

APPLICATION BY: Highways England for an Order Granting Development Consent for the A47 Wansford to Sutton scheme

PLANNING INSPECTORATE REF: TR010039

Response by Peterborough City Council to Examiners Questions

Ex1	Question to:	Question:	PCC Response
1.0	General Questions		
1.0.14	PCC	<p>Development Plan</p> <p>a) Could PCC and HDC please provide respectively a copy of the Peterborough Local Plan and the Huntingdonshire Local Plan which may affect consideration of the Proposed Development, along with appropriate extracts and key from the policies map?</p> <p>b) Could PPC and HDC indicate any parts of their Plan which they consider to be of particular relevance to the consideration of the Proposed Development?</p> <p>c) Is either Local Plan subject to review?</p> <p>d) If so, at what stage has it reached?</p> <p>e) Does any emerging Local Plan review have any implications for the Proposed Development?</p>	<p>a) The Peterborough Local Plan, proposals map, village inset maps and key from policies map are attached separately.</p> <p>b) The following policies are of particular relevance:</p> <p>Policy LP1: Sustainable Development and the Creation of the UK's Environment Capital Policy LP7: Health and Wellbeing Policy LP11: Development in the Countryside (part F) Policy LP13: Transport Policy LP15: Safeguarded Land for Future Key Infrastructure Policy LP16: Design and the Public Realm Policy LP17: Amenity Provision Policy LP19: The Historic Environment Policy LP22: Green Infrastructure Network Policy LP24: Nene Valley Policy LP27: Landscape Character Policy LP28: Biodiversity and Geological Conservation</p>

			<p>Policy LP29: Trees and Woodland Policy LP32: Flood and Water Management Policy LP33: Development on Land Affected by Contamination</p> <p>c)The Local Plan is not currently subject to review.</p>
1.0.15	PCC	<p>Development Plan The Cambridgeshire and Peterborough joint Minerals and Waste Plan was adopted on 28 July 2021. Are there any implications of this for the consideration of the Proposed Development?</p>	<p>The C&P Minerals and Waste Local Plan, has, to all intents and purposes, the same requirements for mineral safeguarding as the previous C&P Minerals and Waste Core Strategy. As such, it is not considered necessary to review the submitted Minerals Impact Assessment.</p>
1.0.16	PCC	<p>Neighbourhood Plans a) Could PCC and the Parish Councils please provide details of any designated Neighbourhood planning areas, along with current details of progress towards any such Neighbourhood Plans being made. b) Where Neighbourhood Plans have been made, published for consultation, or later, purposes could copies please be provided, along with any relevant documents, such as Examiner Reports.</p>	<p>Neighbourhood Plans 'adopted' in Peterborough:</p> <ul style="list-style-type: none"> • Peakirk (full parish) - made 26 July 2017 • Ailsworth (full parish) - made 13 Dec 2017 • Castor (full parish) - made 13 Dec 2017 • Glinton (full parish) - made 28 July 2021 • Barnack (all parish except Burghley Park Estate) - made 28 July 2021 <p>Submitted Neighbourhood Plans:</p> <ul style="list-style-type: none"> • Helpston (full parish) - currently at regulation 18 consultation (end 15 February 2022). Examiner appointed. <p>Neighbourhood Plans are attached separately.</p>
1.0.21	All Parties	<p>Covid-19 pandemic a) Does any party have any view as to whether the Covid-19 pandemic has had any material implication as to how the Proposed Development should be considered?</p>	<p>PCC has no view on this.</p>

		b) If so, they should explain why they hold that view, evidenced where possible.	
1.0.22	All Parties	Environment Act 2021 All parties are given the opportunity to make comment in light of the passing into law of the Environment Act 2021 in relation to the consideration of the Proposed Development. Any response should make reference to those applicable parts of the Act that have come into force, those which come into force on a stated date and those parts which will come in force by Regulation.	PCC response: PCC acknowledges the passing into law of the Environment Act 2021. It is noted that we are still going into a transition period until many of the requirements become mandatory. If the project is significantly delayed PCC reserves the right to make comment at that time.
1.1	Air Quality and Emissions		
1.1.1	PCC	Affected Road Network a) Do IPs, particularly the Councils, agree with the extent of the Affected Road Network as defined by the Applicant? b) If not, could you please explain why you think it should be different, setting out the extent and giving reasons for your position.	Agree with the Affected Road Network.
1.1.2	PCC	Risk of Poor Air Quality a) Do IPs, particularly the Councils, agree with the Applicant (paragraph 5.4.10 of Chapter 5 of the ES [APP-043]) that where the PM10 concentrations are lower than the threshold, it can be assumed there is no risk of the PM2.5 threshold being exceeded and consequently, there is no need to model PM2.5? b) If you do not agree, please explain why you take the view that you do, and what implications this may have.	Air Quality Objectives Contained in the Air Quality (England) Regulations 2000 (2002 as Amended) does not include an objective for PM2.5. Therefore, there is no regulatory standard applied to the PM2.5 role (for local authorities in England) with respect to action to reduce emissions or concentrations of fine particulate air pollution (PG16, DEFRA, April 2016).
1.1.3	PCC	Air Quality Assessment a) Do the IPs, particularly the Councils, agree with the Applicant's assumptions set out in paragraph	The NOx to NO2 conversion model used is a DEFRA model. All of the modelled DS NO2 levels are below the threshold limit. The majority of receptors are in an

		<p>5.4.18 of Chapter 5 of the ES [APP-043] in relation to the NOx to NO2 conversion and the use of “All other urban UK traffic” for modelling purposes?</p> <p>b) If you do not agree, please explain why you take the point of view that you do, what, if any alternative model you would use, and what implications this may have.</p>	<p>urban area. The use of the option of “All other urban UK Traffic” seems reasonable.</p>
1.1.8	IPs	<p>Air Quality Assessment</p> <p>a) Do the Government’s policy statements ‘Decarbonising transport: a better, greener Britain’ and ‘Net Zero Strategy: Build Back Greener’ have any implications for the air quality assessment on the basis that this would result in an increase in electric vehicles rather than those powered by internal combustion engines, as electric vehicles do not emit gases of combustion?</p> <p>b) If so, what would be the resultant effects?</p>	<p>It is not anticipated that either scenario will affect the significance. Table 6.3 of Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) Planning for Air Quality Guidance determines significance.</p>
1.1.10	PCC	<p>Greenhouse Gas Emissions and Climate Change adaptations</p> <p>With respect to greenhouse gas emissions, the cumulative impact assessment that the Applicant has undertaken is limited. At paragraph 14.8.9 of the Chapter 14 of the ES [APP-052] it is predicted that the Proposed Development would contribute 0.0078% to the UK’s fourth, fifth and sixth Carbon Budgets.</p> <p>However, the Proposed Development has been assessed in isolation from any in combination effects associated with the implementation of projects forming part of the Road Improvement Strategy. While the Proposed Development of itself may have a limited effect on greenhouse gas emissions, this scheme when taken with others might ‘... have a material effect on the ability of the Government to</p>	<p>No comment.</p>

		<p>meet its carbon reduction targets' (paragraph 5.18 of the NPSNN).</p> <p>In light of the quashing of the A38 Derby Junctions DCO by the High Court, further representations are requested on the following matters:</p> <p>a) the carbon impact of the development; the implications, if any, of the development in relation to the Paris Agreement and the UK's nationally determined contribution under the Paris Agreement, the 2050 net zero target in the Climate Change Act 2008, and carbon budgets set under the 2008 Act (including the sixth carbon budget as set out in the Carbon Budget Order 2021);</p> <p>and, whether the increase in carbon emissions resulting from the development is so significant that it would have a material impact on the ability of the Government to meet its carbon reduction targets;</p> <p>b) the direct, indirect and cumulative likely significant effects of the development on climate, including greenhouse gas emissions and climate change adaptation, in light of the requirements set out in the EIA Regulations and in light of paragraphs 5.17 and 5.18 of the NPSNN.</p> <p>The Assessment should provide (or, to the extent that it has already been provided, identify) its assessment of the cumulative effects of Greenhouse Gas emissions from the scheme with other existing and/or approved projects on a local, regional and national level on a consistent geographical scale (for example an assessment of the cumulative effects of the Road Investment Strategy RIS 1 and RIS 2 at a national level).</p> <p>This should: take account of both construction and operational effects; identify the baseline used at each local, regional and national level; and identify</p>	
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1.1.12	PCC	Emissions from maintenance activity a) The Applicant considers in paragraph 14.5.2 of the ES [APP-127] that including carbon emissions from future activities beyond the replacement of the wearing surface course due to inherent uncertainty over frequency and extent. Do IPs consider that a reasonable approach? b) If not, what approach should be followed, and does the respondent have any information which could assist that assessment?	No concerns about emissions from maintenance activities.
1.2	Biodiversity, Ecology and Natural Environment (including Habitats Regulations Assessment (HRA))		
1.2.2	PCC	Assessment criteria Paragraph 8.4.21 of the ES [AS-015] sets out the assessment criteria for biodiversity. a) Given the location of the application site close to the boundary with Cambridgeshire and Northamptonshire, the latter being in a different English Region, could the Applicant explain why the relative biodiversity resource importance were not considered in relation to the East Midlands Region, and Cambridgeshire and Northamptonshire. b) Do IPs agree with the Applicant's approach, or do they consider other geographic areas should be considered?	Yes PCC agrees that the applicant's approach takes into account the relevance of biodiversity resource importance in relation to other regions. It is accepted that within paragraph 8.4.21 that Peterborough appears to be being singled out as the only county where the importance of a biodiversity resource will be considered. Upon closer inspection of paragraphs within section 8.7 (E.G. 8.7.25, 8.7.43 & 8.7.51) it appears that wider Cambridgeshire and even Norfolk has been considered. The only correction to be made is ensuing that it is made clear that other regions have been considered already.

		<p>c) If IPs consider other geographic areas should be considered, then could they please explain what that area should be and why they hold that view.</p> <p>d) Could the Applicant please undertake a sensitivity analysis on the assessment based on comparisons with the East Midlands Region, and Cambridgeshire and Northamptonshire.</p>	
1.2.3	IPs	<p>Surveys</p> <p>a) Table 8-3 in Chapter 8 of the ES [AS-015] indicates that a number of the ecological surveys that were undertaken are three or more years old. Please can the Applicant explain why it considers the surveys remain current and whether the age of the survey data introduces any uncertainty into the biodiversity assessment?</p> <p>b) Do any IPs consider that any of the surveys are no longer current? If so, could these please be specifically identified, with a reason given for the view held.</p>	<p>Yes PCC agrees that as of the 21st of January 2022 the surveys are still in date. The survey reports either state within them a specific date to which the survey will be valid too (generally within the limitations or at the start of the document) or do not make reference to length of validity at all.</p> <p>It is worth noting however that several of the specified dates are rapidly approaching and will most likely require a re-survey before works can begin.</p> <p>The following species are listed with the following dates when a refresher survey will be required.</p> <p>Great Crested Newts – March 2022 Reptiles – March 2022 Wintering Birds - March 2022 Water vole and Otter – March 2022 Bat Emergence and re-Entry – July 2022 Bat Activity – September 2022</p> <p>The other reports either did not state the date the data was valid until or I was not able to locate the date within the document. The reports that did not state a date upon which a refresher survey will be required to ensure validity of the results will be assumed to have a two year span from the date upon which the survey</p>

			was first undertaken before a refresher survey is required. As such many of the surveys are going to require resurvey in the year 2022.
1.2.5	PCC	Biodiversity Zones of Influence a) Do IPs consider the Zones of Influence set out in Table 8-2 of Chapter 8 of the ES [AS-015] for biodiversity resources are appropriate? b) If not, could you please explain which ones you consider to be unsuitable giving a full explanation for your views.	Yes PCC is satisfied that the Zols are standard for the scale of the proposed development.
1.2.6	IPs	Construction and operational impacts on ecology a) Do IPs agree with the Applicant's assessment of impacts during both construction and operation as set out in Tables 8-9 and 8-10 of Chapter 8 of the ES [AS-015]? b) If not, could you explain why not and what needs to be amended? Construction and operational impacts on ecology a) Do IPs agree with the Applicant's assessment of impacts during both construction and operation as set out in Tables 8-9 and 8-10 of Chapter 8 of the ES [AS-015]? b) If not, could you explain why not and what needs to be amended?	PCC satisfied that the operational impacts on ecology are suitably summarised within those tables.
1.2.7	IPs	Construction and operational ecological mitigation a) Do IPs agree that the Applicant's approach to ecological design and mitigation measures during construction and operation as set out in Tables 8-11 and 8-12 of Chapter 8 of the ES [AS-015] are appropriate? b) If not, could you explain why not and what needs to be amended?	PCC agrees in principle with all proposed mitigation measures as set out within table 8-11 and 8-12, however below are further specific comments organised by ecological receptor: Sutton Meadows North and South Dismantled Railway CWS – While the quantity of habitat appears to be suitable for replacement of the habitat lost to the CWS,

			<p>replication of the ecosystem that is present within the CWS will be a deciding factor to whether this compensation is suitable. The success of this replication is dependent on the Habitat Management Plan which has not yet been published. It is paramount that this document is reviewed as soon as possible and that it achieves realistic goals. Establishment of biodiverse habitat is an extended operation often lasting many years, and even longer for required ongoing management. The HMP will need to be created with a minimum 30 year time frame. Care should be taken so that no single habitat is completely wiped out from the CWSs before compensation habitat is produced that can accept “refugee” species.</p> <p>Botanical – Opportunities to transfer the existing seed base to the newly created site should be taken where ever possible I.E. if species rich grassland is to be disturbed, before disturbance starts a very high cut should be performed and seed heads/pods collected from the arisings before being transferred to the new site. There opportunities are opportunistic as many seeds do not remain viable unless properly stored which may be impractical. As such this seed transferal will only be possible if receptor habitat is available at the time of cutting. This is only one example however, all opportunities to transfer the existing species base should be taken where possible.</p> <p>Reptiles – It is stated that reptiles found during habitat clearance will be moved to a suitable safe area. This safe area needs to be defined before works begin. It is hoped that this definition will be within the Environmental Management Plan however it should be included within this document as well.</p>
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1.2.27	PCC	<p>Habitats Regulations Assessment Can the parties please comment on the NSER and whether they consider it to be satisfactory.</p>	<p>Yes satisfied that the NSER and the conclusions it reaches are appropriate.</p>
1.3	Compulsory Acquisition (CA), Temporary Possession (TP) and Other Land or Rights Considerations		
1.3.8	IPs	<p>Human Rights Act</p> <p>a) Do parties consider that the Applicant's approach as set out in Section 6 of the Statement of Reasons [APP-020] is a fair summation? b) If not then, please explain why and if they consider the balance has been inappropriately described.</p>	<p>The Applicant's approach is a fair summation.</p>
1.4	Cultural Heritage		
1.4.3	PCC	<p>Identification of heritage assets a) Do the IPs agree with the list of heritage assets identified in Appendix 6.1 [APP-085]? b) If not, (i) if the party considers any heritage asset has been omitted could they please set out a table of such assets and why they consider each to be of heritage significance; (ii) if the party considers that any identified assets should not be considered to be a heritage asset or has been incorrectly attributed (for example to an incorrect list), again could they be set out in a table and explain why they hold the view they do?</p>	<p>Yes with reference to heritage assets of archaeological interest, provided that it is stated that:</p> <ol style="list-style-type: none"> 1. The list reflects the status quo of knowledge prior to the implementation of the programmes of field evaluations undertaken between 2018 and 2020 (Appendix 6.1, 6.2.112 [APP-085]); 2. Potential heritage assets of archaeological interest identified in the course of such programmes may be recognised as having archaeological significance as fieldwork progresses. <p>It should be noted that several of the heritage assets identified are not noted having a designation when</p>

		.	they are in fact Listed. These include Sacrewell Lodge and Mill, various building on Bridge End, Sutton and Old North Road and St Johns the Baptist. It is noted however that some assets have been included twice.
1.4.4	PCC	<p>Identification of heritage assets</p> <p>It is not clear from paragraph 6.6.67 of Chapter 6 of the ES [APP-044] whether the Stamford to Wansford railway line is being considered as a non-designated heritage asset in its own right or as part of the “group”.</p> <p>a) Could the Applicant please clarify and could IPs give their opinions as to how it should be considered?</p> <p>b) If the Applicant or any IP considers that the railway line should be considered to be a non-designated heritage asset in its own right, could they please provide a plan showing the geographic extent.</p>	<p>Wansford railway line may be considered as a non-designated heritage which is part of a ‘group’ for group value. The railway line has been largely dismantled with only the layout surviving as an earthwork visible on remote imaging (below). It retains local historic significance in its own rights regardless of the loss of features and the loss of group value.</p> <p>a) PCC considers the Stamford to Wansford railway line a non-designated heritage asset in its own right, and as part of the current Local List Project has been assessed by a panel and is proposed for the Local List in its own right.</p> <p>b) Plan attached separately.</p>
1.4.5	PCC	<p>Assessment of non-designated heritage assets</p> <p>a) Could the Applicant and IPs give their view as to whether in the light of the decision of the High Court in <i>Save Stonehenge World Heritage Site Limited v Secretary of State for Transport</i> [2021] EWHC 2161 (Admin) the effect on each non-designated heritage asset should be considered individually rather than as a group?</p> <p>b) If the Applicant takes the view that each non-designated heritage asset should be considered individually could it please undertake such an assessment for all assets which have been considered as a group.</p>	<p>With reference to the archaeology, the heritage assets identified as a group may be retained as a group.</p> <p>a) The effect on the three Locally Listed Heritage Assets (former railway station, Heath House, Sutton Bridge) and the two proposed Locally Listed Assets (Milestone on A47 and Stamford to Wansford Railway Line) need to be assessed individually. This is due to the direct impact of the proposals on each of the heritage assets.</p>

1.4.11	PCC	Conservation Areas a) Could PCC and HDC advise whether Conservation Area Appraisals (or similar documents) have been prepared for any of the Conservation Areas said to be affected by the Proposed Development? b) If so, could they be provided?	a) Conservation Appraisals have been prepared for Sutton, Wansford (PCC section), Ailsworth, Thornhaugh, Castor and Southorpe. b) Conservation Area Appraisals attached separately.
1.4.15	PCC	Archaeology a) Paragraph 6.5.9 of Chapter 6 of the ES [APP-044] indicates some areas have not been archaeologically tested. How can the SoS assess the particular significance of any heritage asset that may be affected (NPSNN, paragraph 5.128) if there is no available evidence on this? b) Similarly, paragraph 6.6.73 of Chapter 6 of the ES [APP-044] sets out the various zones of archaeological interest. Neither Zone 8 nor Zone 9 has been surveyed. c) Is it intended to undertake any further survey work? d) If so, when will those results be reported?	a) The areas which have not been investigated are part of the new proposed route. The archaeological investigations conducted to date have been targeted on the original route. b) The same applies to Zones 8 and 9. c) A programme of field work to include all additions/changes to the route, as well as areas formerly unavailable, has been agreed. d) As with the remaining investigations along the whole of the route, this programme of fieldwork should be carried out pre- application unless otherwise agreed with PCC and HMBCE (for work affecting the Scheduled Monument). The applicant should provide a preliminary assessment of potential using the available baseline information and a timescale
1.4.17	PCC	Archaeology a) Do the IPs agree with the Applicant's approach to assessing effects by grouping assets into zones of archaeological potential? b) If not, could they provide a view as to how they should be assessed?	With reference to the archaeology, the Applicant's approach to assessing effects by grouping assets into zones of archaeological potential is acceptable in principle. However, in the absence of a geo-referenced map showing the location of the 'zones' referred to in Chapter 6 of the ES [APP-044], it is not

			possible to comment. A map clearly showing the aforementioned 'zones' in relation to the archaeological features identified to date (e.g., trial trenching plans and geophysical survey plots) should be provided. In addition, revisions and amendments may be required upon submission of the Written Schemes of Investigations, and in consideration of further details and ongoing fieldwork results.
1.4.18	PCC	Archaeology Paragraph 6.8.19 of Chapter 6 the ES [APP-044] indicates that PCC "usually requires archaeological WSI to be written by the appointed archaeological contractor undertaking the work". However, this paragraph continues "government policy may require an agreed scope of works in order to undertake appropriate procurement". Do HBMCE and PCC have any views on this approach?	No issues. A Scope of Work (SoW) in this context has the meaning of what is sometimes referred to as a 'Statement of Work', i.e., a working agreement of common understanding between two or more parties on project objectives. In this instance, the document would also be used to undertake appropriate procurement (e.g., tendering and recruitment). A Written Scheme of Investigation (WSI) is a method statement that details the approach to undertaking an agreed programme of archaeological work (which may or may not have been preliminarily agreed through a SoW). It specifies how the work will be undertaken against set objectives and in compliance with both national and local policies, guidelines and standards. Typically, a WSI will specify the methods of work, research aims, the legal requirements and other obligations, health and safety, staffing, timing. It is written to fulfil the requirements specified in a brief issued by the LPA. In synthesis, the WSI is a subset of the SoW which describes how the project objectives will be achieved. Both the SoW and the WSIs must be submitted to and approved by PCC LPA.
1.4.19	PCC	Mile Marker a) PCC has identified the Mile Marker on the north verge of the A47 to the east of the petrol station. Could the Applicant please clarify how protection of	Yes, the Mile Marker is a non-designated heritage asset of local, if not national importance. Many milestones are on Historic England's National List.

		<p>this is to be ensured during any construction operations and thereafter?</p> <p>b) Does PCC consider the mile marker to be a non-designated heritage asset?</p>	<p>Mile Marker as a NDHA and as part of the current Local List Project has been assessed by a panel and is proposed for the Local List.</p>
1.4.20	PCC	<p>Wansford Road Railway Station</p> <p>a) The Applicant has indicated that it considers that the loss of the Wansford Road Railway Station would result in a moderate adverse significance of effect. Do IPs agree with this analysis?</p> <p>b) If not, could the party please explain why they hold that view?</p> <p>c) Could the Applicant please explain how its approach is reconciled with the advice in the PPG Reference ID: 18a-018-20190723 relating to substantial harm and less than substantial harm.</p> <p>d) Could the parties please set out the level of harm that they consider would be caused by the Proposed Development for the Wansford Road Railway Station in all its elements, both individually and cumulatively?</p> <p>e) Could the Applicant please explain what its proposals are for the recording of the asset, and how they would be secured?</p> <p>f) It is suggested by PCC that the Station Building may be dismantled and reerected in another location. Could the Applicant please give its response to this suggestion and if it is agreeable, explain where it would be located and how this would be secured?</p> <p>g) Could the Applicant please explain further its proposals for the gate piers at the station?</p>	<p>a) PCC does not agree with this assessment</p> <p>b) There is agreement that the initial impact of the proposal is 'Major Adverse' but there is disagreement that the proposed mitigation reduces this to 'Moderate Adverse'. The recording of a heritage asset does not reduce the impact of its demolition on its significance. Recording as per NPPF 205 is required where there is a loss of significance however whether recording can or cannot be implemented is not a factor in considering whether the proposals are acceptable. The only mitigation that could reduce the harm is its relocation. Although this is being considered, and there is no reason at this stage to suggest that it won't be relocated, it does not at this stage form part of the proposals. There is therefore disagreement that the mitigation proposed would reduce the impact from major adverse to moderate adverse. The retention of other elements are considered separate heritage assets to the former station and their retention should not be included within the benefit of Locally Listed station.</p> <p>d) Wansford Road Railway Station, The proposals would result in its total loss of significance. As such there is agreement with the applicant that its impact would be 'Major Adverse'</p> <p>The loss of the station will also impact on the below heritage assets.</p>

			<p>Heath House, Heath House as the former Station Masters house, was built in tandem with and for the former station. A such it has a substantial relationship with the former station and railway line. Although there is no direct impact to the Locally Listed building, the loss of the former station will detrimentally impact upon this important relationship and also its setting. The impact is therefore considered to be 'minor adverse'</p> <p>Stamford to Wansford Railway Line, It should be noted that the line is considered a non-designated heritage asset in its own right and is in the process of being placed on the Local List. Although the railway line has been decommissioned, its earthworks are still visible along its entire route and with the exception of one small section is traversable. Two of its three stations have been retained (one being Wansford Road), albeit both converted to residential. It also has two significant bridges, one at Wansford Road and other at Ufford which are both considered heritage assets within their own right. The bridge at Ufford is in the process of being put on the Local List.</p> <p>The loss of one of the two remaining stations is considered detrimental to the significance of the line. The retention of Heath House, parts of the platform and some of the peripheral buildings will retain some impression of the former station site however this will be substantially diminished by the loss of the station but also the construction of the road over the former site. Overall the impact of the loss of the Wansford Road Railway Station on the former railway lie is considered to be 'moderate adverse'</p> <p>A47 Bridge, This is utilitarian structure whose significance is tied to the railway line, its construction and its use as a crossing by on the historic Leicester to</p>
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			<p>Peterborough Road. It does form part of a group of railway assets however it does not have a strong relationship with the former station beyond forming part of a group. The loss of the station and no longer being the principal crossing for the A47 will impact upon the significance of the asset, with the impact considered to be 'minor adverse'</p> <p>g) If the Station is demolished, PCC would expect the pillars to either be retained and incorporated somehow within the existing line/location or moved to a sustainable related railways setting. If the station is relocated, the related railway setting should be with the station</p>
1.4.24	PCC	<p>Assessment Table 5 in Appendix 6.1 (Cultural heritage information) [APP-085] sets out the Applicant's assessment of impacts prior to mitigation.</p> <p>a) Do the IPs agree with the Applicant's assessment of impacts as set out in this Table?</p> <p>b) If not, could the IP please set out their view, giving a reasoned explanation for the view that they hold?</p>	<p>a) No. Although the scheme will have a negligible impact on the setting of the non-designated heritage assets of archaeological interest, groundwork associated with the scheme will have an adverse physical impact which could potentially lead to total loss of significance.</p> <p>b) Therefore, direct physical impact on non-designated heritage assets of archaeological interest should be reassessed taking the following points into consideration:</p> <ul style="list-style-type: none"> - Value/Sensitivity of non-designated heritage assets to be directly impacted upon by the scheme should be reassessed as 'local/regional significance' does not necessarily equate to 'low' value/sensitivity - Magnitude of Impact and Significance (of Effect(s)) do not correlate in the table. A 'Major Adverse' magnitude of impact is unlikely to have only a 'Slight Adverse' significance in terms of effect (s).

			<p>Built Environment:</p> <p>a) No. As section 1.4.20 above</p> <p>There is agreement that the initial impact of the proposal is 'Major Adverse' but there is disagreement that the proposed mitigation reduces this to 'Moderate Adverse'. The recording of a heritage asset does not reduce the impact of its demolition on its significance. Recording as per NPPF 205 is required where there is a loss of significance however whether recording can or cannot be implemented is not a factor in considering whether the proposals are acceptable. The only mitigation that could reduce the harm is its relocation. Although this is being considered, and there is no reason at this stage to suggest that it won't be relocated, it does not at this stage form part of the proposals. There is therefore disagreement that the mitigation proposed would reduce the impact from major adverse to moderate adverse. The retention of other elements are considered separate heritage assets to the former station and their retention should not be included within the benefit of Locally Listed station.</p>
1.4.25	PCC	<p>Recording of heritage assets</p> <p>Do PCC and HMBCE agree that the methods of recording heritage assets when there are interventions/demolition as set out in Section 8.3 of Chapter 8 of the ES [APP-046] are appropriate?</p>	<p>Section 8.3 of Chapter 8 of the ES does not refer to methods of recording heritage assets.</p> <p>There is agreement regarding the framework however as no specific details have been submitted PCC can't advise on this.</p>
1.5	Cumulative and cross-cutting effects		

1.5.2	PCC	Assessment with other projects a) Do the Councils consider that the Long List screening set out in Appendix 15.1 [APP-0134] is comprehensive and includes all 'other developments'? b) If not, could they please supply details and why they consider that such proposals should be considered in line with the criteria set out in the Planning Inspectorate's Advice Note Seventeen: Cumulative effects assessment relevant to nationally significant infrastructure projects.	PCC agree the list is comprehensive and includes all other developments.
1.5.6.	IPs	Relationship of Effect on Scheduled Monument, SSSI, veteran tree T20 and Flood Compensation Do IPs consider that the Applicant has struck the appropriate balance between requiring more land for compulsory acquisition through requiring more land for flood compensation when compared to the direct effects on the scheduled monument, the 1.5.6 veteran tree T20, the Sutton Heath and Bog SSSI and any other matter.	
1.6	Draft Development Consent Order (dDCO) [AS-010] & Explanatory Memorandum (EM) [APP-017]		
1.6.5	PCC	Article 2 – Definitions and Schedule 2 – Requirement 1 The Planning Inspectorate's Advice Note 15, paragraph 19.1 states that Requirements should generally be drafted to identify the relevant planning authority or authorities by name. The relevant provisions in this dDCO have been drafted in that way (see draft EM 4.27.4, 4.44, 4.140 and description of requirements at EM 5.5 (c), (f), (g), (i) and (j)). Could PCC confirm whether it is content with the current drafting?	PCC is content with the current drafting.

1.6.6	IPs	<p>Article 2 – Definition of “commence” and Schedule 2 – Requirement 2</p> <p>a) Do any amendments need to be made to the dDCO in light of the judgement of the High Court in Tidal Lagoon (Swansea Bay) PLC v Secretary of State for Business Energy and Industrial Strategy & others [2021] EWHC 3170 (Admin) over the use of the terms “commence” and “begin” (or their derivatives)? The ExA notes, unlike that case, the dDCO does seek to use utilise powers under Section 120 of the PA2008.</p> <p>b) Could the Applicant set out in lay-language what the provisions are intended to deliver; this should be provided in the EM.</p>	
1.6.10	IPs	<p>Article 2 -Definition of “commence”</p> <p>a) The current definition of “commence” excludes operations of archaeological investigations. If this is the case, how is the archaeological investigation and mitigation work to be secured, if it falls outside the point at which the development is commenced and thus the dDCO becomes operative?</p> <p>b) Subject to this resolution, are the IPs content with this drafting?</p>	<p>Archaeological investigations can be undertaken pre-submission to mitigate risk and are secured by approval of a Written Scheme of Investigation (WSI).</p> <p>A WSI may be submitted as part of the planning submission or secured by a pre-commencement condition.</p>
1.6.21	PCC	<p>Article 22 – Protective work to buildings</p> <p>a) Is it possible that the provisions of Article 22 would be used in respect of a listed building?</p> <p>b) If so, should they be the subject of specific provision to ensure that their architectural and historic interest is preserved?</p>	<p>a) No. The article 22 does not give permission for listed building consent</p> <p>b) Regardless of the above, as there are statutory protections for Listed Buildings, any protections should form part of a specific provisions to ensure other non-relevant factors are not taken in to consideration.</p>
1.6.28	PCC	<p>Article 47 – Appeals relating to the Control of Pollution Act 1974 Article 47 of the dDCO addresses Appeals relating to the Control of Pollution Act 1974</p>	<p>The current appeals process for COPA 1974 S60 Notices or S61 Consents for COPA 1974 Act is considered tried and tested.</p>

		<p>(CPA1974) and seeks to introduce an appeals mechanism for:</p> <ul style="list-style-type: none"> • notices to control noise on construction sites served by the local health/ environmental protection authority (ie PCC) under s60 of the CPA1974; and • consents prior to the commencement of construction works issued by PCC under s61 of the CPA1974. <p>The Applicant has not sought to disapply the initial consenting process under s61 and bring it within the terms of any made DCO. It would therefore only be the decision to refuse a consent or grant a conditional consent that would be governed by any made DCO.</p> <p>As far as s61 is concerned, if the initial consenting mechanism is not being brought within any made DCO, could the Applicant please explain how making an appeal against refusals of consent or conditions imposed on consents should become part of the NSIP regime. The EM provides very little justification for Article 47's inclusion in any made DCO.</p> <p>a) Could the Applicant please provide any such precedents?</p> <p>b) Could the Applicant please further justify this provision?</p> <p>c) If time savings are cited as part of an answer, then flow charts with estimated timings should be provided.</p> <p>d) Does any local authority which may make a determination in this regard have any comments to make on this provision?</p>	
1.6.40	PCC	Schedule 2 – General	PCC content with consultation prior to discharge of requirements.

		<p>Could PCC, NE, EA and HMBCE please check Schedule 2 and confirm whether they are content as regarding consultations prior to discharge of Requirements?</p> <p>If they consider that they should be additionally included or excluded from any particular Requirement could they please explain why they believe that to be appropriate?</p>	
1.6.46	PCC	<p>Schedule 2 – Requirement 8</p> <p>Should these matters also be subject to consultation with the EA and LLFA?</p>	Yes, consultation should be undertaken with the EA and LLFA.
1.7	Geology and Soils		
1.7.1	IPs	<p>Agricultural Land Classification</p> <p>a) Paragraph 9.5.6 of Chapter 9 of the ES [APP-047] indicates that two areas have not been surveyed for their Agricultural Land Classification. Does the Applicant intend to survey these areas?</p> <p>b) Do IPs consider that the Applicant's assessment of Grade 3a is reasonable?</p> <p>c) If not, please explain your reasoning.</p>	The assessment of Grade 3a is reasonable.
1.7.3	PCC	<p>Agricultural Land Assessment</p> <p>a) Given that the PCC area is relatively small, should the assessment be considered against other geographic area(s)?</p> <p>b) If so, could IPs please set out the area which should be considered, explaining why?</p>	This is not considered to be necessary. The site is within the PCC boundary.
1.7.9	IPs	<p>Baseline for geology and soils</p> <p>a) Paragraph 9.7.49 of Chapter 9 of the ES [APP-047] indicates the Construction year baseline is based on information in the Peterborough Local Plan. Given the proximity to administrative</p>	No comment

		<p>boundaries, could the Applicant please set out why it did not consider cross-boundary implications?</p> <p>b) Do IPs consider the Applicant's approach to be correct?</p> <p>c) If not, what area should be considered?</p> <p>d) Can the Applicant please provide outline versions of the Soils Management Plan, a Soils Handling Strategy and a Materials Management Plan so that the proposed mitigation and their potential efficacy on ensuring best practice measures for soil handling can be fully understood.</p>	
1.8	Landscape and Visual		
1.8.1	PCC	<p>Valued Landscape</p> <p>a) Do any of the Councils consider that any part of either the Order Lands or land within the Zone of Theoretical Visibility represents a Valued Landscape for the purposes of paragraph 174 of the NPPF?</p> <p>b) If so, could the Council please set out on a plan the area(s) concerned and explain why it holds that the land in question represents a valued landscape?</p>	<p>The Proposed Scheme is within the National Character Area (NCA) 89 'Northamptonshire Vales' and 92 'Rockingham Forest'. It is located in Local Character Area (LCA) 2 'Nassaburgh Limestone Plateau' with the western extents of the Proposed Scheme in LCA2 Sub-Area b 'Burgley and Walcot Slopes' (Sub-Area a 'Castor Hanglands Wooded Plateau' skirts just north). It also spans LCA 1 'Nene Valley' Sub-Area C 'Ailsworth and Castor Valley Slopes'.</p> <p>It is not considered that the Order Lands or land within the ZTV represents a Valued Landscape for the purposes of para 174 of the NPPF.</p>
1.8.4	IPs	<p>Assessment</p> <p>a) Do any IPs consider that the lack of visits to private property to be a limitation of significance within the assessment?</p> <p>b) If so, could they please identify the precise location, along with details of features that could not</p>	<p>PCC to not consider this to be a limitation of significance within the assessment</p>

		be otherwise seen from publicly accessible viewpoints?	
1.8.7	IPs	Effect on Rockingham Forest and the Northern Wolds a) Do IPs, in particular HDC and NNC, agree that the Proposed Development would not have a significant adverse effect on either the Rockingham Forest or the Northern Wolds landscape character areas? b) If not, please explain why you consider this to be the case, providing information to support your view and specifying particular locations as appropriate.	Agree
1.8.8	IPs	Visual Receptors a) Do IPs consider that the list of visual receptors set out allows for a full consideration of the likely significant effects of the Proposed Development. b) If not, please explain why you consider this to be the case, providing information to support your view and specifying particular locations, preferably shown on a map to an Ordnance Survey base, as appropriate.	The list allows for full consideration of the likely significant effects of the proposed development.
1.8.9	IPs	Landscape character a) Do IPs consider that the Applicant's assessment of the value of the two identified landscape character areas set out in paragraph 7.7.11 of Chapter 7 of the ES [APP-045] is correct? b) If not, please explain why you take that view.	PCC do not disagree.
1.8.16	PCC	Vegetation Growth rates Do PCC, HDC and NNC agree with the assumptions for growth of vegetation set out in Table 7-6 in Chapter 7 of the ES [APP-045]?	PCC agree in principle with the assumptions for growth of vegetation. However this is dependent on optimum growth conditions as well as aftercare and maintenance.
1.9	Noise and Vibration		
1.9.2	PCC	Base consideration a) Do IPs consider that the LOAEL and SOAEL figures set out in paragraph 11.4.15 are appropriate?	The LOAEL and SOAEL figures at each location have been determined using DMRB LA 111, which

		b) If not, please explain why and how you take that view and set out what they should be.	references BS 5228-1 Section E3.2 and Table E.1 (the 'ABC Method'), an acceptable method.
1.9.5	PCC	Road surfacing Paragraph 2.5.38 of Chapter 2 of the ES [AS-013] gives two potential road surfaces, Thin Surface Course System and Hot Rolled Asphalt. a) Could the Applicant please set out the differences in noise levels expected with these two surfaces? b) Could PCC confirm whether or not it generally uses Hot Rolled Asphalt for roads which it maintains, and if not, what surfacing is used (along with details of the noise profile expected).	HRA is a noisy material because of its positive texture. It is also a more complicated material to lay with the pre-coated chippings etc. TSM is essentially a proprietary BBA HAPAS approved material similar to CASC or CASC plus. I would suggest either a TSM or CASC+ (negative textured material) will be a better surface course product for road noise and durability.
1.10	Socio-economic effects		
1.10.4	PCC	Construction and Demolition Waste a) Do IPs consider that the wastage rate of 5% as set out by the Applicant in paragraph 10.10.4 of Chapter 10 of the ES [APP-048] is reasonable? b) If not, what should it be? Such a rate should be justified.	The ES asserts that the wastage rate is based on the recovery rates set out in the WRAP guidance document Achieving good practise Waste Minimisation and Management; this would appear to be reasonable
1.10.7	IPs	WCH Surveys a) Could the Applicant please explain why no WCH surveys were undertaken to the north of the existing A47? b) Do IPs have any information that they feel is relevant to the consideration of the effects of the Proposed Development of these highway users in this area?	
1.10.17	PCC	Old Station House Could the Applicant and PCC provide dates (first occupation and last occupation) when the Old Station House was occupied as a dwelling?	There is no planning history as to when the property was first occupied as a dwelling. There is evidence that the property has been occupied as residential however, the property is currently vacant.

			According to PCC Local Taxation, Council Tax was last paid on 31/12/2021.
1.10.20	PCC	6, 8, 10 and 12 Great North Road, Thornhaugh a) Could the Applicant please supply, measured on the basis of Ordnance Survey records, the extent of each residential garden of these properties currently and after the Proposed Development both graphically and in square metres. b) Does PCC have any adopted standards for the size of gardens which may be applicable to the consideration of this matter?	PCC does not have any adopted standards for the size of gardens.
1.10.23	IPs	Human Health effects a) Chapter 12 of the ES [AS-016] paragraph 12.4.37 indicates that DMRB LA 112 does not define the significance of human health effects. Are IPs satisfied with the assessment methodology for human health effects as set out in the ES? b) If not, could you please set out what methodology should be used, justifying your answer.	PCC is satisfied with the assessment methodology.
1.11	Traffic and Transport		
1.11.1	PCC	Traffic Model a) Do the Councils agree that the use of the South East Regional Transport Model (SERTM) for traffic modelling is appropriate in all the circumstances of the proposal? b) If not, what other model or geographic area should be utilised?	It is understood that the model for the scheme WTM (Wansford Transport Model) does not specifically use the SERTM model as built. It has been derived by using mobile phone data from SERTM along with data from the Peterborough Transport Model (PTM), surveys from the Trafficmaster database and further Turning count and link count surveys. This is considered to be an acceptable approach at a scheme-wide level. However it is unclear from the assessment whether the model has been validated at individual junction level and if not, whether further analysis is proposed in this respect.

1.11.2	PCC	<p>WCH surveys</p> <p>a) Paragraph 5.125 of the TA indicates the location for WCH surveys. Was there a particular reason why no surveys were undertaken at the junction of:</p> <p>(i) Sutton Heath Road with the A47;</p> <p>(ii) The Drift with the A47; and</p> <p>(iii) the junction of Wansford 4 with the A47; in relation to crossing of the A47 by WCHs.</p> <p>b) Do IPs have any information as to the extent of use of these junctions by WCHs.</p> <p>c) Paragraph 5.1.28 indicates that the survey period included a Bank Holiday. Does any party consider this effects way the consideration of the results and, if they do, could they explain why they take the view?</p>	<p>It is understood that the location of the WCH surveys were informed by the current network of permissive cycleways shown on the extract from the Peterborough rural cycleways map (Figure 5-6 in the Transport Assessment). It is possible that WCH movements may have been picked up in the turning counts carried out in the locations queried under subsection a) and b) although this is not made clear in the assessment so clarification on this point should be sought. Turning to point c) it is noted that the surveys were carried out in a period that contained a Bank Holiday. This is not considered to be an issue as more leisure trips may have been captured which will give a robust assessment.</p>
1.12	Water Environment and Flood risk		
1.12.4	PCC	<p>Assessment criteria</p> <p>a) Paragraph 13.4.9 of Chapter 13 of the ES [AS-017] indicates that the two way flow is below the HEWRAT assessment criteria. Are there any other similar criteria relating to roads with lesser flows against which potential pollution effects of the Proposed Development should have been assessed?</p> <p>b) If so, what are they and why are they applicable/ non-applicable?</p>	<p>(a) and (b) – There is the Simple Index Approach as set out in Chapter 26 of the CIRIA SuDS Manual (C753). However this is less applicable to a scheme of this size. The HEWRAT standards were developed in discussion with other bodies such as the EA and is therefore suitably applicable for the major highways schemes. It should be noted that the HEWRAT assessment is used on many other major infrastructure schemes across the UK.</p>
1.12.5	PCC	<p>Assessment assumptions</p> <p>a) Do the IPs, and particularly the EA and PCC, agree with the Applicant's</p>	<p>(a) and (b) – It is noted that further investigation will likely be required to investigate any below ground structures. The LLFA has also requested that further ground investigations to be undertaken where</p>

		<p>assessment, set out in paragraphs 13.5.5 and 13.5.6 of Chapter 13 of the ES [AS-017] that there is sufficient information to allow for a proper assessment in relation to the hydraulic properties and groundwater level ranges?</p> <p>b) If not, could you explain why you hold that view, and what additional information is necessary?</p>	<p>necessary, which this would fall under. Therefore, we have no further comments to make on this point at this time.</p>
1.12.7	PCC	<p>Hydraulic modelling Paragraph 13.7.63 of Chapter 13 of the ES [AS-017] indicates that Hydraulic modelling of the A1 Mill Stream culvert was undertaken using HY-8 v7.6 (Federal Highway Administration, 2020). It is stated in the Flood Risk Assessment [APP-128] that this was agreed with PCC.</p> <p>Can the Applicant and PCC explain why they believe that this model is appropriate for hydraulic modelling of this crossing and what implications it has for the hydraulic modelling of Wittering Brook.</p>	<p>PCC is not able to comment on this. It is not known if this was discussed with the LLFA or Highways.</p>
1.12.16	PCC	<p>Drainage Maintenance Paragraph 4.6.1 of the Drainage Strategy Report [APP-129] indicates that PCC and the owners of Sacrewell Farm would be maintaining the drainage for the majority of the side roads. Could PCC and the William Scott Abbott Trust confirm that they are content with this arrangement.</p>	<p>The A47 project will see various adjustments to side roads and thus the extent of public highway that PCC will be responsible for at multiple locations along the A47. In these locations the Local Highways Authority (LHA) is agreeable to the maintenance of basic road drainage assets resulting from the project with any non-standard drainage systems or arrangements, such as connections into attenuation basins, to be agreed with Highways England. It is the LHA's understanding that where new roads and drainage are required it will</p>

			be provided by the project and will be subject to technical review by the Councils technical team.
1.12.22	PCC	<p>Climate Change Allowances It has been noted that the Applicant has utilised different allowances for climate change within the design. For example, in paragraph 13.9.32 of Chapter 13 of the ES [AS-017], different climate change allowances are used where existing drainage is being adapted and where carriageway widening or realignment occurs, and further different allowances in paragraph 13.9.34 for the sizing of the Wittering Brook watercourse culvert, and in paragraph 13.9.36 for the size of compensatory floodplain volume.</p> <p>a) Do the EA and PCC as LLFA consider that this approach is appropriate?</p> <p>b) If not, what approach should be followed, providing information to support the allowance(s) of climate change advocated? Does the Applicant have any comments to make as to why different allowances have been utilised?</p> <p>d) Does the publication by the EA on 20 July 2021 (and since updated) of revised climate change allowances in Flood Risk Assessments for peak fluvial flow rates and future peak rainfall intensity have any implications for this matter?</p>	<p>The difference between the climate change allowances is related to the fluvial modelling, compared to the levels of climate change when calculating the required attenuation of proposed surface water structures. For example, an existing or proposed watercourse fluvial flow would be modelled using the 35% and 65% climate change allowances as set out in paragraph 13.9.34 and 13.9.35 of Chapter 13 of the ES, whereas the attenuation requirements of surface water management features is designed with a 40% allowance on climate change, as set out in paragraph 13.9.32. The difference being one is looking at the fluvial levels, while the other is rainfall intensity. Therefore, this approach is acceptable to the LLFA.</p>
1.12.28	PCC	<p>Draft Anglian River Basin Management Plan a) Does the Draft Anglian River Basin Management Plan published by the Environment Agency have any implications for the consideration of this Proposed Development? b) If so, how should this be considered?</p>	PCC Drainage Team have not commented

1.12.29	PCC	Draft Flood Risk Management Plan for Anglian River Basin a) Does the Draft Flood Risk Management Plan for Anglian River Basin published by the Environment Agency have any implications for the consideration of this Proposed Development? b) If so, how should this be considered?	PCC Drainage Team have not commented
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