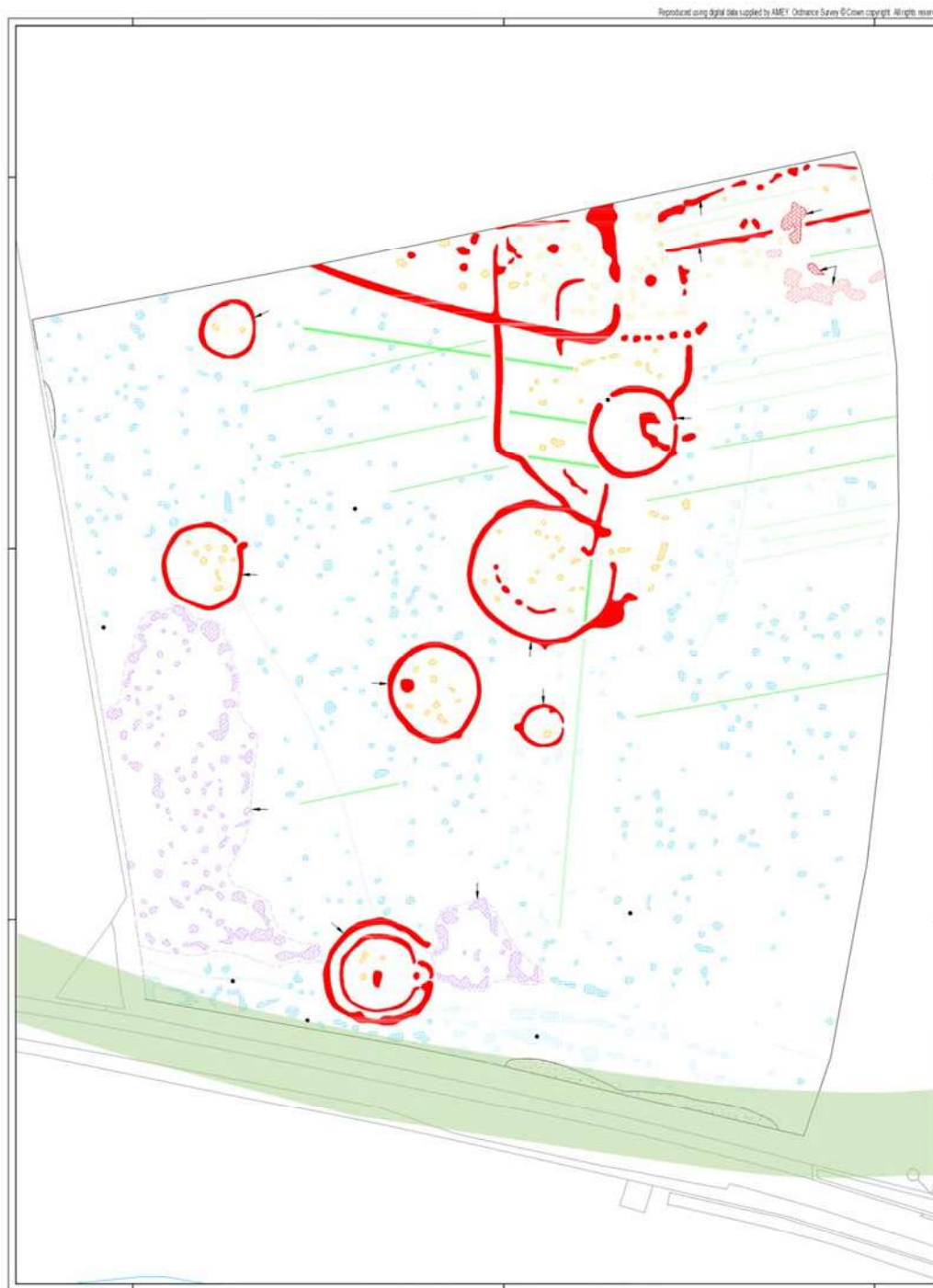


Figure 10 – Passing to the south of the barrows

7.2.4 Passing Through the Southern Corners of the Scheduled Monument

The fourth option would be to build the road across the south west corner of the Scheduled Monument, passing approximately 10m south of the southern barrow and then re-entering the area and cutting across the south east corner. This leaves all the barrows intact. The only areas of the Scheduled Monument

A47 Wansford to Sutton – Alternative Visions

being covered are those which have been quarried in more recent times. This option, whilst enabling the northern route to be adopted to the east of the monument, fails to overcome concerns about the impact on the Nene Valley and the difficulty of providing a continuous parallel cycling/walking/horse riding route. It is shown in figure 10,

7.2.5 Passing Close to the Southern Boundary of the Scheduled Monument

This option is similar to that shown in Figure 10 except with the road moved south to avoid impinging on the actual footprint of the Scheduled Monument. This pushes the new road further into the river valley, with all the complications described above, but would still allow the use of the northern alignment east of the Scheduled Monument.

8 Conclusions

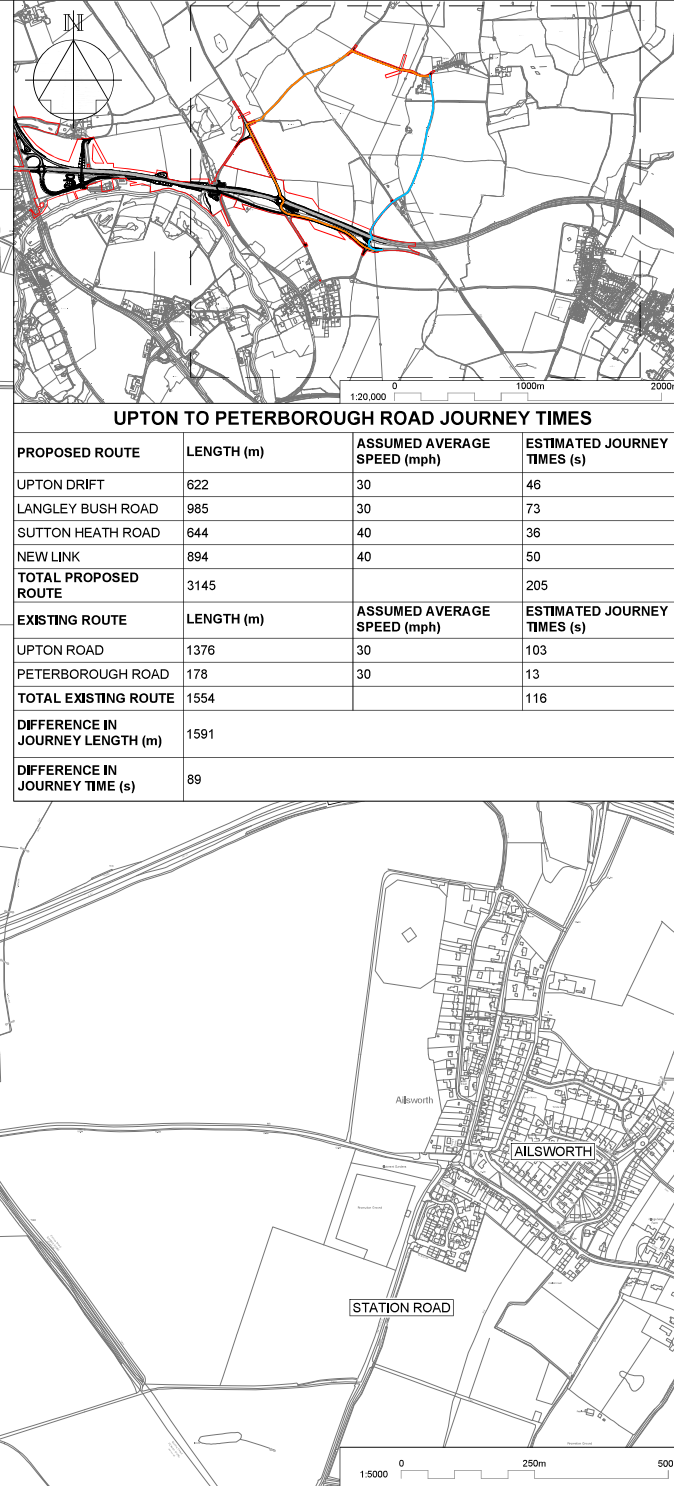
It is clear that the use of the northern route for the A47 Wansford to Sutton Dualling saves a great deal of money when compared with the southern route and avoids the permanent destruction of the ecology and landscape of the Nene valley. It also avoids substantial geotechnical risks in the construction of the road.

Using the northern route will impact the Scheduled Monument but it seems possible to build the road without touching any of the features for which the site is listed. This does not appear to represent substantial damage to the site.

The issue is where the balance between these options lies. In the view of the two parish councils and the local residents, a northern route minimizing impacts on the Scheduled Monument is the preferred option.

To take this forward, the section of the Scheduled Monument in the proposed road alignment should be investigated in more detail to check that nothing of significance will be damaged. These investigations should be undertaken by Highways England to unlock a potential saving of approximately £6 million on the project cost.

ANNEX B - UPTON TO PETERBOROUGH ROAD - DIFFERENCE IN JOURNEY TIMES



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