

A47 Wansford to Sutton Dualling

Scheme Number: TR010039

Volume 9 **9.19 Applicant's Comments Deadline 3** **Submissions**

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(Examination Procedure) Rules 2010**

A47 Wansford to Sutton
Development Consent Order 202[x]

**9.19 APPLICANT'S COMMENTS ON DEADLINE 3
SUBMISSIONS**

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1 INTRODUCTION

- 1.1.1 The Development Consent Order (DCO) application for the A47 Wansford to Sutton Scheme was submitted on 05 July 2021 and accepted for examination on 02 August 2021.
- 1.1.2 The purpose of this document is to set out National Highways' (the Applicant) Comments on Deadline 3 submissions.

2 SUTTON PARISH COUNCIL (REP3-029) - COMMENTS FOR ISSUE SPECIFIC HEARING 3 -TRAFFIC AND TRANSPORT

	Response	Applicant's Response
1	Sutton Parish Council supports the safety concerns of Upton and the need for improvements to adjacent roads linking to the new dual carriageway. The Upton Road closure means the safety access on adjacent link roads is imperative for the residents and local farm community and should not be left to chance for work to be done by Peterborough City Council.	Please refer to Common Response F of the Applicant's Response to Relevant Representations (REP1-010). Discussions are ongoing with Peterborough City Council (PCC).
2	For safety reasons and to reduce the risk of unsocial behaviour, despite the comments of PCC planning officer, Sutton Parish Council wish The Drift in Sutton to be closed off to through vehicular traffic other than for resident and farm access only. The road would then become a perfect and safe alternative WCHR route.	The northern section of The Drift between the proposed turning head and the existing A47 will become a "Bridleway", as shown on Sheet 6 of the Rights of Way and Access Plans Rev 2 (REP2-004). As such, The Drift will not be a through route for vehicular traffic in the future.
3	We welcome the WCHR provision made adjacent to the new road, under the A1 (with some reservations on the route steepness) and the North/South underpass using the old rail bridge.	The Applicant welcomes the support from Sutton Parish Council for the Walking, Cycling, Horse Riding (WCH) infrastructure to be provided as part of the Scheme. Regarding the steepness of the WCH route under the A1, please refer to the Applicant's Response to the Examining Authority's First Written Questions (REP2-035), response to question 1.11.21, pages 166-167.
4	However, the historic WCHR connectivity between Upton to Sutton, Ailsworth, and Castor is being made a much longer route for all users. We have made representation to NH and Galliford Try for an addition WCHR route under the new dual carriageway in the vicinity of the existing Sutton Roundabout. Nothing is included within the latest publicly available schemes nor have we received any correspondence to our request.	Movement is still enabled for pedestrians, cyclists and horses and the historic context is not obscured, as it is preserved in the historical record. Please refer to Common Response C of the Applicant's Response to Relevant Representations (REP1-010).

3 SUTTON PARISH COUNCIL (REP3-030) - COMMENTS FOR ISSUE SPECIFIC HEARING 2 - ENVIRONMENTAL MATTERS

	Response	Applicant's Response
1	<p>Cultural Heritage-It is of great concern to Sutton residents that the demolition of the Station house and potential site relocation must keep this historically relevant building within the parish.</p> <p>Proposals put forward by a Sutton landowner and resident are being judges against an organisation with a potential location outside the historical context of Sutton Parish. A bias towards keeping it within the parish of Sutton should be a prerequisite and not a bidding situation with an outside organisation as National Highways have done.</p>	<p>Please refer to Applicant's Written Summary of Oral Submissions at Hearings (TR010039/EXAM/9.20) ISH3 items 3.4 – 3.7.</p>

4 SUTTON PARISH COUNCIL (REP3-031) - DEADLINE 3 SUBMISSION

	Response	Applicant's Response
1	Both Sutton and Wansford Parish Councils have been actively engaged in the project since 2017 and should therefore be considered as direct consultees and should have completed Statements of Common Ground.	Please refer to Applicant's Written Summary of Oral Submissions at Hearings (TR010039/EXAM/9.20) ISH4 item 4.3.

5 SUTTON PARISH COUNCIL (REP3-032) - RESPONSES TO THE EXAMINING AUTHORITY'S FIRST WRITTEN QUESTIONS (EXQ1) - ACCEPTED AT THE DISCRETION OF THE EXAMINING AUTHORITY

ExQu	Question to	Question	Comment	Applicant's Response
1.2.2	The Applicant IPs PCC HDC NNC NE EA	<p>Biodiversity, Ecology and Natural Environment Assessment criteria</p> <p>Paragraph 8.4.21 of the ES [AS015] sets out the assessment criteria for biodiversity.</p> <p>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.</p> <p>b) Do IPs agree with the Applicant's approach, or do they consider other geographic areas should be considered?</p> <p>c) If IPs consider other geographic areas should be considered, then could</p>	<p>SPC considers other directly adjacent should be considered. Especially as some of our close neighbouring villages are within other Council regions eg Stibbington under the district council of Huntingdonshire.</p>	<p>Please see Applicant's Response to Examining Authority's First Written Questions (REP2-036) Q1.2.2.</p>

ExQu	Question to	Question	Comment	Applicant's Response
		<p>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	The Applicant 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>	SPC- considers some of the reports our outdated due to rapid climate changes.	Please see Applicant's Response to Examining Authority's First Written Questions (REP2-036) Q1.2.3.

ExQu	Question to	Question	Comment	Applicant's Response
1.4.12	The Applicant	<p>Sutton Conservation Area PCC has indicated that the historic access to the village of Sutton is, effectively, to be removed by the closing of The Drift to most traffic. This would therefore mean that the historic interest of the Sutton Conservation Area was be reduced.</p> <p>Does the Applicant consider that there should be any mitigation for this harm? (Please also see ExQ1.11.15.)</p>	<p>SPC - would like to comment that that The Drift is one of two routes into the village. Historically The Drift was suitable during non motorised vehicle times but as a short straight stint it is used by some almost as a "drag track" especially by antisocial motor cyclists. We believe its closure will have a positive effect for the village whilst maintaining it as residential access and a WCHR route.</p>	<p>Please see Applicant's Response to Examining Authority's First Written Questions (REP2-036) Q1.4.12.</p>
1.4.20	HMBCE PCC IPs The Applicant	<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>SPC- agrees with comments made by PCC and would like to reenforce the fact that land has been made available some 100m from the existing site enabling this village asset to remain within its historical context being dismantled and rebuild.</p>	<p>Please refer to Applicant's Response to Examining Authority's First Written Questions (REP2-036) Q1.4.20.</p>

ExQu	Question to	Question	Comment	Applicant's Response
		<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</p> <p>e) Road Railway Station in all its elements, both individually and cumulatively?</p> <p>f) Could the Applicant please explain what its proposals are for the recording of the asset, and how they would be secured?</p> <p>g) It is suggested by PCC that the Station Building may be dismantled and re-erected in another location. Could the Applicant please</p> <p>h) 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>i) Could the Applicant please explain further its proposals for the gate piers at the station?</p>		
1.5.6	IPs	<p>Relationship of Effect on Scheduled Monument, SSSI, veteran tree T20 and Flood Compensation</p>	<p>SPC believes more could and should have been done at an earlier stage to encroach further into the monument area</p>	<p>Details regarding consultation with Historic England on the Scheduled Monument was provided in Common Response H of the Applicant's Response to Relevant</p>

ExQu	Question to	Question	Comment	Applicant's Response
		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 veteran tree T20, the Sutton Heath and Bog SSSI and any other matter.	that has a field boundary rather than historic asset boundary.	Representations (REP1-010). Please refer to Applicant's Response to Examining Authority's First Written Questions (REP2-036).
1.6.40 A	Parish Councils	<p>Schedule 2 – General</p> <p>a) Do any Parish Councils consider that they should be consulted on any matter regarding the subject of requirements?</p> <p>b) If so, could they please set out precisely which requirement(s) or part of requirement(s) that they feel that they should be consulted upon, and why?</p>	Local Parish councils should be made direct consultees on all matters as we have the best knowledge on the impacts of the proposed design and any future modification. PCC have not consulted us on matters affecting the villages. As an example they want the Drift in Sutton to remain open without giving us chance to share our concerns. We are a Statutory body with elected officials to represent our residents and frankly should be treated as such.	Please refer to Applicant's Written Summary of Oral Submissions at Hearings (TR010039/EXAM/9.20) ISH4 item 4.3.
1.8.4	IPs	<p>Landscape and Visual Assessment</p> <p>a) Do any IPs consider that the lack of visits to private property to be a limitation of significance within the</p>	SPC agrees, some of the early comments and decisions were probably made from a desktop analysis. We spend a significant amount of time encouraging the applicant to	The assessment of landscape and visual effects is set out in ES Chapter 7 (APP-045).

ExQu	Question to	Question	Comment	Applicant's Response
		assessment? b) If so, could they please identify the precise location, along with details of features that could not be otherwise seen from publicly accessible viewpoints?	physically vies some of the areas of our concern. This has improved with the installation of the new NH team.	
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.	SPC would comment that since the hedges between the rail bridge and Scheduled monument have been lowered significant changes to lighting from headlights has been noted along the Nene valley towards Sutton.	The assessment of landscape and visual effects is set out in ES Chapter 7 (APP-045).
1.10.4	PCC NNC CCC HDC IPs	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 [APP048] is reasonable? a) b) If not, what should it be? Such a rate should be justified.	we are not experts but we clearly support an approach where this is kept to an absolute minimum.	This 5% wastage rate is based on worst case 'Good Practice' wastage levels (for the anticipated key construction materials for the scheme) from WRAP (2008) 'Net Waste Tool. It serves as a means to capture the portion of waste that could be generated through the wastage of construction materials. This may be for example waste generated through surplus, out of specification or damaged construction materials. However, through mitigation (such as

ExQu	Question to	Question	Comment	Applicant's Response
				material procurement, delivery, storage and handling managed to minimise the potential for damaged or surplus stock.
1.10.7	The Applicant IPs	<p>WCH Surveys</p> <p>a) Could the Applicant please explain why no WCH surveys were undertaken to the north of the existing A47?</p> <p>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?</p>	<p>SPC believes the proposals to date are a significant improvement but this is a one time opportunity to make a major difference to all WCHR users. More can be done on the steepness of the WCHR A1 underpass and linking of Bridleways from Upton to the Sacrewell Farm WCHR route which is North of the A47.</p>	<p>The WCH facilities to be provided as part of the Scheme are detailed in Section 7.10 of the Transport Assessment (TR010038/APP/7.3 Rev 3).</p> <p>Regarding the steepness of the WCH route under the A1, please refer to the Applicant's Response to the Examining Authority's First Written Questions (REP2-035), response to question 1.11.21, pages 166-167.</p> <p>A number of bridleways are provided across the land between Upton and Sacrewell Farm, namely: sections 1 and 2 of Upton 5; sections 1, 2 and 3 of Sutton 5; sections 1, 2 and 3 of Sutton 5 (permissive); and section 3 of Thornhaugh 8. However, even in combination, these bridleway do not provide a continuous WCH route between Upton and Sacrewell. The Scheme does not impact on any of these bridleways and therefore no improvements are proposed.</p> <p>For information, WCH surveys were undertaken in 2018 at the junction of Sutton Heath Road with bridleway Sutton 5 and permissive bridleway Sutton 5, reference to Site 16 shown on ES Figure 12.3 (TR010039/APP/6.2 Rev X). During the 7-day survey period, only 10 WCH movements in total were recorded bridleway</p>

ExQu	Question to	Question	Comment	Applicant's Response
				Sutton 5 and permissive bridleway Sutton 5. These movements comprised an equal split between pedestrians and cyclists and no equestrian movements were observed.
1.11.2	The Applicant IPs, particularly PCC and Parish Councils	<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;</p> <p>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>The existing A47 from Sutton Roundabout to Wansford is not only dangerous to vehicles but very high risk to impossible to use for cyclists and horse riders hence any movement analysis will only reenforce its negligible usage. We suggested some time ago that residents in the area should be surveyed as to the potential usage if safe routes were made available to get a much better picture.</p>	<p>The Walking, Cycling and Horse Riding Assessment and Review were undertaken in accordance with DMRB standard GG 142 Walking, cycling and horse-riding assessment-and review. In accordance with GG 142, WCH surveys were undertaken to provide an indication of existing usage of the WCH facilities likely to be affected.</p> <p>When identifying the proposed WCH strategy, which both mitigates the adverse impacts of the Scheme and expands the existing networks to reduce community severance and improve accessibility, consideration was given to the latent demand potential by WCH users.</p>

6 WANSFORD PARISH COUNCIL (REP3-033) - COMMENTS ON D2 SUBMISSION BY NATIONAL HIGHWAYS - 7.3 TRANSPORT ASSESSMENT REV 2

	Response	Applicant's Response
1	<p>Wansford Parish Council (WPC) has read with interest Revision 2 of the National Highways Transport Assessment for this scheme. This latest version raises a number of concerns about the data used and the method of calculation of some of the results. This note explains these concerns and why they impact the output from the Transport Assessment.</p> <p>WPC notes that National Highways (NH) continues to refer to Old North Road Wansford as the A6118. This road was reclassified as the C340 in 2017, something that is known to National Highways as they have altered the local road signs. To avoid confusion, WPC refers to this road as Old North Road (ONR).</p>	<p>The Applicant notes the re-classification of Old North Road and the adoption of the acronym ONR.</p>
2	<p>2. Traffic modelling</p> <p>WPC does not have the resources to check the main external inputs to the traffic model but they follow a reasonably consistent pattern with steady traffic growth across the network.</p> <p>The exception to this is the flow shown within Wansford village which show sudden reductions in flows along Old North Road with a halving of traffic between the 2015 base year and the 2025 opening date. It is also noted that in Figure 7-16 the northbound traffic is shown as halving again between the 2040DM case and the 2040DS case. While such a reduction in traffic would be welcomed by the residents, it does not seem plausible.</p> <p>In Section 7.9.6 it is claimed that traffic will leave Old North Road northbound because it “will find more gaps in the flow”. There is no obvious reason why this should be so and it is much more likely because the number of vehicles looking for a gap has been halved in the modelling assumptions.</p>	<p>Please refer to the response to WPC's written representation REP3-033 in the Applicant's Response to the Written Representations (REP3-026). This response details the decrease in traffic flow on Old North Road both in the modelling forecast flows as well as the observed data. It also details the increase in delay at the Wansford Western roundabout. As set out, it is the combination of the growth in strategic traffic, the increase in junction delay and the introduction of the 20mph speed limit which reduces the attractiveness of Old North Road in the forecast year models.</p> <p>As set out in the response to WPC's written representation (REP3-033) in the Applicant's Response to the Written Representations (REP3-026), based on the 2019 observed data there is a two-way count along Peterborough Road of approximately 100 vehicles in the AM and PM peaks. VISSIM model analysis shows a two-way increase of approximately 50 vehicles along Peterborough Road between 2019 to the 2040 DM in the AM and PM peak hours. In broad terms it is not considered that the increase in flow on Peterborough Road in the VISSIM 2040 model is out of proportion with the overall increase in network congestion.</p>

	Response	Applicant's Response
	<p>The reason given for these reductions are the introduction of a 20mph speed limit in the village in 2018 and traffic diverting onto the A1 northbound via Peterborough Road Wansford. As already stated in the WPC Deadline 2 submission, measurements show that the 20mph limit made little or no difference to the traffic flows. As also discussed in the Deadline 2 submission, diverting via Peterborough Road is unlikely as the entry onto the A1 is very dangerous with no acceleration lane. A random survey of residents shows that no one uses this access onto the A1, something that is supported by the very low traffic count numbers.</p> <p>Because one of the traffic flows into the Wansford Western Roundabout appears to be incorrect, the modelling of delays at the roundabout has to be open to question.</p> <p>WPC has raised this issue repeatedly with NH and suggested at the very least they should run a check scenario where traffic levels in Wansford increase in line with all the surrounding traffic. NH has not done this and it brings the whole traffic assessment into question.</p> <p>One of the reasons why modelling is carried out is to allow the easy testing of alternative scenarios if the traffic forecasts are wrong, as they most certainly will be to some extent. NH has only reported on a single modelling scenario, apparently making no attempt to test the robustness of the scheme to changes in traffic flows.</p>	<p>Furthermore, it is not possible to select target growth on individual links and routes as this will disrupt the overall equilibrium of the assigned model. It is considered that the growth on Old North Road, as well as across Wansford village and on the strategic roads (A11 and A47), is commensurate with the projected traffic growth across the model, the calibrated equilibrium assignment and the available roundabout capacity.</p> <p>The results presented in the Transport Assessment (TA) (TR010039/APP/7.3 Rev 3) are derived from the core scenario. As set out in section 6.6.12 of the TA: <i>"The core scenario represents the most unbiased and realistic set of assumptions. It is intended to provide a sound basis for decision-making given current evidence. It must be robust and evidence-based taking on board various factors and noting uncertainties affecting travel demand in the future. In accordance with TAG guidance, the uncertainty log includes the management of the uncertainties required for formulating the core scenario."</i></p> <p>Sensitivity testing is discussed in Section 4 of the Case for Scheme (AS-022). In line with DfT recommendations and uncertainty of forecasting, the future, scenario analysis has been undertaken supplemented with sensitivity tests. In addition to the economic appraisal of the core scenario, additional sensitivity tests of high and low traffic growth have been undertaken.</p>
3	<p>3. Overall Journey Time Assessments</p> <p>The main assessment of journey time savings, the main justification for the scheme, has been described in Section 7.4 of the report. The main figures are in Tables 7-5 to Table 7-9. When these tables are checked, they only consider the journey times from the Wansford eastern roundabout eastwards. They</p>	<p>It should be noted that the economic appraisal uses results from the full model study area. Thus, all impacts at the Wansford western roundabout are included in the economic appraisal. In addition to this, results from the full model 'wider area' assessment are available in Section 7.7 of the TA (TR010039/APP/7.3 Rev 3).</p>

	Response	Applicant's Response
	<p>take no account of delays at the western roundabout even though</p> <p>Section 7.6.13 discusses problems at the western roundabout disrupting the flows on the eastern roundabout.</p> <p>Time savings from the scheme are not useful if they are negated by delays further along the network. Just treating a part of the road in isolation does not give a realistic measure of the economic benefits of a scheme.</p> <p>Once the traffic modelling on the western roundabout has been sorted out, the travel times along the route should be re-calculated to include the western roundabout. It is suggested that the main A47 flows should be timed from a point 500m west of the western roundabout to the Nene Way roundabout and A1 traffic from the start of the slip road to the Nene Way Roundabout.</p>	<p>Overall, the wider network analysis indicates that the Scheme will have a positive impact in terms of improving the operation of the wider network. The wider network statistics are calculated over the entire Wansford simulation area (see: TA TR010039/APP/7.3 Rev 3 Figure 6 1). Therefore, deriving a network wide increase in average speeds of around 1-4%, from the implementation of the Scheme, is considered to represent a sizeable improvement in the overall operation of the network.</p> <p>Furthermore, the journey time routes shown in Figure 7-1 include a pink route labelled: "A47 Wansford western roundabout – Upton/Ailsworth". As shown in Figure 7-1 this journey time route, starts to the west of the junction and therefore includes delays at the Wansford western roundabout. Results for the journey time route can be seen in Table 7-12.</p> <p>As set out in section 7.7, the journey time results along the A47 between the Wansford western roundabout and Ailsworth show a travel time saving of approximately 1 minute 30 seconds in 2025 and 1 minute 45 seconds in 2040 for the eastbound direction during the AM peak, when compared to the Do-Minimum. This represents approximately 17-20% reduction in the total journey time across the route. In the westbound direction along the A47 there is a saving of approximately 1 minute in the 2040 AM peak (-22%) but in the 2040 PM peak there is a minimal saving of around 10 seconds (-3%). This minimal time saving in the PM peak is mainly due to delays at the exit from the Wansford eastern roundabout in the DS scenario which is caused by traffic blocking back across the bridge from the Wansford western roundabout.</p> <p>The rest of the time periods also show an average saving of approximately 20-60 seconds in both directions, apart from 2040 in the PM peak in the westbound direction which shows a saving of 10 seconds.</p>

	Response	Applicant's Response
		<p>With respect to Tables 7.5 to 7.9, as set out in 7.2.3 the impact of the Scheme on the Wansford western roundabout and the local network in Wansford village has been assessed utilising the VISSIM model. VISSIM has been adopted to undertake a detailed assessment of the performance of the Wansford western roundabout. Results of this assessment are shown in Section 7.9.</p> <p>In summary the modelling results included in the TA contain an assessment of both the A47 mainline section, as well as the wider network as a whole. The economic appraisal is based on the wider area impact of the scheme across the study area, including impacts at the Wansford western roundabout.</p> <p>As noted in Section 5 of the Case for the Scheme (AS-022) with consideration of the effects of delays during construction, accident benefits, indirect taxation benefits, monetised environmental impacts and maintenance costs, the initial Benefit to Cost Ratio (BCR) is 3.2 which represents 'High' Value for Money (VfM).</p>
4	<p>4. Travel times</p> <p>On a much more minor point, Table 7.2 describes a travel time of 4.4 minutes from Wansford Road to the western roundabout of 4.4 minutes. Figure 7.13 shows this journey as being from Elton to the roundabout, a distance of just over 4 miles. As the journey is on a twisty country road, including two stretches of 30 mph limits, the 20mph Wansford limit and the 120m long single track Wansford bridge, this journey time is completely implausible.</p> <p>As with the use of the Peterborough Road A1 exit, this seems to be an example of someone doing modelling with no knowledge of the real life situation.</p>	<p>Table 7.20 of the TA (TR010039/APP/7.3 Rev 3) labels the journey time route as being from Wansford to the Wansford western roundabout to indicate the orientation of the route. Figure 7.13 show the journey time route starting from Elton Road\New Lane junction and ending at the western roundabout. This distance is approximately 1.5 miles. Please also note that the Figure has a scale in the bottom left-hand corner, which also indicates that the route length is less than 4 miles.</p> <p>Therefore, a journey time of 4.4 minutes in the AM peak in the 2040 DM scenario is considered reasonable.</p>

7 WANSFORD PARISH COUNCIL (REP3-034) - DEADLINE 3 SUBMISSION

	Response	Applicant's Response
1	<p>Comments on D2 Submission by National Highways TR010039-000555-7.6 Arboricultural Impact Assessment</p> <p>1. Introduction</p> <p>Wansford Parish Council (WPC) was very surprised to read this important assessment document as it contains many errors and appears not to have been checked by anyone.</p>	<p>This comment is noted. Please see responses below.</p>
2	<p>2. Project Title</p> <p>The cover and title page of the document refers to a completely different project.</p>	<p>This document (REP2-022) was submitted with an incorrect cover and title page, this was an administrative error. The document has been resubmitted for Deadline 4 with the correct cover and title page (TR010039/APP/6.3 Rev 1).</p>
3	<p>3. Responsibility for the Report</p> <p>Section 2.5 refers to some of the research having been done by Mott MacDonald and the author disclaims responsibility for it.</p>	<p>Section 2.5 of ES Appendix 7.6 Arboricultural Impact Assessment (TR010039/APP/6.3 Rev 1) details that tree survey data was obtained by Mott MacDonald in August 2018, along with new data collected by ADAS in July 2020 and February 2021. Section 2.5 does not disclaim responsibility but states that the Mott MacDonald survey data cannot be verified and that tree locations should be verified prior to any undertaken works, which will be undertaken as part of stage 5, Detailed Design.</p>
4	<p>4. Tree Removal</p> <p>Section 3.2 lists the trees that the scheme will impact but it fails to mention that tree T20 is a veteran oak the destruction of which is strongly opposed by the Woodland Trust (see their Deadline 2 submission).</p>	<p>ES Appendix 7.6 Arboricultural Impact Assessment (TR010039/APP/6.3 Rev 1) Appendix 4: Tree Survey Schedule states that T20 has a life stage of (V) which means T20 has been recognised as a veteran tree.</p> <p>In response to the Woodland Trust's position, please see Applicant's response to (RR-045-1) in the Applicant's Response to Relevant Representations (REP1-010).</p>

	Response	Applicant's Response
5	<p>5. TPO and CA Search Results</p> <p>Appendix 3 of the document contains a somewhat random series of documents, several of which are not current. This gives little confidence that all the relevant data has been collected.</p>	<p>The first item of ES Appendix 7.6 Arboricultural Impact Assessment (TR010039/APP/6.3 Rev 1) Appendix 3 is a screenshot of the Peterborough City Council Interactive Mapping that was used to determine the Conservation Areas (CA) close to the Scheme's proposed works. It was stated in section 2.6.1 of the ES Appendix 7.6 Arboricultural Impact Assessment that no trees surveyed are within the CA. The remaining items of Appendix 3 were provided by PCC as they were provided with the boundary of the Scheme and PCC provided the remaining documents provided in Appendix 3.</p>
6	<p>6. Conclusion</p> <p>WPC suggest that this document should be thoroughly checked and re-submitted as at present there is no confidence in its reliability.</p>	<p>The ES Appendix 7.6 Arboricultural Impact Assessment (formerly REP2-022) has been amended as detailed above and has been revised and submitted at Deadline 4 (TR010039/APP/6.3 Rev 1).</p>

8 ANGLIAN WATER (REP3-035) - PROGRESSED STATEMENTS OF COMMON GROUND (SCG) AND STATEMENT OF COMMONALITY OF THE STATEMENTS OF COMMON GROUND (SCSOCG)

	Response	Applicant's Response
1	<p>In principle, Anglian Water are agreeable to the compulsory acquisition of part of their access road and the subsequent return. However, Anglian Water would like to agree the specification of their new access road with National Highways, prior to formally agreeing.</p> <p>Anglian Water's site is also subject to a temporary acquisition. This poses increased concern for Anglian Water as the site is operational 365 days per year. Any temporary acquisition needs to be discussed prior to National Highways occupation to ensure that the site is suitably secure, Anglian Water's access is not blocked at any time, and there is no or controlled use of chemicals and hazardous substances on Anglian Water's site. To ensure compliance a licence or lease for the duration of National Highways occupation is desired.</p> <p>National Highways have been approached for a meeting by Anglian Water's agent Savills to agree the approach with Anglian Water.</p>	<p>Please refer to Applicant's Written Summary of Oral Submissions at Hearings (TR010039/EXAM/9.20) CAH1 items 5.1 and 5.2.</p>

9 ROBERT REID (REP3-036) - COMMENTS FOR ISH2 – ENVIRONMENTAL MATTERS

	Response	Applicant's Response
1	<p>With the re-engineering of the River Nene floodplain something that should not happen because Historic England claimed for many years a burial barrow near to the existing A47, the point this occurs on the river is a near 90 degree turn. During the majority of the time the river is relatively slow moving as it meanders through this part of the valley however during times of flooding when the dynamics of the river are flowing faster will this now erode the banks much faster especially as its on a sharp bend, near the outflow of Wittering Brook and the land level has been reduced allowing faster water to move onto the new floodplain. Found no references to changes in River dynamics with erosion and deposition from any agency.</p>	<p>These matters were raised in ISH2 and the Applicant relies on its response in Applicant's Written Summary of Oral Submissions at Hearings (TR010039/EXAM/9.20) ISH2 Agenda Item 4.</p>

10 ROBERT REID (REP3-037) – FURTHER COMMENTS FOR ISH2 – ENVIRONMENTAL MATTERS

	Response	Applicant's Response
1	<p>Would like to put in some points of view on biodiversity cultural heritage with regards to the relocation of Sutton station the importance of why the 2 items go together in order to keep the wildlife corridor open along the disused rail bed and to avoid the area becoming a magnet for poor behavior.</p>	<p>Please refer to Applicant's Written Summary of Oral Submissions at Hearings (TR010039/EXAM/9.20).</p>
2	<p>Also the keeping of the railway buildings together and kept within there historic environment with access from the proposed WCHER route giving access to walkers, cyclists and horse riders. This disused line carries a lot of history as it was the original route of the Great Northern rail line but was stopped from going through the Southorpe Gap due to various political reasons in its day.</p>	<p>See Common Response G in the Applicant's Response to Relevant Representations (REP1-010) for the response regarding the railway buildings and the rail line as part of that group. Please also refer to Applicant's Written Summary of Oral Submissions at Hearings (TR010039/EXAM/9.20) ISH2 items 3.4 – 3.7, and ISH3 item 3.16.</p>

11 ROBERT REID (REP3-038) - COMMENTS FOR ISH3 - TRAFFIC AND TRANSPORT

	Response	Applicant's Response
1	<p>With reference to Sutton station and the importance of retaining the station with public use and access via the WCHER route this will provide enhanced social use using green transport methods and provide connectivity plus meeting point for countryside users. Would you be in support of this? And if so could this be conveyed to those involved in making the decision on the stations relocation</p>	<p>Please also refer to Applicant's Written Summary of Oral Submissions at Hearings (TR010039/EXAM/9.20) ISH3 item 3.16.</p>
	<p>Item 2 compulsory acquisition - Land for use of the engineering of the floodplain does this have to come under compulsory purchase or can it be done under license and then returned back to existing owner. We only have a small holding and there is no options available to replace land.</p>	<p>Please also refer to Applicant's Written Summary of Oral Submissions at Hearings (TR010039/EXAM/9.20) ISH2 Agenda Item 4.</p> <p>For the Applicant to undertake permanent works the land must be compulsory purchased if the land is not already in the Applicant's ownership. In this instance, land will be purchased to excavate the compensatory flood storage (works No.32). Once the works are finished; the land will be sold back under Critchel Down rules with the relevant covenants to maintain the compensatory flood storage in perpetuity.</p>

12 ROBERT REID (REP3-039) - RESPONSE TO THE EXAMINING AUTHORITY'S FIRST WRITTEN QUESTIONS (EXQ1) - ACCEPTED AT THE DISCRETION OF THE EXAMINING AUTHORITY

ExQu	Question to:	Question	Comment	Applicant's Response
1.0.21	All Parties	<p>Covid-19 pandemic</p> <p>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>b) If so, they should explain why they hold that view, evidenced where possible.</p>	<p>On item 1.0.2. A question was put to all- Has covid had a material change on the proposed development? It may have as since and during the pandemic there has been greater usage of the Nene Way footpath alongside the river, between Wansford and Sutton, but Im not sure if this is a material change.</p>	<p>The Applicant does not believe that increased use of the existing WCH facilities as a result of the Covid-19 pandemic gives rise to any material implication regarding the Scheme.</p>
1.4.20		<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>Item 1.4.20 section f and g As a small landowner would like to see the station relocated to the south side of the existing A47 bridge and we have along with support from Landyke Trust and Parish Councils wish to retain it alongside the line with public and community use. However we are finding that PCC planning department support its location away from the area.</p>	<p>Please refer to Applicant's Response to Examining Authority's First Written Questions (REP2-036) Q1.4.20.</p>

ExQu	Question to:	Question	Comment	Applicant's Response
		e) Could the Applicant please explain what its proposals are for the recording of the asset, and how they would be secured? f) It is suggested by PCC that the Station Building may be dismantled and re-erected 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? g) Could the Applicant please explain further its proposals for the gate piers at the station?		
1.10.17		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?	Item 1.10.17 The Old Station House was occupied from 1955 by a member of staff to the Hopkinson family who purchased the station House from Burghley Estate.	Please refer to Applicant's Response to Examining Authority's First Written Questions (REP2-036) Q1.10.17.

13 DAVID LONGFOOT (REP3-040) - DEADLINE 3 SUBMISSION

	Response	Applicant's Response
1	While acknowledging that the Upton drift improvements will be satisfactory, I cannot understand why no improvements are being made on the Langley Bush Road at it's narrowest section. This is already a busy road, and when the Upton traffic has to join including wide slow moving agricultural vehicles up to 4m wide, it will be a major safety concern.	The visibility splays at the junction of Langley Bush Road and Sutton Heath Road are being improved as part of the Scheme. This point was raised that ISH3 and the Applicant has agreed an Action Point with the ExA (refer to Action Point 37 (EV-021)).
2	I am of the opinion that H.E. and Sutton Parish council have worked together to push the current scheme through without any consideration for the safety and inconvenience of the new route for the Upton residents.	Please refer to Common Responses E and F in the Applicant's Response to Relevant Representations (REP1-010).
3	You state that Upton Drift only has the traffic from Model Farm and 30 properties. You make no mention of Manor Farm with a 10,000 grain store, which is the 10 x the capacity of Model Farm's grain store, and consequently 10x the number of HGV movement and farm machinery.	This point was raised that ISH3 and the Applicant has agreed an Action Point with the ExA (refer to Action Point 37 (EV-021)).
4	Things that H.E have failed on: 1. No consultation with Upton over the new plan	Please refer to Common Response E in the Applicant's Response to Relevant Representations (REP1-010).
5	2. Health and safety has taken a back seat to Sutton's property prices.	Please refer to Common Response F in the Applicant's Response to Relevant Representations (REP1-010).

	Response	Applicant's Response
6	3. Meetings and information has been very un-satisfactory	<p>The Applicant has consulted both informally and formally throughout the development of the Scheme. Details of consultation are set out in the Consultation Report (AS-011) and its Annexes (APP-024 – APP-038).</p> <p>Please refer to Common Response E in the Applicant's Response to Relevant Representations (REP1-010).</p>
7	4. There has been no consultation with the five active businesses in Upton as to how the plans would affect them.	Please refer to item 6 above.
8	5. Promised independent safety audit for in October 2020 not delivered until June 2021, giving Upton insufficient time to address the proposals.	Please refer to item 6 above.
9	6. No independent traffic survey. No clear idea of the amount using the road and no account of the extra traffic that the road will need to take due to future development.	<p>As part of the 2019 surveys, shown in Figure 5-4 of the TA (TR010039/APP/7.3 Rev 3), traffic data was collected along Upton Road north of the Nene Way roundabout. In total over a 12-hour period in two directions around 17 HGV vehicles were captured. This represents approximately 5% of the total 2-way traffic flow.</p> <p>In line with the traffic forecast across the network, Upton Road also includes traffic growth based on the methodology detailed in Section 6.6 of the TA.</p>
10	As you consider that Langley Bush Road is not dangerous at present. I will be holding H.E and Sutton Parish council responsible for any increase in accidents involving life in danger.	Please refer to Common Response F in the Applicant's Response to Relevant Representations (REP1-010).