

LOCAL IMPACT REPORT - PETERBOROUGH CITY COUNCIL

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

PLANNING INSPECTORATE REF: TR010039

Deadline 2 – 15th February 2022

1. Introduction

This Local Impact Report (LIR) has been prepared by Peterborough City Council (PCC) in accordance with the advice and requirements set out in the Planning Act 2008 (as amended). The sole definition of an LIR is given in s60(3) as, ‘a report in writing giving details of the likely impact of the proposed development on the authority’s area (or any part of that area)’. This provides a means for Local Planning Authorities to present knowledge and evidence of local issues in a full and robust report to the Examining Authority. This report is based on the existing local knowledge of Council Officers.

The content of the LIR is a matter for the local authority concerned as long as it falls within this statutory definition.

In preparing this LIR the local authority has had regard to the DCLG’s Guidance for the examination of applications for development consent (2015) and the Planning Inspectorate’s Advice Note One, Local Impact Reports (2012).

In producing a LIR, the local authority is not required to carry out its own consultation with the community as parish councils, organisations and members of the public are able to make representations directly to the Planning Inspectorate as “interested parties” so that their comments about the scheme will be considered by the Examining Authority. Therefore the views of local interest groups have not been sought specifically for the purposes of this report.

2. Peterborough Context

Peterborough is a unitary authority located in the East of England, approximately 125 kilometres (80 miles) north of London. It comprises the City of Peterborough itself, and 25 villages set in countryside extending over an area of approximately 344 square kilometres. The area borders the local authorities of Fenland, Huntingdonshire, East Northamptonshire, Rutland, South Kesteven and South Holland.

Peterborough is situated on the very edge of the Fens. To the east of the City, the fenland landscape is flat and open, with the villages of Eye and Thorney on islands of higher ground and a settlement pattern of dispersed hamlets and farms. To the west and north, the shallow river valleys of the Nene and Welland give way to an undulating limestone plateau, with a denser pattern of attractive stone villages. Historic houses and their grounds, like Burghley and Milton, feature prominently in the landscape, as does the RAF base at Wittering, beside the A1 towards the western edge of the area.

There is a long history of settlement in Peterborough, with evidence from the Bronze Age remains at Flag Fen. The Norman Cathedral still stands at the heart of the modern city.

Peterborough is an important regional centre, providing employment, shopping, health, education and leisure facilities for people across a wide catchment area.

In addition to its important built heritage, the area contains a rich biological diversity. There are two Special Areas of Conservation (Orton Pit and Barnack Hills & Holes); part of a Special Protection Area

and Ramsar site (Nene Washes); three National Nature Reserves (Castor Hanglands, Bedford Purlieus and Barnack Hills & Holes); five Local Nature Reserves; and a large number of Sites of Special Scientific Interest and other County Wildlife Sites.

Peterborough has a diverse economy, ranging from innovative small business to large global headquarters.

Peterborough is situated in a prime location beside the (north-south) A1 and (east-west) A47. The City of Peterborough continues to grow with urban extensions at Hampton and Cardea and the urban extension at Great Haddon.

3. Details of the proposal

In summary the scheme proposes the following key elements:

- Approximately 2.6km of the section of the A47 between the Wansford junction with the A1 and the Nene Way roundabout near Sutton is to be upgraded to dual-carriageway standard, including the construction of two new underpasses.
- a new free-flow link road connecting the existing A1 southbound carriageway to the new A47 eastbound carriageway.
- a new link road from the Wansford eastern roundabout to provide access to Sacrewell Farm, the petrol filling station and the Anglian Water pumping station.
- closure of the existing access to Sacrewell Farm with a new underpass connecting to the farm from the link road provided.
- a new slip road from the new A47 westbound carriageway also providing access to the petrol filling station.
- a link road from the new A47 Sutton Heath roundabout, linking into Sutton Heath Road and Langley Bush Road.
- new junction amendments for access to Sutton Heath Road and Langley Bush Road.
- closure of the existing access to the A47 from Sutton Heath Road, Sutton Drift and Upton road
- new passing places and limited widening along Upton Drift Road (also referenced as Main Road)
- a new walking and cycling route connecting Wansford to Sutton. This includes a new underpass at the disused railway to connect to Sutton Heath Road.
- new safer access to the properties on the A1, north of Windgate Way .

4. Relevant Development Proposals

There are no other planning applications or other proposals in the district which are directly relevant to the proposal.

5. Policy Framework

The following policies of the adopted Peterborough Local Plan (2019) are considered to be of relevance:

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 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

Policy LP29: Trees and Woodland

Policy LP32: Flood and Water Management

Policy LP33: Development on Land Affected by Contamination

6. Traffic and transport

The principle of the proposed scheme is supported. The 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.

The population of Peterborough has grown considerably over recent years and we are one of the UK's top cities for population growth, making us one of the UK's fastest growing cities.

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.

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 the applicant has 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.

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.

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.

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.

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.

The existing bridges on the public right of way from Sutton to Wansford should be replaced/upgraded to accommodate increased use of the routes.

7. Cultural Heritage

Policy LP19 (The Historic Environment) of the adopted Peterborough Local Plan advises that development should protect, conserve and enhance where appropriate the local character and distinctiveness of the area particularly in areas of high heritage value.

Unless it is explicitly demonstrated that a proposal meets the tests of the NPPF permission will only be granted for development affecting a designated heritage asset where the impact would not lead to substantial loss or harm. Where a proposal would result in less than substantial harm this harm will be weighed against the public benefit.

In the case of application sites which include, or could potentially include, heritage assets with archaeological interest, designated or non-designated, the council will require the developer to carry out a preliminary desk-based assessment. If this does not provide sufficient information, developers will be required to undertake a programme of field evaluations.

Archaeology

The applicant has submitted a Heritage Statement as part of the ES (APP-044). The assessment has considered effects on designated and non-designated heritage assets.

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.*

There are no major concerns in principle with the proposed scheme. However, the route entails the destruction of part of the southernmost portion of the Scheduled Monument. In consultation with Historic England, a programme of strip-map-record must be implemented in accordance with an approved WSI.

The programme of archaeological work has not been completed, namely targeted area excavations, including the area of the SM which will be obliterated. As it stands, based on the available evidence, it is difficult to assess significance with a reasonable degree of confidence.

In addition, the results of the archaeological fieldwork have not been included in the heritage assessment, despite claims that these have been considered. As a result, the passement simply lists a series of entries in the Historic Environment Record (HER). The problem stems from the definition of 'non-designated heritage assets' which is still surrounded by controversy. Historic England is looking into it. Regardless of the definition, for the sake of consistency, the results of the geophysical survey and trial trenching should have been integrated to make the Zoning more meaningfully.

There are outstanding areas of the revised route and there are now Zones which have not been investigated.

Built Environment

The Chapter 7 [APP-044] of the Environmental Statement 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.

Mile Marker

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 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.

Conservation Areas

There are four Conservation Areas which are within close proximity of the proposed site, Ailsworth, Sutton, 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.

Thornhaugh Conservation Area

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.

Wansford Conservation Area

No assessment of the impact upon the setting of the Wansford Conservation Area has been undertaken. Whilst no works are to be carried out within the boundary of the Conservation Area, substantive alterations will be 100m away.

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.

Sutton Conservation Area

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 stop the active usage of The Drift, the historic main access.

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.

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.

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 are not considered materially detrimental.

Model Farmhouse

The proposals do not materially impact the setting of the Grade II Listed building. 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. The mitigation measure of a structural survey and a construction risk assessment as has been suggested are considered prudent and reasonable.

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.

Railway Buildings

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 favor of the retention in situ and viable for future use of Locally Listed Heritage Assets. The existing building is considered viable with no identified structural deficiencies identified and as such there is a principle objection to this proposal.

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.

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.

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.

8. Biodiversity

Policy LP22 (Green Infrastructure Network) advises that the Council will seek to maintain and improve the existing green infrastructure network in Peterborough. This will be achieved by enhancing, creating and managing multi-functional green infrastructure, within and around settlements, that are well connected to each other and the wider countryside, and which reflect the broad strategic framework set out in the Green Infrastructure and Biodiversity SPD.

Strategic and major development proposals should incorporate opportunities for green infrastructure provision, to reverse the decline in biodiversity and restore ecological networks at a landscape scale, reverse habitat fragmentation and increase connectivity of habitats, and to preserve, restore and create priority and other habitats within and adjacent to development schemes.

Proposals will be expected to provide clear arrangements for long term maintenance and management. Development must protect existing linear features of the green infrastructure network. Proposals which would cause harm will not be permitted unless the need for and benefits of the development demonstrably outweigh any adverse impacts.

Policy LP28 (Biodiversity and Geological Conservation) advises:

Part 1: Designated Site

International Sites- The highest level of protection will be afforded to these sites. Proposals which would have an adverse impact on the integrity of such areas and which cannot be avoided or adequately mitigated will only be permitted in exceptional circumstances where there are no suitable alternatives, overriding public interest and subject to appropriate compensation.

National Sites- Proposals within or outside a SSSI likely to have an adverse effect will not normally be permitted unless the benefits outweigh the adverse impacts.

Local Sites- Development likely to have an adverse effect will only be permitted where the need and benefits outweigh the loss.

Habitats and Species of Principal Importance- Development proposals will be considered in the context of the duty to promote and protect species and habitats. Development which would have an adverse impact will only be permitted where the need and benefit clearly outweigh the impact. Appropriate mitigation or compensation will be required.

Part 2: Habitats and Geodiversity in Development

All proposals should conserve and enhance avoiding a negative impact on biodiversity and geodiversity.

Part 3: Mitigation of Potential Adverse Impacts of Development

Development should avoid adverse impact as the first principle. Where such impacts are unavoidable they must be adequately and appropriately mitigated. Compensation will be required as a last resort.

Chapter 6 [APP-046] of the Environmental Statement 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.

The proposed mitigation and compensation is sufficient for the proposed work for the Council's material concerns to be discounted. Points of clarification on mitigation and compensation are requested.

Tables 8-11, 8-12, 8-13 and 8-14 within the ES detail the compensation and mitigation required over the construction and operational phase of the development.

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 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.

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.

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 potential Invasive Non-Native Species found on site should be included within any tool box talked performed on site.

Whilst the scheme will have impacts on biodiversity and habitats, subject to further clarification on the proposed mitigation and compensation the proposal would comply with policies LP22 and LP28 of the adopted Peterborough Local Plan.

9. Air Quality

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.

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.

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.

10. Noise and Vibration

Noise and Vibration is reported in Chapter 11 of the ES [APP-049]. There is no objection to the proposed scheme in terms of noise subject to 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. Best practicable means for noise and vibration mitigation should be employed in conjunction with 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.

Best Practicable Means should also be used for all overnight lighting requirements and for the control of dust during construction.

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 finalised. This will be particularly important for night-time works once the scope and duration of such works have been defined.

Further Detailed Construction Noise/Vibration Assessments to include:

- 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 methods are refined and proposals for night-time work discussed and agreed with the environmental health department at the Local Authority.
- 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.
- Sufficient detail on plant types, duration, and location

Construction Noise:

- 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-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.
- 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.
- 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.

Construction Traffic:

- 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.

Diversion routes:

- 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.

Operational Noise:

- The assessment of operational noise includes 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.

Vibration:

- 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.

Communication:

The potential effects of construction noise and vibration on 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.

11. Landscape and Visual Effects

LP24 (Nene Valley) advises that within the Nene Valley area the council will support development that will safeguard and enhance recreation and/or bring landscape, nature conservation, heritage, cultural or amenity benefits. The proposal would need to be appropriate in terms of use, scale and character. Development which would increase flood risk or compromise the performance of flood defences will not be permitted.

Policy LP27 (Landscape Character) advises that new development in and adjoining the countryside should be located and designed in a way that is sensitive to its landscaping setting, retaining and enhancing the landscape character.

Policy LP29 (Trees and Woodland) advises that proposals should be prepared based upon the overriding principle that existing tree and woodland cover is maintained. Opportunities for expanding woodland should be actively considered.

Proposals which would result in the loss or deterioration of ancient woodland and or the loss of veteran trees will be refused unless there are exceptional benefits which outweigh the loss. Where a proposal would result in the loss or deterioration of a tree covered by a Tree Preservation Order permission will be refused unless there is no net loss of amenity value or the need for and benefits of the development outweigh the loss. Where appropriate mitigation planting will be required.

The applicant has also submitted a Landscape Visual Impact Assessment [APP-045] which concludes that by year 15 of operation, with the establishment of Proposed Scheme landscape mitigation, effects on landscape character would be slight adverse (not significant) on both the Nene Valley and Nassaburgh Limestone Plateau.

By year 15 of operation the establishment of Proposed Scheme planting would contribute to screening and landscape integration and there would be no residual significant visual effects.

The assessment concludes that overall, combining both landscape and visual effects, the Proposed Scheme would not, overall, result in a significant long term residual effect on overall landscape and visual amenity. It is acknowledged that a small number of visual receptors would experience a residual adverse (albeit not significant) visual effect, however in the context of the overall Proposed Scheme this would be a relatively limited change.

The detail within the Arboricultural Impact Assessment (AIA) 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.

Tree T.18 should be retained.

Tree replacement numbers within the planting proposals to include additional mitigation planting numbers for direct loss of Category A & B trees to comply with the Council's Local Plan Policy LP29.

PCC has no objection in principle however wishes to reserve its position at this stage pending further progress of the examination and discussions with the Applicant.

PCC considers that with appropriate mitigation, following the principles set out in the environmental masterplan the landscape impacts can be adequately mitigated.

12. Drainage

Policy LP32 (Flood and Water Management) advises that proposals should adopt a sequential approach to flood risk management in line with the NPPF and council's Flood and Water Management SPD. Sustainable drainage systems should be used where appropriate. Development proposals should also protect the water environment.

Chapter 13 - Road Drainage and Water Environment of the ES [APP-051] reports the potential significant effects for the road drainage and the water environment as a result of the Proposed Scheme. This assessment includes a review of the existing baseline conditions, consideration of the potential impacts and identification of proportionate mitigation and enhancement.

PCC has no concerns in principle with the proposed surface water drainage strategy for the proposed scheme. However, further information is required including:

- 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;
 - 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.
 - A phasing plan, including a timeline for its implementation.
 - 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.

- The details of any further ground investigation.

- A full and up to date surface water drainage strategy for the operational scheme, which

includes but is not limited to the following:

- 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 routes;
- 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.

PCC raise no issues in respect of policy LP32 subject to the lead local flood authority being satisfied through the examination process. PCC welcome further discussion with the applicant and consultation with regards to further iterations of the drainage scheme/EMP.

13. Consideration of the draft order

With regards to the Draft Development Consent Order, PCC in general terms does not wish to raise any concerns, however the Council wishes to reserve its position at this stage pending further progress of the examination and discussions with the Applicant.

14. Conclusions

Peterborough City Council remains supportive of the A47 Wansford to Sutton dualling scheme. The scheme will support economic growth, improve journey times, improve safety, provide capacity for future growth and provide a safer route between the communities for walking, cycling horse-riding and other road users.