

# A47 Wansford to Sutton Dualling

**Scheme Number: TR010039**

## **Volume 9** **9.16 Applicant's Response to Written** **Representations**

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

Planning Act 2008

March 2022

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Infrastructure Planning

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

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

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**9.16 APPLICANT'S RESPONSE TO WRITTEN  
REPRESENTATIONS**

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<b>Rule Number</b>	Rule 8(1)(c)
<b>Planning Inspectorate Scheme Reference</b>	TR010039
<b>Application Document Reference</b>	TR010039/EXAM/9.16
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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) response to the Written Representations, published on the 17 February 2022.

## 2 FIGHT4UPTON (REP1-013) DEADLINE 1 SUBMISSION - WRITTEN REPRESENTATIONS

Reference	Written Representation	Applicant's Response
Document A	<p>Objection to A47 dualling Sutton to Wansford Scheme.</p> <p>We object to this application on three grounds:</p> <ol style="list-style-type: none"> <li>1. Lack of consultation with Upton village and surrounding rural area. The 3 options in the statutory consultation did not involve severing Upton Main Road.</li> <li>2. The plans are unsafe for Upton Drift and Langley Bush Road</li> <li>3. The plans sever historical links for pedestrians, cyclists and horse-riders with Sutton, Castor &amp; Ailsworth</li> </ol>	<p>No response required.</p> <p>This Written Representation is identical to Relevant Representation RR-008, RR-009, and RR-020. Please see the Applicant's Response to the Relevant Representations (<b>REP1-010</b>).</p>
1	<p><b>Detailed explanation:</b></p> <p><b>1. Lack of consultation with Upton village and surrounding rural area. The 3 options in the statutory consultation did not involve severing Upton Main Road.</b></p> <p>In 2017 Highways England issued a preferred route document [REDACTED]</p> <p>It listed three options and a preferred route. Non of the routes identified involved the moving of the Sutton roundabout or the severing of Uptons access road.</p> <p>For this reason Upton village and farms did not actively participate in the statutory consultation process. In fact the brochure [REDACTED] for this consultation had a comprehensive design that did not materially impact Upton.</p>	<p>Please refer to <b>Common Response E</b> of the Applicant's Response to the Relevant Representations (<b>REP1-010</b>).</p>

Reference	Written Representation	Applicant's Response
	<p>Then in July 2020 the village heard a rumour of the Upton road being severed. We contacted Highways England who told a village meeting of this plan (when would we have been told if we hadn't asked?). The meeting was only open to residents (one per household) of the village and did not include the tenant farmers or Milton Estate, the main land owner. In the meeting a google map was projected on a screen and Highways England, Craig Stirzaker and Jonathan Donlevy pointed at the proposed new route. We had no plan, no papers. We were then asked to vote on the following:</p> <ol style="list-style-type: none"> <li>1. The proposal to close Upton road and have one access along Langley Bush Road (LBR) and The Drift.</li> <li>2. To divert all traffic from Sutton Heath Road (SHR) and LBR through Upton and to the current roundabout location on the A47.</li> </ol> <p>With no written plans, no time to consider the implications we were pressed in to a vote. The village voted for option 1.</p> <p>On reflection the village realised that this was a sham vote for the following reasons:</p> <ol style="list-style-type: none"> <li>1. Not all landowners, tenants and resident's were allowed to attend the meeting or had notice of the meeting.</li> <li>2. No notice of the plans in advance and time to consider the implications.</li> <li>3. Voting for option 1 was on the assurance from Highways England that LBR and The Drift would be improved to two way roads (this is now being denied)</li> <li>4. The options presented were not the only options available and in fact we believe option 2 above was never on the table.</li> </ol>	

Reference	Written Representation	Applicant's Response
2	<p><b>2. The plans are unsafe for Upton Drift and Langley Bush Road</b></p> <p>Currently the majority of traffic to and from the village and farms is along Upton Road. The local traffic avoids The Drift and LBR because it is narrow and has blind bends caused by hedgerows and over-grown verges.</p> <p>The road is used by cyclists, pedestrians and horse riders as well as cars, lorries and agricultural vehicles. Forcing all traffic to use The Drift and LBR will lead to congestion at peak times and there is no safe separation for pedestrians, cyclists and horseriders. Langley Bush Road is very dangerous for these users. (Currently separation on Upton Road is achieved through wide verges) No account has been taken in traffic modelling for the extra traffic from North of Peterborough that will use this route to the A47 after the project. Human nature is that people will be attracted to this route as the dangerous SHR junction has gone. We believe traffic volume will be substantially higher than estimated.</p> <p>Many residents in Upton have had accidents over the years along these roads.</p> <p>The roads are too narrow for modern agricultural vehicles and lorries to pass.</p>	<p>Please refer to <b>Common Response F</b> of the Applicant's Response to the Relevant Representations (<b>REP1-010</b>).</p> <p>Figure 6 1 in Section 6.2 of the Transport Assessment (TA) (<b>REP2-025</b>) shows the extent of the Wansford Transport Model (WTM) study area used for the assessment of the Scheme. The WTM covers the strategic traffic movements across the A47 corridor between Wansford and Peterborough. To the north the buffer area of the model extends to the towns of Sleaford and Grantham. The model is therefore capable of assessing the wider area traffic patterns along Langley Bush Road.</p> <p>Section 7.12.7 of the TA (<b>REP2-025</b>) describes the road safety benefits of the Scheme. The COBA-LT analysis demonstrates that the Scheme improves road safety overall by reducing the numbers of accidents and consequently the number of casualties. The Scheme improves safety along the A47 by providing upgraded dual carriageway alignment and a separate A1 eastbound off-slip. In total, over a 60-year timeframe, the Scheme's improvements will save a total of 265 casualties and 42 KSIs (killed or seriously injured) (Table 7-16).</p>
	<p><b>3. The plans sever historical links for pedestrians, cyclists and horse-riders with Sutton, Castor &amp; Ailsworth</b></p> <p>The five parishes (Upton, Sutton, Castor, Ailsworth, Marholm) have had historical links as communities together with Milton since the 16th century (as evidenced by the book published by the CAMUS project- see image of front cover (left))</p> <p>This project nearly doubles the distance for cycling/walking from</p>	<p>Movement is still enabled for pedestrians, cyclists and horses and the historic context is not obscured, as it is preserved in the historical record.</p> <p>Please refer to <b>Common Responses C and F</b> of the Applicant's Response to Relevant Representations (<b>REP1-010</b>).</p>

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	<p>Upton to Sutton, an additional 1.62km (from 1.92km to 3.54km). LBR is Dangerous for pedestrians, horses and cyclists as there is no separation, no escape route if two large lorries or agricultural vehicles to pass.</p> <p>Moreover there are no plans currently for a bridge or underpass and so pedestrians and cyclists will have to negotiate across a busy dual carriageway / roundabout.</p> <p>The reality is that this won't be safe or palatable to many people and so the community links will be severed.</p>	



### 3 WANSFORD PARISH COUNCIL (REP2-071)

Reference	Written Representation	Applicant's Response
Document A	<p><b>The Alignment of the A47 Dualling Between the Wansford Eastern Roundabout and the Old Railway A Submission to the Planning Inspectorate – Scheme Ref: TRO10039</b></p>	No response required.
	<p><b>Executive Summary</b></p> <p>It is clear from the project documentation that the option to align the upgraded A47 through the Scheduled Monument east of Sacrewell Farm has never been seriously considered by National Highways. They say that the reason it has never been considered is that it requires exception circumstances to impinge on the area of a Scheduled Monument. The applicable regulations actually say that there has to be an exceptional reason to do substantial damage to a Scheduled Monument.</p> <p>Examination of the make up of the Scheduled Monument shows that there is a path through the area that does not touch any of the identified features of the Monument so no substantial damage would be done.</p> <p>Using this route would take the road away from the river bank making construction much cheaper and less risky, minimize disruption and traffic management during construction, allow the existing road to be used for non-motorised traffic, reduce the spread of noise and remove the disturbance of the sensitive wildlife corridor along the river.</p>	See responses below.
2 2.1	<p><b>2 Introduction</b></p> <p><b>2.1 Purpose of this Document</b></p> <p>This document has been produced by Wansford Parish Council (WPC) to demonstrate that there is an alternative alignment for the proposed A47 in the area of the Scheduled Monument (SM) to the east of Sacrewell Farmhouse and to the west of the</p>	<p>An alignment which severed the Scheduled Monument was one of the options investigated and considered by National Highways during Stage 1 (Option Identification) and Stage 2 (Option Selection).</p> <p>The option was ruled out at the end of Stage 2 on the basis</p>

Reference	Written Representation	Applicant's Response
	<p>disused railway line. Using this alignment has the following advantages:</p> <ul style="list-style-type: none"> <li>• It means that almost all the new construction is off the line of the existing road, greatly reducing the amount of traffic management and disruption during the work.</li> <li>• It leaves the old road alignment as an excellent route for horse riders, cyclists and pedestrians.</li> <li>• It removes the road from an area of known geological instability, reducing risks during construction and in the long term.</li> <li>• It allows the road to be widened in the future if needed.</li> <li>• It avoids damage to the County Wildlife Site along the river Nene and the need for artificial flood compensation.</li> <li>• It reduces the spread of noise from the new road.</li> <li>• It will reduce the cost of the project considerably.</li> </ul> <p>Despite all these factors, the alignment has never been seriously investigated by National Highways (NH).</p>	<p>there that were other viable alignment options which avoided the Scheduled Monument.</p> <p>The Scheme Assessment Report (SAR) (2018) (<b>AS-030</b>) details the conclusions of Stage 1 and Stage 2. The minutes from the Preferred Route Decision meeting are contained in Appendix O of the SAR (<b>AS-031</b>).</p> <p>Further details regarding consultation with Historic England on the Scheduled Monument was provided in <b>Common Response H</b> of the Applicant's Response to Relevant Representations (<b>REP1-010</b>).</p>
2.2	<p><b>2.2 Why This Document is Needed</b></p> <p>In the 5 years since the project started, NH and their antecedents have always said that they are unable to encroach on the Scheduled monument. This is clearly demonstrated by their recent common response H to relevant representations "A road entirely north of the existing A47 is not feasible due to the location and extent of the Scheduled Monument".</p> <p>This situation has come about because NH have simply been unwilling to enter into dialogue about the issue. This document seeks to demonstrate exactly why the route is feasible.</p>	See responses below.
2.3	<p><b>2.3 The Route</b></p> <p>The alternative route that is being proposed is similar to one of</p>	The Applicant has consulted with Wansford Parish Council, both informally and formally throughout the development of the

Reference	Written Representation	Applicant's Response
	<p>the options proposed in the Alternative Visions document that was presented to NH in 2018. When that document was presented to the then project manager, he simply put it down on the table without opening it. When asked if he was going to read it and take note of the contents, his reply was "Probably not".</p> <p>Figure 1 below shows the outline of the alternative route. The drawing is based on the current NH proposals but for ease of understanding the findings from the Headland Archeology magnetometersurvey of the SM have been superimposed on it. This shows the position of the major features of the SM. The revised road alignment that is shown in red is simply a freehand sketch and it would have to be developed to get the precise alignment.</p>	<p>Scheme. Details of consultation are set out in the Consultation Report (<b>APP-023</b>) and its Annexes (<b>APP-024 – APP-038</b>).</p> <p>Further responses regarding the position of the major features of the Scheduled Monument are provided below.</p>
<p>3 3.1</p>	<p><b>3 Discussion of Routes Through the Scheduled Monument</b> <b>3.1 National Highways</b></p> <p>Even though the route shown in Figure 1 was offered by National Highways in their initial consultation, they have consistently said that they cannot impinge on the SM because there is a viable alternative and therefore there is no Exceptional Circumstance to justify touching the SM. They have also claimed that they cannot challenge Historic England on this "because it is not their role to challenge another government department".</p> <p>The reality is that NH seem to have misunderstood the criteria for impinging on a Scheduled Monument.</p> <p>The position of a Scheduled Monument within the context of a Development Consent Order application for a national infrastructure project is governed by the National Policy Statement for National Networks (NPSNN) (Dept. of Transport, December 2014). This document states that projects doing substantial damage to a Scheduled Monument will only be</p>	<p>Known features of the Scheduled Monument have been identified to date through aerial photography, magnetometry and surface artefact collection. No intrusive works have been undertaken to verify these sources. In the results of the intrusive works undertaken for the Scheme, a significant number of features were identified in trenching that had not been previously indicated, including burials. This suggests that the area indicated has the potential to contain as-yet unidentified features.</p> <p>Additionally, if the indicated area is truly devoid of archaeological features, this itself would be an important part of how the Scheduled Monument is understood. Use of negative space and partitions between features may provide context and information on the use and conceptualization of those features.</p> <p>Bifurcation of the Scheduled Monument would result in substantial harm in either eventuality.</p> <p>The use of magnetometry is the most appropriate form of</p>

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	<p>approved in exceptional circumstances. This essentially sets up two tests, whether the damage is substantial and whether the circumstances are exceptional.</p> <p>The route that is proposed avoids all the identified features of the Scheduled Monument except for an area of quarrying that is almost certainly related to the construction of the existing A47. It therefore does not do substantial damage to the Scheduled Monument. Before construction, the 25m wide path required for the new road should be surveyed using alternative non-invasive techniques such as ground penetrating radar and any features found can be excavated. Because the available corridor between the identified features is considerably wider than the road, there is scope to modify the alignment if something major is found.</p>	<p>geophysical survey for this type of monument and land form: Resistivity would be potentially better for identifying fine detail of solid structures such as walls, which are not indicated by the magnetic results.</p> <p>Ground penetrating radar would indicate the depth of buried surfaces and features. This may be useful for the development of conservation management plans for the monument in the long term but is not relevant to the Scheme.</p> <p>Micro-seismic and micro-gravity survey would aid in the identification of voids, such as backfilled quarries and larger burial chambers. Unfortunately, the A47 would have to be entirely shut down to enable these surveys due to the sensitivity of the equipment and interference from moving vehicles. Additionally, microgravity survey generally does not give a resolution that would be useful for this asset and micro-seismic survey is generally more suited to discrete sites such as burial mounds and fogous rather than more diffuse sites like this.</p>
	<p>The features of the Scheduled Monument are discussed in some detail in a Wansford Parish Council document entitled The Alignment of the A47 Dualling Between the Wansford Eastern Roundabout and the Old Railway</p> <p>The minutes of the direct meeting between NH and Historic England show that NH never seriously proposed the option of going through the SM, presenting it just as a proposal by a third party with no ownership by NH.</p> <p>As the project developed there were a series of meetings between NH, Peterborough City Council (PCC) and Historic England to discuss the various environmental and archaeological aspects of the scheme.</p>	<p>The Applicant has consulted with Wansford Parish Council, both informally and formally throughout the development of the Scheme. Details of consultation are set out in the Consultation Report (<b>APP-023</b>) and its Annexes (<b>APP-024 – APP-038</b>).</p>

Reference	Written Representation	Applicant's Response
	<p>Wansford and Sutton Parish Councils repeatedly asked to attend these meetings but the request was denied by NH on the grounds that these meetings were "for professionals". In view of the professional qualifications held by those who would have represented the Parish Councils, this was clearly just a cover for NH just not wanting the PCs at the meetings. Feedback from the PCC staff at the meetings was that they were just a presentation by NH of the project with no real discussion. The PCC staff said that they would have been very happy to have the Parish Councils there as they had done much more background work on the scheme than PCC.</p>	
	<p>At various times NH has also said that the northern route is impossible because of the Sutton Heath and Bog SSSI. This cannot be determined until the alignment has been calculated in detail but if there is a clash it is with the tail of the SSSI, not the part which contains the vegetation which forms the reason for the SSSI. The listing makes it clear that the tail is there simply to protect the drainage system that serves the main body of the SSSI. The extent of the area in question has been changed during the life of the SSSI and there seems no reason why it could not be changed again, given appropriate design of the watercourse which drains the SSSI.</p>	<p>The SSSI is a statutory designation and its location and qualifying features have been considered during the development of the Scheme.</p>
	<p>More recently, Wansford Parish Council has requested NH to examine the cost difference between the current route and a route through the Scheduled Monument. NH said that they were unable to do this as they had no detailed cost data for the project. Galliford Try, their contractors simply stated that they had no interest in supplying this information. Wansford Parish Council therefore has had to rely on the estimates given by NH in 2018 that the difference was between £6 million and £11 million. Most of this difference is in much simplified earthworks and traffic management.</p>	<p>The Applicant does not consider that preparing this cost calculation is appropriate or reasonable. The route through the Scheduled Monument has been discounted, for the reasons set out previously by the Applicant and in Historic England's Written Representation (<b>REP2-074</b>).</p>

Reference	Written Representation	Applicant's Response
3.2	<p><b>3.2 Historic England</b></p> <p>After direct requests from Wansford and Sutton Parish Councils, two meetings have been held with Historic England (HE). NH were invited to attend both these meetings but they declined, stating that it was not good use of their time.</p> <p>The first meeting was conducted in early 2018 was with the then the regional director. HE gave a good briefing on the status of SMs and then stated that on no account would they allow a road to be built through the SM. Further probing revealed that those at the meeting did not actually know what was in this particular SM.</p> <p>In 2018, HE conducted a review of the SM and it was for this that the document in Appendix 1 was produced. As a result of the review, HE decided to extend the SM further north to include features that clearly show as crop marks but which had not been included in the original 1962 listing. This was a sensible change although it does not reflect well on the research done for the original listing. They also introduced a new eastern boundary which exactly followed the original curved boundary but translated 15m to the west. No explanation was given for that but, because the scale of the base maps used for the listing had changed, there is a strong suspicion that it was simply a draughting error. Certainly, the change in the eastern boundary removed an area with a considerable history of surface finds from the SSSI.</p>	<p>The Applicant has consulted with Wansford Parish Council, both informally and formally throughout the development of the Scheme. Details of consultation are set out in the Consultation Report (<b>APP-023</b>) and its Annexes (<b>APP-024 – APP-038</b>).</p> <p>Please also refer to <b>Common Response H</b> of the Applicant's Response to Relevant Representations (<b>REP1-010</b>).</p>
	<p>After review, Wansford and Sutton Parish Councils were able to arrange a meeting with a team from HE. This was held on the 23rd January 2020. At that meeting, the parish team asked what analysis HE had done on the extent and contents of the SM. The response was that they had done no analysis but they had relied</p>	<p>The Applicant notes that Wansford Parish Council asked the Secretary of State to review the listing of the Scheduled Monument and presumes that the Secretary of State declined to remove or amend the listing. It may assist the Examination if the ExA requests any further relevant documents in respect of any</p>

Reference	Written Representation	Applicant's Response
	<p>on the work done by Wansford Parish Council. The parish representatives then asked what the objection was to putting the road through the SM over the route where there were no identified objects. HE responded that no evidence of significant objects was not a reason to suppose that there were none there and, even if there was nothing, the gaps between the identified features were important to the landscape of the monument. HE was asked to define what they meant by landscape in this context but they were unable to do so.</p> <p>After this meeting, Wansford Parish Council asked for a review of the new listing by the Secretary of State. During the review, HE claimed that they had moved the eastern boundary of the SM by 15m to remove from the area a modern quarry in the south eastern corner. When asked what evidence of modern quarrying this was based on, they were unable to give any. The finding of the review was that the new listing stood as Wansford Parish Council had not provided any information that was not available during the review. The fact that HE had not analyzed the site or used the data provided did not seem to be a consideration.</p>	<p>listing review.</p> <p>In circumstances where it appears that the Secretary of State has recently confirmed a listing, the ExA can be certain that the Secretary of State would not a short time later sanction development within and over that listed asset.</p>
4	<p><b>4 Geotechnical Risk</b></p> <p>Wansford Parish Council have raised the issue of geotechnical risk in the area of the escarpment down to the river Nene several times. In the first Issue Specific Hearing this was dismissed by the counsel for National Highways as being something that would be dealt with in detailed design. This unfortunately showed a lack of understanding of geotechnical risk.</p> <p>In document TR010039-000447 National Highways 9.2 9.2 Ground Investigation, the author clearly identifies in Section 2.3.4 the whole river area from the A1 eastward to the old</p>	<p>Please refer to Common Response B of the Applicant's Response to Relevant Representations (<b>REP1-010</b>).</p> <p>Please also refer to the Applicant's Response to the Examining Authority's First Written Questions ExQ1.5.12 (<b>REP2-035</b>).</p> <p>A supplementary ground investigation is currently underway. A number of exploratory holes including the excavation of trial pits have been proposed along the alignment in order to target both where embankments are proposed, and in areas where the Whitby Mudstone (Lias) is likely to be encountered at relatively shallow depth.</p>

Reference	Written Representation	Applicant's Response
	<p>railway line as being sensitive geological areas. He quotes the issues with the pumping station, the filling station and the power poles as being clear evidence of instability. Despite this, section 2.14 describes the area where the power poles have moved as having a low potential for landslides. This is not logical.</p> <p>NH have said that they are going to do further ground investigation in this area which is sensible but that does not get away from the fundamental difficulty of working on slopes with weak clay layers in them. Several of the soil types in this area have thin lenses of weak clay and silt interleaved with gravel, sands and weathered limestone. These may or may not be picked up by the ground investigation but it is very difficult to ascribe soil properties to them. This situation is made worse when the moisture content of the clay layers change as it would when the river floods.</p> <p>Designers can try to get around these issues by building a very conservative structure including piles to cut through a slip plane but this is expensive and the piling itself may trigger ground movements. Early in his engineering career, the author was fortunately work with Dr Chandler who sorted out the problems with the Anglia Water pumping station after it moved during construction. When asked what the best way was to avoid problems when building structures on weak clay slopes, his advice was to build the structure somewhere else because you can never accurately analyze the behaviour of the slope in both the short and long terms.</p> <p>If an attempt was made in the future to widen the road because of increasing traffic volumes, the planned alignment would either require the road to encroach into the SM or be built further out over the Nene escarpment. The former would damage the southern feature of the SM and the latter would come at very</p>	<p>The purpose of these exploratory holes is to investigate the potential presence of relic shear surfaces, identified and attributed to the historical slip at the pumping station.</p> <p>Ground conditions encountered will feed into ground models to aid detailed design.</p> <p>In addition, it is intended to undertake a further walkover to identify areas of instability, i.e., where failures or indicative features have occurred, such as back scars, ponding, and bulging.</p> <p>The combination of this further information shall allow the assessment of the existing and proposed slopes, along with potential measures to provide additional support to the slopes where required.</p> <p>Some of the measures that could be considered include, but are not limited to, utilisation of sheet piles, soil nails, and construction of shear keys.</p>



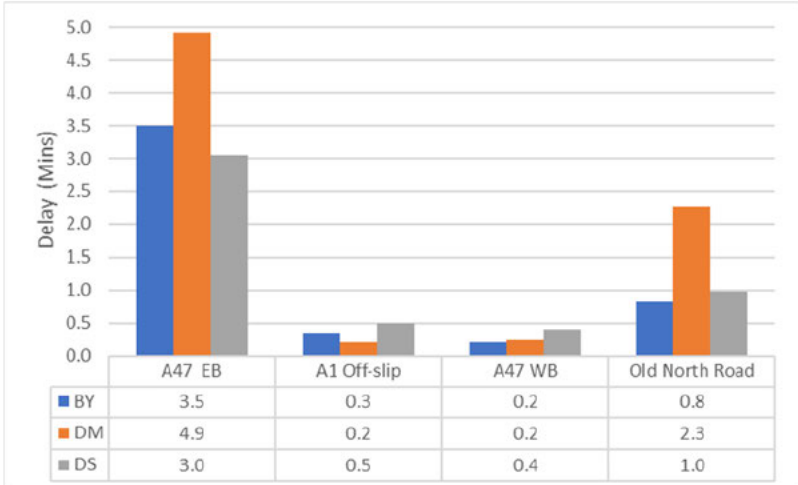
Reference	Written Representation	Applicant's Response
	high cost and risk.	
5	<p><b>5 Conclusions</b></p> <p>It is clear that the option to use an alignment through the Scheduled Monument avoiding the identified features of interest has never been seriously considered by National Highways. As a result they are proposing to build a new road on an alignment that has a known history of slope failures. Conservative design may reduce the chance of problems but it cannot remove them entirely and they cost large amounts of money. It is understood that the cost of the project is not directly a planning matter but wasting public money should be a concern to all.</p> <p>Because the new road will be built out over the slope to the river, the noise spread from it will be considerable and it will disrupt the valuable wildlife corridor along the river. The slope makes the provision of good facilities for horse riders, cyclists and pedestrians very difficult.</p> <p>Moving the road away from the river, also removes the need for flood compensation which damages privately owned land.</p> <p>There does not appear to be a downside to routing the road through the Scheduled Monument provided the route is chosen to avoid the identified features. If all roads were planned to avoid archaeological remains which have not been identified despite a state of the art non-intrusive investigation, road construction would have to stop.</p>	<p>See response above to 3.1 regarding harm to the Scheduled Monument.</p> <p>The effects of noise and vibration have been set out in Environmental Statement (ES) Chapter 11 (<b>REP2-015</b>) and the effects on biodiversity have been set out in ES Chapter 8 Biodiversity (<b>AS-015</b>). The Scheme makes provision for horse riders, cyclists and pedestrians as shown on the Rights of Way and Access Plans (<b>REP2-004</b>).</p> <p>The Scheme encroaches slightly on the Scheduled Monument in order to reduce the land required for flood compensation.</p>

## 4 WANSFORD PARISH COUNCIL (REP2-072)

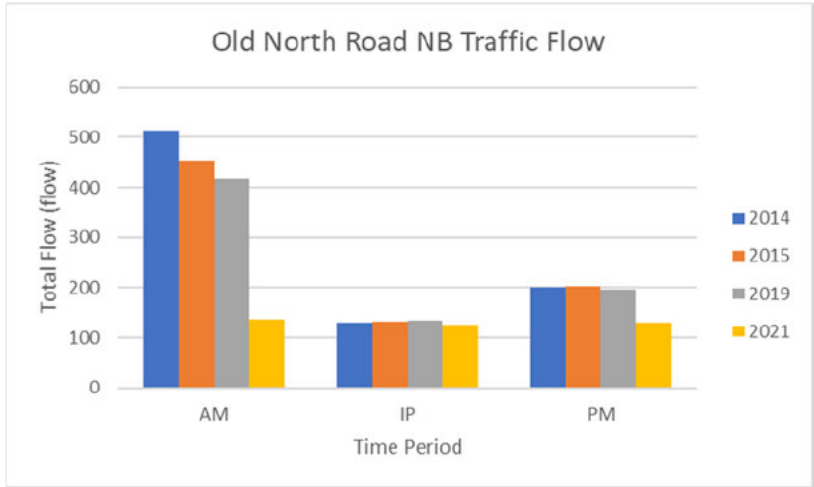
Reference	Written Representation	Applicant's Response
Document B	<p><b>A47 Wansford to Sutton – The Wansford Western Roundabout A Submission to the Planning Inspectorate - Scheme Ref:TR010039</b></p>	
1 1.1	<p><b>1 Introduction</b> <b>1.1 Purpose of this Document</b> This document has been produced by Wansford Parish Council to suggest to the Planning Inspectorate that the decision to make no significant modifications to the Wansford Western Roundabout as part of the A47 Wansford to Sutton Dualling is a mistake that will remove many of the benefits resulting from the rest of the scheme.</p>	<p>This written representation goes significantly beyond the matters to be addressed in this Examination, and presents as a challenge to the Road Investment Strategy and the Applicant's internal project management decision-making.</p> <p>The Applicant is entitled to bring forward a scheme which it considers to be reasonable, which complies with the relevant statutory and policy tests, and which is within the Applicant's budget. Modifications to the Western Roundabout are a significant proposition, and outside the scope of this Scheme. This Examination is not the forum to assert that further development ought to take place, and the fact that there are further modifications which the Applicant could make does not make this Scheme unacceptable against the relevant tests in the NPSNN.</p> <p>The Applicant has undertaken traffic modelling and economic appraisal assessments of the Scheme. These assessments show that the Scheme provides benefits to the overall operation of the network and represents a High Value for Money (VfM).</p> <p>As discussed in Section 7.9 of the TA (<b>REP2-026</b>) delay and queues are expected at the A47/A1 western roundabout in both the DM and DS scenarios. In particular, delays are forecast on the A47 eastbound and Old North Road approach arms. However, the results indicate that the DS scenario provides a relative improvement compared to the DM.</p>

Reference	Written Representation	Applicant's Response
		<p>Therefore, although the Scheme does not resolve the issues at western roundabout, it still provides benefits and represent value for money.</p> <p>Nevertheless, without prejudice to the position set out, the Applicant has endeavored to respond to the analysis provided in this written representation to assist and clarify issues.</p>
1.2	<p><b>1.2 Why This Document is Needed</b></p> <p>When the project was first publicized in late 2016, Highways England (now National Highways (NH)) stated that the Wansford Western Roundabout was outside the scope of the project. Wansford Parish Council (WPC) pointed out at the launch meeting that this made no sense and NH said that they would look at this again.</p> <p>Later NH introduced various modifications to the western roundabout but the main one, an additional lane on the A1 northbound exit slip road was illogical and was later found to be the result of an error in the traffic modelling. Since then, NH have reduced the changes to the western roundabout to the provision of an extra exit lane on the eastbound A47.</p> <p>In 2020 and 2021 NH published a series of traffic projections and models that show that the roundabout is already overloaded. The most recent traffic study, published as TR010039-Volume 7 7.3 Transport Assessment is based on a set of traffic projections which show the traffic joining the A47 from Old North Road Wansford halving from its 2015 volume. This came up earlier and WPC pointed out that this was an error but NH have continued to use these numbers. Traffic volume measurements taken recently have shown that the traffic on Old North Road has not declined.</p>	<p>The transport modelling analysis referred to in "The Wansford Western Roundabout A Submission to the Planning Inspectorate - Scheme Ref: TR010938" has now been superseded by the data provided in TA (<b>REP2-026</b>). Commentary and discussion included in this response is therefore related to the TA data rather than any superseded information.</p> <p>Section 7.3 of the TA includes the annual average daily traffic (AADT) results for each forecast scenario on Old North Road. The results show the level of traffic on Old North Road decreasing from the 2015 Base Year (BY) (4,500 AADT) in both the DM 2025 (2600 AADT) and 2040 (3100 AADT) scenarios.</p> <p>Section 7.8 outlines the AM and PM peak hour flow impacts of the scheme on the local road network based on two-way flows in Passenger Carrier Units (PCU). With respect to Old North Road:</p> <ul style="list-style-type: none"> <li>• BY 2015 decreases from 550 PCU to 390 PCU in 2025 DM scenario and 410 PCU in the 2040 DM scenario</li> <li>• In the PM peak flows decrease on Old North Road from 400 PCU to 220 PCU in the 2025 DM scenario and 320 PCU in the 2040 DM scenario</li> </ul> <p>Additionally, Table 7-14 in section 7.8 shows the total one-way traffic flow in to Wansford village on Old North Road, Old</p>

Reference	Written Representation	Applicant's Response
	<p>This document attempts to correct these errors and suggest an alternative solution.</p>	<p>Leicester Road, Peterborough Road and Bridge End. The table shows the change in the number of trips in Wansford Village in the different forecast scenarios. The analysis in Table 7.14 provides the comparison of the 2015 base year scenario to the DM and DS 2025 and 2040 scenarios for the AM and PM peak periods as well as the overall daily flow (AADT rounded to the nearest 100 vehicles).</p> <p>Overall, there is a slight decrease in traffic accessing Wansford village in the future year scenarios as AADT flows slightly reduce in the DM and DS scenarios by around 1500 vehicles in 2025 and 900 to 200 vehicles in 2040. However, although the overall daily traffic levels decrease, there is a slight increase in AM peak hour traffic (approx. 2025 DS: 20 PCU, 2040 DM 100 PCU, 2040 DS 280 PCU).</p> <p>In summary the traffic modelling analysis shows that, in terms of daily traffic (AADT) there is a slight decrease in traffic through accessing Wansford Village in the future year scenarios when compared to the existing situation.</p> <p>It should be noted that, a large proportion of the traffic growth will come from the wider area rather than Wansford village, this will create an increase in traffic on the strategic A1 and A47 roads and therefore reduce the available capacity for through traffic side road movements at intersecting junctions.</p> <p>Since the introduction of the 20mph speed limit zone the analysis of the observed traffic data shows that there is a slight reduction in traffic during the peak hours although the IP remains the same.</p> <p>The combination of these factors reduces the attractiveness of Old North Road, as well as the other roads in Wansford village,</p>

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		<p>for daily through traffic movements.</p> <p>Based on the VISSIM model analysis, shown in Figure 4-1, it can be seen that despite the reduction in traffic flows, delays on Old North Road approach increase in the DM relative to the BY by around 1.5 mins. This additional delay deters through traffic from using Old North Road.</p>  <table border="1" data-bbox="1243 901 1971 1013"> <thead> <tr> <th></th> <th>A47 EB</th> <th>A1 Off-slip</th> <th>A47 WB</th> <th>Old North Road</th> </tr> </thead> <tbody> <tr> <td>■ BY</td> <td>3.5</td> <td>0.3</td> <td>0.2</td> <td>0.8</td> </tr> <tr> <td>■ DM</td> <td>4.9</td> <td>0.2</td> <td>0.2</td> <td>2.3</td> </tr> <tr> <td>■ DS</td> <td>3.0</td> <td>0.5</td> <td>0.4</td> <td>1.0</td> </tr> </tbody> </table> <p><i>Figure 4-1: Wansford West roundabout AM peak – average vehicle delay</i></p> <p>Table 4-1 below shows observed data from 2014, 2016, 2019 and 2021 for Old North Road for the AM, IP and PM peak time periods for total vehicles in the Northbound and Southbound directions. Table 4-1 has also been provided in Annex A for ease of viewing.</p> <p><i>Table 4-1: Old North Road Traffic Count Data</i></p> <table border="1" data-bbox="1198 1324 2038 1388"> <thead> <tr> <th rowspan="2">Location</th> <th rowspan="2">Dir</th> <th colspan="3">Observed Flow 2014 (veh)</th> <th colspan="3">Observed flow 2016 (veh)</th> <th colspan="3">Observed flow 2019 (veh)</th> <th colspan="3">Observed Flow 2021 (veh)</th> </tr> <tr> <th>AM</th> <th>IP</th> <th>PM</th> <th>AM</th> <th>IP</th> <th>PM</th> <th>AM</th> <th>IP</th> <th>PM</th> <th>AM</th> <th>IP</th> <th>PM</th> </tr> </thead> <tbody> <tr> <td>Old North Road</td> <td>SB</td> <td>105</td> <td>107</td> <td>229</td> <td>100</td> <td>119</td> <td>218</td> <td>119</td> <td>119</td> <td>195</td> <td>161</td> <td>122</td> <td>345</td> </tr> <tr> <td>Old North Road</td> <td>NB</td> <td>513</td> <td>131</td> <td>201</td> <td>453</td> <td>132</td> <td>202</td> <td>417</td> <td>135</td> <td>196</td> <td>136</td> <td>126</td> <td>330</td> </tr> </tbody> </table>		A47 EB	A1 Off-slip	A47 WB	Old North Road	■ BY	3.5	0.3	0.2	0.8	■ DM	4.9	0.2	0.2	2.3	■ DS	3.0	0.5	0.4	1.0	Location	Dir	Observed Flow 2014 (veh)			Observed flow 2016 (veh)			Observed flow 2019 (veh)			Observed Flow 2021 (veh)			AM	IP	PM	AM	IP	PM	AM	IP	PM	AM	IP	PM	Old North Road	SB	105	107	229	100	119	218	119	119	195	161	122	345	Old North Road	NB	513	131	201	453	132	202	417	135	196	136	126	330
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		<p>There is a general decreasing trend in vehicles from 2014 to 2019 and 2021 in the AM and PM peak periods. In particular there is a significant decrease in 2021 in the AM peak. This potentially may be the result of the impact of the COVID-19 pandemic. However, the general decrease in traffic, indicates a reduction in the attractiveness of Old North Road for through traffic.</p> <p>Furthermore, the VISSIM model analysis shows a decrease in traffic volumes on Old North Road. This supports the SATURN strategic modelling analysis. In Table 7-16 of Section 7.9 the VISSIM model shows the following with respect to the traffic flows on Old North Road northbound:</p> <ul style="list-style-type: none"> <li>• In the AM peak the 2019 Base year flow decreases from 386 vehicles to 330 in the 2040 Do Minimum</li> <li>• In the PM peak the 2019 Base year flow decreases from 180 vehicles to 142 in the 2040 Do Minimum</li> </ul>
<p>2 2.1</p>	<p><b>2 Traffic Data and Projections</b> In 2015, NH carried out a series of traffic measurements in Wansford and these were followed by some measurements in 2019. In September 2019 NH published a set of traffic figures that are reproduced below as Table 1.</p> <p>These figures show a growth in most traffic flows between the base year (2015) and 2022 of between 15 and 25%. The flow off the A1 northbound to head east on the A47 was show as increasing by 63% but discussion with NH showed that this figure was based on all traffic coming north up the A1 using this junction to access the A47. This ignored the shorter route for this traffic via the eastern section of the Peterborough Parkway system.</p>	<p>The transport modelling analysis referred to in “The Wansford Western Roundabout A Submission to the Planning Inspectorate - Scheme Ref:TR010039” as now been superseded by the data provided in the TA (<b>REP2-026</b>). Commentary and discussion included in this response is therefore related to the TA data rather than any superseded information.</p> <p>The previous modelling is superseded due to a number of factors including revisions to the Scheme, different forecast years and updated TAG guidance and Road Traffic Forecast (RTF).</p> <p>Discussion on the results of the transport modelling assessment and the decreasing trend in observed data for Old North Road is included in the Applicant's response above.</p>

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	<p>For the traffic on Old North Road Wansford (described by NH as the A6118 even though it was downgraded to be the C340 in 2017) the traffic was shown reducing by 45% and even by 2037, it is still shown as 38% below the 2015 figure. The two way flow in 2015 was 4400 vehicles per day. The projections showed that in 2022 the flow would be 2400 vehicles per day and in 3037 it would be 2700 vehicles per day</p> <p>When they were first released, WPC queried the Old North Road figures and we were told that the reduction was because of the introduction of a 20mph limit in the centre of the village. The 20 mph limit was introduced the 2017 and in autumn 2021 WPC placed a vehicle counting camera on Old North Road. This showed a typical vehicle count of 3900 vehicles per day. At this time, government advice was to work from home as a result of the COVID-19 pandemic. It is not known how much difference that has made but at very least, traffic levels on Old North Road have remained at 2015 levels. They certainly have not reduced by 45%. The detailed vehicle counts from the camera have been given to NH and can be supplied to the Inspectorate if required.</p>	<p>Figure 4-2 shows Old North Road Northbound Traffic. Table 4-2 shows the AADT flow results for Old North Road and the A1 northbound off-slip based on the superseded assessment and Table 4-3 shows the results from the updated results from the TA. The current forecasts reported in the TA represents an opening year of 2025 and a design year of 2040, as opposed to the previous forecasts which represented 2022 and 2037. As it can be seen from this table, the results show that there are smaller differences between the base and the future forecast even though the forecasts represent later years. The reasons for the changes on Old North Road have already been explained above. Table 4-2 and Table 4-3 have also been provided in Annex A for ease of viewing.</p> <div data-bbox="1196 839 2007 1327" data-label="Figure">  <table border="1"> <caption>Old North Road NB Traffic Flow Data</caption> <thead> <tr> <th>Time Period</th> <th>2014</th> <th>2015</th> <th>2019</th> <th>2021</th> </tr> </thead> <tbody> <tr> <td>AM</td> <td>510</td> <td>450</td> <td>420</td> <td>140</td> </tr> <tr> <td>IP</td> <td>130</td> <td>130</td> <td>130</td> <td>130</td> </tr> <tr> <td>PM</td> <td>200</td> <td>200</td> <td>190</td> <td>130</td> </tr> </tbody> </table> </div> <p>Figure 4-2: Old North Road Northbound Traffic</p> <p>Table 4-2: AADT results superseded assessment</p>	Time Period	2014	2015	2019	2021	AM	510	450	420	140	IP	130	130	130	130	PM	200	200	190	130
Time Period	2014	2015	2019	2021																		
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Location	2 Way AADT BASE	2 Way AADT 2022 DM	2022 DM - Base	Difference	2 Way AADT 2022 DS	2 Way AADT 2022 Diff	2 Way AADT 2037 DM	2 Way AADT 2037 DS	2 Way AADT 2037 Diff	2037 DS - Base	Difference as %																																																															
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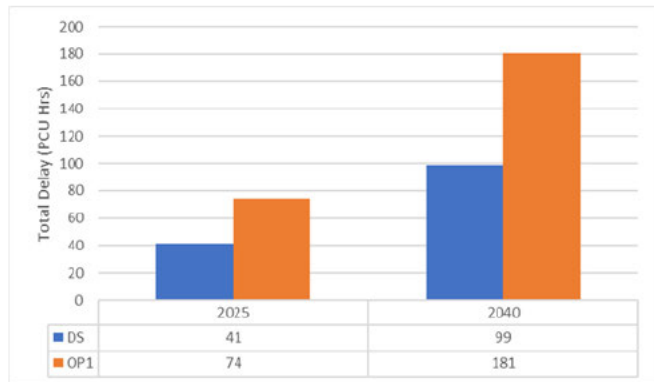


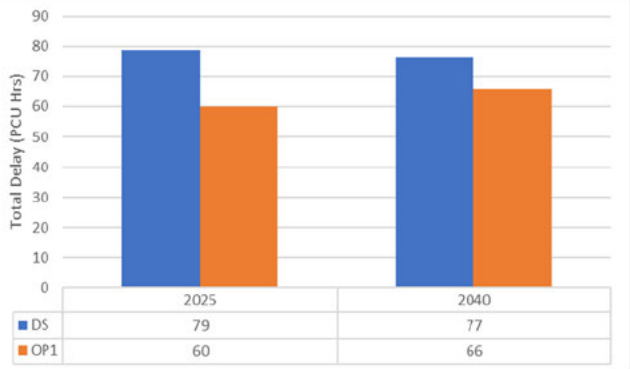
Reference	Written Representation	Applicant's Response
		<p>others due to the background growth as well as the re-routing of traffic.</p> <p>Therefore, a two-way AADT flow, which represents an average across 365 days of a year, is not directly comparable to a two-way observed vehicle flow which is specific to specific to a shorter time period (i.e. a one month period, or for weekdays only). The observed data analysis included above, which is based on the AM, IP and PM peak hours and is split by direction is critical.</p>
2.2	<p>Another reason given NH for the traffic reduction is that traffic would leave Wansford along Peterborough Road, join the A1 northbound and then leave again to on the northbound off slip to head east or west along the A47. To do this, vehicles would have to join a high speed trunk road from an access road that has no acceleration lane only to leave the trunk road some 275m later. This is an incredibly dangerous manoeuvre which should be discouraged. WPC has suggested closing off the A1 access at from Peterborough Road.</p> <p>The traffic volumes forecast to take this route are apparently based on the theoretical journey time but this shows the issues of modelling a situation which has not been reviewed on the ground.</p>	<p>The Applicant has discussed the possibility of closing the Peterborough Road exit with Peterborough City Council (PCC). However, with the subsequent omission of the improvements to the A1 northbound slip road (as explained in the Scheme Design Report (<b>AS-025</b>), the closure of the Peterborough Road exit is no longer proposed as part of the Scheme.</p> <p>As detailed in Section 6.6 of the TA (<b>REP2-025</b>), an operational VISSIM model has been developed based on local observed 2019 traffic count data. The 2019 VISSIM base year model achieved the DfT required validation criteria and is therefore considered fit for undertaking operational modelling. VISSIM Micro-simulation models include a representation of the movement of individual vehicles travelling across a highway network. This individual representation of driver behavior provides a suitable tool to assess the detailed impact of the Scheme.</p> <p>The Peterborough Road / A1 priority junction has been modelled using VISSIM conflict areas. This therefore means that a vehicle on the Peterborough Road minor arm will not enter the main carriageway unless there is a suitable gap in traffic flow.</p>

Reference	Written Representation	Applicant's Response
		<p>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.</p> <p>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 model 2040 is out of proportion with the overall increase in network congestion.</p> <p>It should be noted that the VISSIM modelling is a tool suitable for the operational assessment of junctions but it does not assess safety impacts.</p>
2.3	<p>The volume of traffic leaving Old North Road is a cross stream to the main easterly flows on the A47 and hence any increase in volume will have a major effect on that flow if it is going north up the A1 or east towards Peterborough.</p> <p>Because NH has used incorrect data in their junction modelling, the results of the modelling are wrong.</p> <p>The delays on the A47 eastbound and out of Old North Road will be greater than the modelling has shown.</p>	<p>The VISSIM and WTM are well calibrated for both the A47 (eastbound and westbound) and Old North Road traffic, thus the model replicates the base traffic with a good degree of validation in accordance with TAG. However, in the DM as the traffic on the A47 westbound increases the delays on Old North Road increase (i.e. giving priority at the roundabout to the circulatory traffic), this is shown in the VISSIM analysis above. When this situation happens in the DM then this reduces the attractiveness of Old North Road and as such traffic volumes decrease. As shown in the observed traffic from 2014 to 2021 above.</p> <p>With respect to the general modelling process it should be noted that, the WTM model is a WebTAG calibrated Wardrop user equilibrium assignment model using SATURN software, where all trips across the network will select the optimum route based on the generalised cost of travel between different ODs.</p> <p>Wardrop user equilibrium is based on the following proposition:</p>

Reference	Written Representation	Applicant's Response
		<p>'Traffic arranges itself on congested networks such that the cost of travel on all routes used between each origin-destination pair is equal to the minimum cost of travel and unused routes have equal or greater costs.'</p> <p>Thus, 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, the available roundabout capacity.</p> <p>As mentioned above, flows on Old North Road are constrained by the larger opposing westbound flow on the A47 which limits the availability of gaps in roundabout circulating flow. This lack of available capacity at the Wansford Western roundabout generates queuing along Old North Road. As discussed, this congestion along Old North Road is also a contributing factor to the decrease of traffic shown in both the VISSIM and SATURN modelling assessments.</p>
2.4	<p>As soon as we were aware of the issues with the input data, WPC consulted an experienced traffic modeler and their suggestion was that any modelling should include a sensitivity check to cover incorrect inputs. The suggestion was to take present day traffic flows and increase them all by 50% from 2015 to 2037. This suggestion was passed on to NH but from the modelling report it appears that only a single scenario was tested with no sensitivity tests.</p>	<p>As discussed above in 2.3. the input data for the base year model is correct and the models are well calibrated for both the A47 (eastbound and westbound) and Old North Road traffic, thus the model replicates the base traffic with a good degree of validation in accordance with TAG.</p> <p>However as explained above, due to the longer delays on Old North Road approach in the DM the volume of the traffic is expected to decrease. There is no strong reason given in WPC's commentary to suggest that traffic on the Old North Road should stay at the same level in the future scenario. Although it should be noted traffic is increasing along the A47 and the strategic</p>

Reference	Written Representation	Applicant's Response
		road network.
3 3.1	<p><b>3 An Alternative Approach to the Wansford Western Roundabout</b></p> <p><b>3.1 The Existing Roundabout</b></p> <p>The existing Wansford western roundabout has an internal diameter of 25m and an external diameter of 45m. This means that any vehicle not going in a straight line occupies the whole width of the road within the roundabout. A normal roundabout for this level of traffic has an internal diameter of 40m and an external diameter of 60m. This size of roundabout cannot fit into the village without purchasing a number of expensive properties.</p> <p>The traffic modelling report states that the western roundabout is already operating beyond its design traffic levels and this can only get worse with time.</p>	<p>As discussed in Section 7.9 of the TA (<b>REP2-025</b>) delay and queues are expected at the A47/A1 western roundabout in both the DM and DS scenarios. In particular, delays are forecasted on the A47 eastbound and Old North Road approach arms. However, the results do indicate that the DS scenario provides a relative improvement compared to the DM.</p>
3.2	<p><b>3.2 An Alternative Approach</b></p> <p>Knowing that there is a problem with the capacity of the existing roundabout, WPC took expert advice from a specialist in urban traffic junction design. After looking at the traffic flows, the advice was that a signalled junction would have a higher capacity than a roundabout of this size with or without signals on the roundabout. The traffic lights should be intelligent so that they adjust their periods depending on the length of the queue in each lane.</p> <p>An important part of this plan is to have the longest possible queuing length for vehicles doing each manoeuvre so that the signal periods can be quite long. That would particularly apply to the A47 eastbound and westbound entries into the junction.</p>	<p>Table 4-4 shows the results of the LINSIG junction assessment of the suggested traffic signal option for the A47/A1 western roundabout, which is contained broadly within the current highway boundary. It should be noted that the westbound approach arm is constrained by the existing A1 bridge.</p> <p><i>Table 4-4: LINSIG junction results</i></p>

Reference	Written Representation	Applicant's Response																																																																																																			
		<table border="1"> <thead> <tr> <th data-bbox="1193 266 1487 301">OP1 2025</th> <th colspan="2" data-bbox="1487 266 1715 301">VIC (%)</th> <th colspan="2" data-bbox="1715 266 1955 301">Delay (Seconds)</th> </tr> <tr> <td></td> <th data-bbox="1487 301 1599 320">AM</th> <th data-bbox="1599 301 1715 320">PM</th> <th data-bbox="1715 301 1827 320">AM</th> <th data-bbox="1827 301 1955 320">PM</th> </tr> </thead> <tbody> <tr> <td>A1 off slip (left turn lane)</td> <td>103%</td> <td>102%</td> <td>140</td> <td>136</td> </tr> <tr> <td>A1 off slip (all movement)</td> <td>103%</td> <td>102%</td> <td></td> <td></td> </tr> <tr> <td>A47 WB (ahead left turn lane)</td> <td>56%</td> <td>68%</td> <td>19</td> <td>17</td> </tr> <tr> <td>A47 WB (right turn lane)</td> <td>100%</td> <td>101%</td> <td>110</td> <td>110</td> </tr> <tr> <td>Old North Road (NB)</td> <td>101%</td> <td>49%</td> <td>148</td> <td>59</td> </tr> <tr> <td>A47 EB (ahead left turn lane)</td> <td>98%</td> <td>95%</td> <td>85</td> <td>65</td> </tr> <tr> <td>A47 EB (ahead right turn lane)</td> <td>98%</td> <td>93%</td> <td></td> <td></td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th data-bbox="1193 501 1487 536">OP2 2040</th> <th colspan="2" data-bbox="1487 501 1715 536">VIC (%)</th> <th colspan="2" data-bbox="1715 501 1955 536">Delay (Seconds)</th> </tr> <tr> <td></td> <th data-bbox="1487 536 1599 555">AM</th> <th data-bbox="1599 536 1715 555">PM</th> <th data-bbox="1715 536 1827 555">AM</th> <th data-bbox="1827 536 1955 555">PM</th> </tr> </thead> <tbody> <tr> <td>A1 off slip (left turn lane)</td> <td>127%</td> <td>99%</td> <td>451</td> <td>101</td> </tr> <tr> <td>A1 off slip (all movement)</td> <td>127%</td> <td>99%</td> <td></td> <td></td> </tr> <tr> <td>A47 WB (ahead left turn lane)</td> <td>70%</td> <td>88%</td> <td>21</td> <td>33</td> </tr> <tr> <td>A47 WB (right turn lane)</td> <td>110%</td> <td>97%</td> <td>235</td> <td>86</td> </tr> <tr> <td>Old North Road (NB)</td> <td>112%</td> <td>97%</td> <td>287</td> <td>145</td> </tr> <tr> <td>A47 EB (ahead left turn lane)</td> <td>96%</td> <td>99%</td> <td>78</td> <td>86</td> </tr> <tr> <td>A47 EB (ahead right turn lane)</td> <td>97%</td> <td>99%</td> <td></td> <td></td> </tr> </tbody> </table> <p data-bbox="1193 772 2029 938">Figures 4-3 and 4-4 show the comparison of the total junction delay for the proposed LINSIG assessment with ARCADY analysis of the existing situation. The flows utilised for both the ARCADY and LINSIG assessments are identical and are based on the SATURN DS core 2025 and 2040 scenarios.</p> <div data-bbox="1193 970 1845 1353">  <table border="1"> <thead> <tr> <th>Year</th> <th>DS</th> <th>OP1</th> </tr> </thead> <tbody> <tr> <td>2025</td> <td>41</td> <td>74</td> </tr> <tr> <td>2040</td> <td>99</td> <td>181</td> </tr> </tbody> </table> </div> <p data-bbox="1193 1358 1809 1385">Figure 4-3: Total Junction Delay (PCU Hours) – AM peak</p>	OP1 2025	VIC (%)		Delay (Seconds)			AM	PM	AM	PM	A1 off slip (left turn lane)	103%	102%	140	136	A1 off slip (all movement)	103%	102%			A47 WB (ahead left turn lane)	56%	68%	19	17	A47 WB (right turn lane)	100%	101%	110	110	Old North Road (NB)	101%	49%	148	59	A47 EB (ahead left turn lane)	98%	95%	85	65	A47 EB (ahead right turn lane)	98%	93%			OP2 2040	VIC (%)		Delay (Seconds)			AM	PM	AM	PM	A1 off slip (left turn lane)	127%	99%	451	101	A1 off slip (all movement)	127%	99%			A47 WB (ahead left turn lane)	70%	88%	21	33	A47 WB (right turn lane)	110%	97%	235	86	Old North Road (NB)	112%	97%	287	145	A47 EB (ahead left turn lane)	96%	99%	78	86	A47 EB (ahead right turn lane)	97%	99%			Year	DS	OP1	2025	41	74	2040	99	181
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	2025	2040									
DS	79	77									
OP1	60	66									

Reference	Written Representation	Applicant's Response
		<p>LINSIG software package to evaluate signal operation in peak hour congested traffic conditions. LINSIG calculates optimal signal settings based on fixed timings. In congested conditions, where all arms are experiencing queuing, these timings will minimise delay across the junction. Although other signal optimisation methods (such as MOVA) could improve the operation of the junction slightly, it will not resolve the peak hour congestion issues of the suggested signalised junction.</p>
	<p>Figure 2 shows the original layout of the A1/A47 junction before the roundabouts were installed in the late 1990s. This road layout has two lanes of traffic each way across the A1 bridge allowing a long queuing length for vehicles making the right turn onto the A1 northbound in the evening peak.</p> <p>The reason that a signalled junction can handle greater traffic volumes than a small roundabout when there is a lot of turning traffic is that the vehicles can move with closer spacing than a series of individual vehicles on a roundabout.</p> <p>WPC suggested that NH model this junction to see its capacity. NH agreed to this but instead of modelling the suggested signalling system they modelled fixed interval traffic lights with no intelligence. Even this showed a better performance than the roundabout.</p> <p>Certainly, the signalled junction will be much safer than an overloaded roundabout.</p>	<p>As stated in <b>Common Response D</b> of the Applicant's Response to Relevant Representations (<b>REP1-010</b>), consideration was given to the opening of two lanes westbound between the Wansford eastern and western roundabouts. However, a safety review undertaken did identify that two free flow lanes on the approach to the western roundabout increased the risk of collisions at the western roundabout.</p> <p>The suggested traffic signal option considered for the A47/A1 western roundabout, assessed in LINSIG, is contained broadly within the current highway boundary. As discussed above, it is considered that this proposed signalised junction option is not an appropriate solution to resolve the traffic congestion issues at the Wansford Western roundabout.</p> <p>As discussed above, the traffic signal assessment was based on fixed cycle time as optimised by LINSIG. Although other signal optimisation methods (such as MOVA) could improve the operation of the junction slightly, it will not resolve the peak hour congestion issues of the suggested signalised junction.</p> <p>In addition to this the analysis of the strategic WTM SATURN model indicates that the suggested signalised junction will decrease overall network performance across the wider area in</p>

Reference	Written Representation	Applicant's Response																											
		<p>the AM peak DS 2025 and 2040 scenarios and increase journey times.</p> <p>The overall average speeds extracted from SATURN are displayed in Table 4-5 below with:</p> <ul style="list-style-type: none"> <li>• DS representing the Do Something Core Scenario</li> <li>• SIG representing the Do Something Core Scenario including the signalization of the Wansford Western Roundabout</li> </ul> <p><i>Table 4-5: SATURN Simulation Network Overall Average Speed (km/hr)</i></p> <table border="1" data-bbox="1198 798 1966 1037"> <thead> <tr> <th>Scenario</th> <th>AM</th> <th>PM</th> </tr> </thead> <tbody> <tr> <td>2025 DS</td> <td>64.5</td> <td>63.1</td> </tr> <tr> <td>2025 SIG</td> <td>63.9</td> <td>63.2</td> </tr> <tr> <td>2025 SIG - DS</td> <td>-0.5</td> <td>0.1</td> </tr> <tr> <td>2025 SIG - DS % difference</td> <td>-0.8%</td> <td>0.1%</td> </tr> <tr> <td>2040 DS</td> <td>58.2</td> <td>56.2</td> </tr> <tr> <td>2040 SIG</td> <td>57.7</td> <td>56.7</td> </tr> <tr> <td>2040 SIG - DS</td> <td>-0.5</td> <td>0.4</td> </tr> <tr> <td>2040 SIG - DS % difference</td> <td>-0.9%</td> <td>0.8%</td> </tr> </tbody> </table> <p>There is a decrease in overall network speed in the SIG option compared to the DS in the AM peak by around 0.5 kph in 2025 and 2040 (2025: -0.8%, 2040 -0.9%). This indicates that the flow reassignment caused by the signal in the AM peak results in an overall reduction in network speeds.</p> <p>The 2025 PM peak overall speeds stay relatively consistent between the DS and SIG scenarios. Whereas the 2040PM peak average speeds show a relative improvement in the SIG option.</p>	Scenario	AM	PM	2025 DS	64.5	63.1	2025 SIG	63.9	63.2	2025 SIG - DS	-0.5	0.1	2025 SIG - DS % difference	-0.8%	0.1%	2040 DS	58.2	56.2	2040 SIG	57.7	56.7	2040 SIG - DS	-0.5	0.4	2040 SIG - DS % difference	-0.9%	0.8%
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Reference	Written Representation	Applicant's Response
		<p>This alternative proposal presents a greater safety risk to the road user than a roundabout. This is based on multiple research papers and experience across the globe including:</p> <ul style="list-style-type: none"> <li> <p><i>The safety of roundabouts and traffic lights in Belgium</i> by Walloon Ministry of Equipment and Transport in 2003</p> <p>[REDACTED]</p> <p>[REDACTED] that identified roundabouts in an urban environment have a 20 to 25% less injury collisions. In open country this difference can be twice as much.</p> </li> <li> <p>In the United States of America research by the Insurance Institute for Highway Safety and Federal Highway Administration has shown a 37% reduction in overall collisions, 75% reduction in injury collisions and 90% reduction in fatality collisions for roundabouts versus traditional stop line or traffic controlled interchanges.</p> <p>[REDACTED]</p> <p>[REDACTED]</p> </li> </ul> <p>Knowledge of collision types and injury severity at junctions across the United Kingdom suggests similar outputs, with the significant factor being that an overshoot of a vehicle at a roundabout will generally result in a side swipe due to the entry geometry. However, a similar collision type on a traffic signal controlled crossroads may result in a "T-bone" whereby a vehicle can be struck side-on resulting in a greater risk of injury and resultant injury severity.</p>
4	<p><b>4 The Long Term Solution</b>          The only long term solution to the problems of the A1/A47 junction is to realign the A1 with a completely new junction. This</p>	<p>This A1 realignment proposal is outside the scope of the Scheme.</p>

Reference	Written Representation	Applicant's Response
	<p>was planned in 1994 but never happened. This realignment could also include a new bridge over the Nene as the existing southbound bridge has structural problems.</p> <p>An important outcome of this DCO process could be a recommendation that the upgrading of this stretch of the A1 is brought forward in the national roads programme.</p>	<p>However, these comments are noted.</p>

## 5 HISTORIC ENGLAND (REP2-074)

Reference	Written Representation	Applicant's Response
1.0	<p>1.1 The Historic Buildings and Monuments Commission for England (HBMCE) is better known as Historic England, and we are the Government's adviser on all aspects of the historic environment in England - including historic buildings and areas, archaeology and historic landscape. We have a duty to promote conservation, public understanding and enjoyment of the historic environment. We are an executive Non-Departmental public body and we answer to Parliament through the Secretary of State for Digital Culture, Media and Sport (DCMS).</p>	No response required.
	<p>1.1. The development would be for a new 2.6 km section of dual carriageway on the A47 from Wansford in the west to Sutton in the east, including additional infrastructure and connecting roads.</p> <p>1.2. As set out in our S.56 response we are aware the proposed development lies in a highly sensitive area for the historic environment and will have a direct impact upon one scheduled monument and is within the setting of a range of other high value heritage receptors.</p> <p>1.4. Historic England has been engaged in pre-application discussions with the applicant's heritage consultants at and before the Scoping Opinion Stage of the proposals and our engagement is summarised in Section 6.4.10 of Chapter 6.1 and elsewhere in the Environmental Statement (ES).</p> <p>1.5. The applicant has provided a full ES with a Cultural Heritage chapter (see Chapter 6) which includes the results of geophysical surveys and archaeological trial trenching.</p>	No response required.

Reference	Written Representation	Applicant's Response
	<p>1.6. Historic England considers the baseline data provided in the Cultural Heritage Chapter of the ES and its appendices, to be suitable for this assessment. The list of designated and non-designated heritage assets set out in Appendix 6.1 (Cultural Heritage information) are likewise appropriate. Similarly, we consider the methodology used to assess the cultural heritage datasets within Chapter 6 is sufficient for this development.</p> <p>1.7. We note the ES has identified 12 key designated heritage assets with a potential to experience significant effects and one non-designated heritage asset. We confirm this accord with our own assessment of the heritage receptors that are likely to be most affected by the scheme. Of those, the following are within the remit of Historic England for comment.</p> <ul style="list-style-type: none"> <li>• Scheduled monument known as the 'Cropmark site of a barrow cemetery and a quadrilateral ditched enclosure, together with pits and a pit alignment, approximately 837 msouth-east of Sacrewell Farmhouse. (LEN 1006796)</li> <li>• Scheduled monument of Wansford Bridge (LEN 1006835) also listed at Grade I</li> <li>• Grade II* listed Sacrewell Mill, Mill House and stables (LEN 1127493)</li> <li>• Grade I listed Churches of St Michael at Sutton (1127517), Church of John the Baptist at Upton (LEN 1127440) and the Church of John the Baptist, Wansford (LEN 1127440)</li> <li>• Conservation Areas of Thornhaugh, Stibbington and Sutton</li> </ul> <p>Advice on grade II buildings, non-designated assets and</p>	

Reference	Written Representation	Applicant's Response
	<p>archaeological matters will be provided by Peterborough District Council's Conservation and Archaeological Teams and are not considered further within this written representation.</p> <p>1.8. We will also provide comments on the non-designated but significant locally listed building known as,</p> <ul style="list-style-type: none"> <li>• Wansford Road Railway Station (ES References 53529, WAN1, WAN2, WAN11)</li> </ul> <p>1.9. We also note the applicant has provided detailed analysis of the significance of heritage assets (see Table 4: Assessment of Value &amp; Sensitivity) and impact (Table 5: Assessment of Impacts) in Appendix 6.1 Cultural Heritage Information.</p> <p>1.10. We broadly support the conclusions reached in the ES for the majority of the assets considered. However, Historic England have expressed concerns about the use of matrices to assess impacts and harm, particularly in relation to the translation of language around the significance of impacts from EIA assessment to the language used in Planning Policy documents such as the NPPF and the NPSNN. We have therefore provided additional narrative in relation to a small number of assets below.</p>	
2	<p><b>2. Designated Heritage Asset: Barrow Cemetery Scheduled Monument</b></p> <p><b>Introduction</b></p> <p>2.1 Historic England's primary consideration in relation to this development, is the impact upon the scheduled monument known as 'Cropmark site of a barrow cemetery and a quadrilateral ditched enclosure, together with pits and a pit alignment, approximately 837m south-east of Socrewell</p>	No response required.

Reference	Written Representation	Applicant's Response
	<p>Farmhouse' List Entry Number 1006796 (See also ES Chapter 6.6.8).</p> <p>Significance</p> <p>2.2 This is the buried remains of up to seven prehistoric burial sites known as ring ditches or ring barrows. The scheduled monument also includes settlement evidence such as the quadrilateral enclosure, and also a number of smaller, overlapping single-ditched enclosures, and a prehistoric pit alignment. All of these remains are only visible as cropmarks on aerial photographs. Although there is no surface expression of these features, there will be extensive and well-preserved archaeological features present below the plough soil.</p> <p>2.3 The ring ditches are believed to represent the buried remains of a Bronze Age round barrow cemetery, which is one of the largest and most significant grouping of burials in the area. The enclosures are believed to relate to the use of the land as a farmstead in a later period of prehistory and into the Roman Period. Together they show a continuity of activity in the landscape over several millennia.</p> <p>2.4 The ring ditches vary considerably in size and complexity. The smallest one is some 15 m diameter and has a single large ditch around the outside. There are also several more complex burials within the group, that include a large ring ditch in the middle of the cemetery some 40 m wide, with evidence of internal features.</p> <p>2.5 There is also a barrow that sits immediately adjacent to the A47 in the south western area of the scheduled monument. This is also a complicated double ring ditch, which is both unusual and rare in its own right. The ES Chapter 6 describes the significance and survival of this feature well and provides</p>	

Reference	Written Representation	Applicant's Response
	<p>excerpts from the geophysical surveys (see 6.6.8- 6.6.10 and Captions land 2).</p> <p>2.6 The features on Toll Bar Field sit on a terrace above the northern side of the river Nene which rises gently away from the northside of the existing A47. The road forms the southern boundary of the scheduled monument. The site is bounded by a stream to the north (now part of the tail race for Sacrewell Mill), which joins a stream to the east of the site. These then flow as a small tributary down to the Nene. The cemetery, and then the later period settlements, were situated across a naturally draining area of land at the confluence of these streams and overlooking the river. Locations such as this have long been chosen as the focus for prehistoric burial activity.</p> <p>2.7 The list entry for the monument was reviewed in 2018 and the site has been subject to a geophysical survey which is reproduced in the ES (see Appendix 6.5). The research undertaken for the review of the designation, combined with the geophysical survey has confirmed the presence of the prehistoric cemetery. The review of the designation has also resulted in the designated area being extended to the north and it now includes the full extent of the known settlement. The survey reproduced in appendix 6.5 shows the former smaller area of the monument prior to its extension in 2018</p> <p>2.8 The remains found here are designated for the following reasons. These are also set out in the list entry,</p> <ul style="list-style-type: none"> <li>• Period: the round barrow cemetery and ditched enclosure demonstrate a significant sequence of development throughout the late prehistoric and Romano-British periods and offer an important understanding of the economic and social activities</li> </ul>	

Reference	Written Representation	Applicant's Response
	<p>within the area during the period of occupation;</p> <ul style="list-style-type: none"> <li>• Survival: despite having previously subject to ploughing, aerial photographs and geophysical (magnetometer) survey have shown that archaeological features survive as buried deposits;</li> <li>• Potential: deposits in the infilled ditches and the buried land surface will preserve important archaeological information relating to the construction and use of the site, as well as the impact of prehistoric and Roman occupation on the wider landscape;</li> <li>• Finds: the abundance of Romano-British finds recovered from the site, all indicate a prolonged period of occupation;</li> <li>• Group value: a study of the monument and its relationship to other prehistoric and Roman sites in the area will make a valuable contribution to the understanding of later prehistoric occupation and funerary activity in the Nene Valley, along with civil and military control during its Roman occupation</li> </ul> <p>2.9 The monument has been designated since its discovery in 1962, and although there have been many other important archaeological discoveries in the area, this site is still one of the larger groups or clusters of surviving prehistoric burials and is an archaeological asset of national importance. We confirm our view that the asset holds high heritage values in relation to historical, evidential and social value and has a high overall significance.</p>	
	<p><b>Impact</b></p> <p>2.10 As set out in the ES, the impact of the development on the scheduled monument has largely been avoided. This is</p>	<p>The Applicant is in broad agreement with this statement. The assessment of residual effect on setting is not quite in line with the assessment presented in the ES Chapter 6 Cultural Heritage (<b>REP2-010</b>) (Section 6.7.10-11). The Applicant believes the</p>



Reference	Written Representation	Applicant's Response
	<p>through mitigation by design. The new dualled route primarily follows the line of the existing road, and the new carriageways would be built to the south of the existing road. The road corridor and the development boundary respects for the most part the southern edge of the monument and avoids impacts upon it.</p> <p>2.11 In particular the works would avoid the southern most of the ring ditches. This is one of the more important features in the cemetery group (see ES Chapter 6.6.8- 6.6.10 and Captions 1 and 2), and the avoidance of impacts on this particular barrow was an important design and mitigation consideration, which we have supported.</p> <p>2.12 As set out in the ES (see 6.6.8 and 6.7.10) a small triangular section of the scheduled monument measuring 6 m x 9 m or some 27 m<sup>2</sup> is within the red line boundary. This is a small but direct impact upon the monument which would result in a permanent change. As set out in the ES, there are no known features of high evidential or archaeological significance in this part of the scheduled monument.</p> <p>2.13 Because it is small but direct impact, we consider that in regard to the EIA process it is still a significant effect and would represent harm to a designated heritage asset in terms of planning Policy. The degree of harm would, in our view, be less than substantial in nature.</p> <p>2.14 The changes to the road corridor would also have the potential to result in a small change to the significance of the asset through a development within its setting. This is from an erosion of the rural setting of the monument to the south and an increase in the separation of the river and monument. We would also consider that this impact would need to be</p>	<p>apparent difference is a fine point of definition and there is common ground to be easily reached in this regard. The Applicant will pursue this through the Statement of Common Ground with Historic England.</p>

Reference	Written Representation	Applicant's Response
	<p>considered as a harmful residual effect in EIA terms. But again, the degree of harm to the significance of the asset from changes to its setting is less than substantial in nature and at the lower end of the spectrum.</p>	
	<p><b>Policy</b></p> <p>2.15 The avoidance of direct impact on designated assets is an important principle and direct impacts on scheduled monuments are rare. Policy directs us towards sustaining and enhancing assets (see NPSNN 5.130) and great weight is given to their conservation in decision making (see NPSNN 5.131). Likewise, any impacts, significant effects or harm need clear and convincing justification (NPSNN 5.131).</p> <p>2.16 In addition, Para 5.132 recognises that 'any' harmful impact on the significance of a designated heritage asset should be weighed against the public benefit, and that the greater the harm, the greater the justification that will be needed. In this case policy 5.134 is also relevant in that 'Where the proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal...'</p> <p>2.17 The 2021 version of the National Planning and Policy Framework (NPPF) is also relevant in relation to the principles required to test this development. In particular, it establishes a presumption in favour of sustainable development in the planning system (paragraphs 7, 8, 10 and 11) which also identifies protection of the historic environment as an important element of achieving sustainable development. Further policy principles relating to the historic environment are set out in Chapter 16 of the NPPF,</p>	<p>Historic England are included within the wording of commitments CH2, CH3, CH6 and CH7 in the Record of Environmental Actions and Commitments (REAC) of the (Environmental Management Plan (EMP) (<b>REP2-027</b>), Table 1.4. Requirement 9 of the dDCO refers to the REAC. Historic England shall be included in this matter as stated in the REAC and as advisors to the Secretary of State.</p>

Reference	Written Representation	Applicant's Response
	<p>2.18 Paragraph 199 requires the planning authorities to place 'great weight' on the conservation of designated heritage assets, and states that the more important the asset the greater the weight should be, 'this is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.</p> <p>2.19 Paragraph 200 States that 'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification'.</p> <p>2.20 Paragraph 202 states that where a development proposal will lead to 'less than substantial harm' to the significance of a designated heritage asset, this harm should be 'weighed against the public benefits of the proposal... '.</p> <p>2.21 Paragraph 203 also goes on to state states that 'the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'</p> <p><b>Historic England Position</b></p> <p>2.22 We confirm our view that the Scheduled Monument has very high heritage values, is of national importance, and therefore direct impacts and impact upon the setting of the asset should be avoided as far as possible.</p> <p>2.23 During pre-application discussions the stated objective of the applicant, and therefore the primary mitigation, was through a design led approach that sought to keep the road on</p>	

Reference	Written Representation	Applicant's Response
	<p>the same alignment as the existing carriageway. This avoided all direct impacts upon the scheduled monument, and we have supported this approach.</p> <p>2.24 During the later stages of the pre-application process a design modification was put forward which placed a small triangular section of the scheduled monument within the scheme's development boundary. This design modification allowed a re-alignment of the new road to the east which, in turn resulted in a smaller footprint of the scheme within the floodplain of the river Nene.</p> <p>2.25 Historic England understands from discussions with the applicant that this would result in a significant reduction in the environmental impact of the development upon the floodplain of the Nene and this meaningfully reduces the land that would need to be acquired for the scheme. Justification for this impact, and in particular for this element of the scheme are provided in the ES.</p> <p>2.26 We are therefore aware that this change in alignment, if consented, would result in small but direct residual impact on the scheduled monument. The proposed intervention would avoid the areas that are of higher evidential and historical value (and one of the most important barrows in the group) and the overall significance of the scheduled monument would be retained. The ES states the mitigation for loss if consented would be through excavation of the impacted area and public dissemination of the results.</p> <p>2.27 We have therefore concluded that although this is a significant effect, the degree of harm is less than substantial in planning policy terms</p>	

Reference	Written Representation	Applicant's Response
	<p>2.28 We have also considered the impact of the development upon the significance of the asset through a change in its setting. Although there will be a clear change in the setting of the asset, we do not consider this will greatly affect or increase the effects or the level of harm to the asset overall.</p> <p>2.29 As is set out in the NSPNN we are aware it is for the Examining Authority (ExA) to weigh that balance in relation to the harm and benefit. The ExA would therefore need to be content that the benefits would outweigh the harm and that the impact can be justified in terms of those tests set out in NPSNN. We do not consider policy 5.1.33 would apply in this case, and therefore the Secretary of state would need to have regard to polices 5.130, 5.132 and 5.134 in the decision-making process. In terms of the NPPF this is also set out in paragraphs 200 and 202.</p> <p>2.30 As noted in 6.7.10, Historic England have requested that evidence is provided to show that the impact upon the monument is justified by the reduction in environmental impact elsewhere on the scheme and by the scheme itself. We have been reassured this is the case, and that this information and the resulting public benefits of the scheme are set out fully in the ES. We can confirm that this is also signposted in the heritage chapters.</p> <p>2.31 Given a small area of the monument is within the scheme boundary, the DCO will take the powers of the 1979 Ancient Monuments and Archaeological Areas Act (The 1979 Act). The ExA would therefore need to be content that the provision for archaeology within the DCO is sufficient to ensure this archaeological work is discharged appropriately Act.</p>	

Reference	Written Representation	Applicant's Response
	<p>2.32 At present however we are concerned the DCO provisions does not reference Historic England and we consider this is a matter that would need to be amended or clarified prior to approval.</p>	
<p>2.33</p> <p>2.34</p> <p>2.35</p>	<p><b>Conclusion</b></p> <p>2.33 We have concluded that the development would result in a small direct and residual impact upon the monument. This would be a significant effect and in policy terms would result in harm to a designated heritage asset. We have however concluded this would be less than substantial in nature, for the reasons given above.</p> <p>2.34 We can confirm that we accept the design adopted by the applicant in relation to this asset, and the position with regards to impacts. In doing so we have considered both the direct impact upon the monument and changes that would occur to its setting.</p> <p>2.35 The wording of the DCO provision does not reference Historic England. This remains a concern going into the examination.</p>	<p>See above responses to Section 2.</p>
<p>3</p> <p>3.1</p>	<p><b>3.0 Other Designated Heritage Assets</b></p> <p><b>Sacrewell Mill Significance</b></p> <p>3.1 The complex at Sacrewell Mill, consists of the mill, the Mill House and stables wing (LEN 1127493) which are listed at Grade II*. The buildings represent a well preserved early 18th Century mill, with the house joined at right angles to the mill with a stable wing to the north. The complex is roofed in the famous Collyweston stone slates.</p>	<p>No response required.</p>

Reference	Written Representation	Applicant's Response
3.2	<p>3.2 This is a fine set of buildings, and the intact nature of the mill, complete with working mill machinery, cast iron overshot wheel, wheel pit, and internal machinery makes this an additionally rare and important heritage asset. Its importance is enhanced through its association with the Sacrewell Farm visitor centre, which provides public access to the mill. The mill therefore derives significance from high evidential, historical, aesthetic values. Its accessibility to the public adds high social and communal attributes to the value of this asset.</p>	
3.3	<p>3.3 The group derives additional significance from its informal setting which includes the mill yard and lane, and its associated waterbody. This includes the mill stream and mill pond to the east of the main building, and the tail race which is downstream of the mill to the west.</p>	
3.4	<p><b>Impact</b></p> <p>3.4 There is no impact from the development upon either the buildings or the stream and water bodies that are integral to the mill. These run primarily east to west and are not in area affected by the development. The dualling works however mean that a new southern access and underpass is required to Sacrewell Farm and the Mill, which would be from the new Wansford East roundabout.</p>	No response required.
3.5	<p>3.5 The ES rightly concludes there would be impacts during construction and although adverse, would be temporary. There would however also be some permanent changes to its setting from the development. Our primary consideration is therefore the impact of the development upon the significance of the mill from residual changes within its setting.</p>	

Reference	Written Representation	Applicant's Response
3.6	<p>3.6 We have assessed the mill and although the site is screened by mature trees, we are of the view the changes to the area to the south of the farm are likely to result in a localised erosion of the rural and agricultural setting of the mill. This would be exacerbated by the changes to the southern approach for which a new modern underpass is required. This land and the southern access contributes to the setting of the asset and therefore the changes have the potential to be harmful in policy terms.</p>	
	<p><b>Policy and Position</b></p> <p>3.7 In relation to this asset, we consider the primary consideration would need to be given to sustaining and enhancing assets, including the 'contribution of their settings' (see NPSNN 5.130). In addition, great weight is given to their conservation in decision making (see NPSNN 5.131), and this policy goes on to say that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Likewise, any impacts, significant effects or harm need clear and convincing justification (NPSNN 5.131).</p> <p>3.8 In terms of the assessment Historic England can confirm that we are broadly in agreement with the applicant's assessment of this assets as set out in Chapter 6.7.17 and Table 6.6. and agree with the conclusion that the harm to this asset would be worse during construction.</p> <p>3.9 We have however concluded there would also be a modest residual impact and effect from the permeant changes to the road network south of the buildings, and through a small loss of its setting. This is through changes to the way in which the asset would be approached from the south. In our view,</p>	<p>Setting impacts on Sacrewell Mill and Mill House and Stable are addressed in sections 6.7.17, 6.8.24 and Table 6.6 in ES Chapter 6 Cultural Heritage (<b>REP2-10</b>). The Applicant acknowledges the difference in the assessment and will pursue this in the Statement of Common Ground.</p>



Reference	Written Representation	Applicant's Response
	<p>this is likely to result in some harm to the significance of this highly designated asset. Overall however this would however be a relatively modest level of harm and at the lower end of less than substantial.</p> <p>3.10 Again, we do not consider policy 5.1.33 would apply in this case, and therefore the Secretary of state would need to have regard to polices 5.130, 5.132 and 5.134 in coming to a decision. Given the policy considerations the ExA would therefore need to be content that the benefits outweigh the harm and that the impact can be justified in terms of those tests set out in NPSNN.</p>	
	<p><b>Wansford Bridge (LEN 1006835)</b></p> <p>3.11 Wansford Bridge is both a Scheduled Monument and is listed at Grade I. It is a fine limestone bridge which formerly carried the Great North Road over the River Nene. Consisting of twelve arches; and dating variously to c. 1577 and repaired in 1674, 1672 and 1795. It replaced an earlier wooden bridge and continued as the main road bridge until the village was bypassed in 1929.</p> <p>3.12 Although of high significance and dual designated, the assessment work has identified the asset would not be visible either to or from the development and therefore the effect of the proposal would not be significant in EIA terms. We can confirm that we support this conclusion provided by the applicant and do not have any further comments in this regard.</p>	<p>These comments are noted.</p>
	<p><b>Churches and Conservation Areas</b></p> <p>3.13 We confirm we have also considered the Grade I listed churches at Sutton, Upton and Wansford and the Conservation Areas of Thornhaugh, Stibbington and Sutton. We note their</p>	<p>These comments are noted.</p>

Reference	Written Representation	Applicant's Response
	<p>significance as designated heritage assets, but we do not have any further comments regarding these assets at this time.</p>	
4	<p><b>4.0 Non-Designated Heritage Asset - Wansford Road Station Significance</b></p> <p>4.1 As set out in the ES (chapter 6.6.61) the A47 currently passes over a disused section of the former Stamford to Wansford railway line. The railway opened in February 1857 and was originally designed to connect the area between Stamford and Wansford to the London and North Western Railway line. Commercially challenged, heavily opposed by the adjoining Midlands line and beset with issues it eventually closed in 1931. The route had 4 stations located at Barnack, Ufford, Wansford Road and Wansford.</p> <p>4.2 A small section of the disused line which includes the former Wansford Road Railway Station is within the scheme boundary. Built in 1867, the station is constructed from local limestone, it comprises a single storey central station building with side extensions. It is locally listed (see ES reference WANI), and the station group also includes a large section of the original platform, the original gates and gate piers at the road access from the A47, and a contemporary linesman's hut.</p> <p>4.3 The group is completed by a second locally listed structure, which is a road bridge (ES reference WAN2). This asset is described in the ES as an 'excellent example of a skew arch bridge with a five-ring brick barrel displaying fine workmanship throughout. The asset is built of local limestone in a rusticated finish with red brick detailing'.</p> <p>4.4 Although this is a very good group of railway assets</p>	<p>The Applicant's understanding is that Heath House, the former station building and bridge are locally listed. The platform, gate and gate piers, linesman's hut and track/cutting are not described specifically in the local list descriptions. However, the assessment uses the precautionary principle that those assets are part of the curtilage of the locally listed assets and therefore benefit from the same consideration. The Applicant is aware that the PCC local list is currently under revision.</p> <p>In this instance "curtilage" is used in the natural language sense and not in any particular policy context.</p>

Reference	Written Representation	Applicant's Response
	<p>with high heritage value, they were assessed for designation in 2018 by Historic England and did not to meet the test to be added to the National Heritage list. The station for example had been much altered when converted into a dwelling and in the 80 or so years between the station closing and the designation review. The bridge and other assets were also deemed not sufficiently unusual.</p> <p>4.5 Former rail infrastructure does have considerable public interest and has strong communal and social values. The station buildings, the bridge, the railway line, the intact section of platform, linesman's hut, the gates and gate piers, make a good collection of interrelated contemporary railway assets with both group value and a degree of significance.</p> <p>4.6 Although the station and bridge are not formally recognised on the National Heritage List they have been identified as important and placed on the local list maintained by the Local Planning Authority. They are therefore defined for the purposes of this assessment as Non-designated Heritage Assets (NDHA).</p> <p>4.7 Because of the interrelated and contemporary nature of the railway infrastructure, the route and cut for the railway line, sections of platform, linesman's hut, gates and gate piers form a part of the setting of the locally listed NDHA's. They contribute positively to the significance of the NDHA's and enhance their value.</p> <p>4.8 We note a degree of ambiguity in relation to the status of the former railway line, the hut, platform, gates and gate piers as to their status as locally listed assets or as non-designated heritage assets and we agree that clarification from the LPA as to their status would be useful to support this</p>	

Reference	Written Representation	Applicant's Response
	examination.	
	<p><b>Impact</b></p> <p>4.9 The development requires total demolition of the station building, part of the platform, and the demolition and removal of the gates and gate piers. The ES (see 6.6.8) notes a section of the platform and linesman's hut could be retained in situ. The demolition of the bridge is not part of the development and the general arrangement plans (ES Chapter 2.6, Sheet 4) shows the bridge would be retained and used as a maintenance and access track and cycle path. The route of the former railway line would also be retained.</p> <p>4.10 The works would therefore result in a total loss of significance of the station building. We consider this to be a detrimental residual effect in EIA terms which is equivalent to substantial harm in planning policy terms, albeit for a NDHA.</p> <p>4.11 The loss of a part of the platform, and removal of the gates and gate piers represent a total loss of significance for these features and would also be a significant effect and harmful in policy terms. As they also form part of the setting and contribute to the significance of the non-designated assets (station and bridge), their removal would therefore also result in a harm to the significance of the NDHA's from a loss of features that contribute positively to their setting.</p>	See responses in Section 4 above.
	<p><b>Policy</b></p> <p>4.12 The work proposed at this location is set out in the ES and the justification is provided and signposted in the heritage chapter. In policy terms the NPSNN as a more senior policy document does not provide much detail with regards to non-</p>	These comments are noted.

Reference	Written Representation	Applicant's Response
	<p>designated heritage assets and for example paragraph 5.131 &amp; 5.133 refer only to designated heritage assets.</p> <p>4.13 The 2021 revised version of the NPPF is however more helpful in direction with regard to this situation and for example paragraph 203. States that, '...the effect of on application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'</p> <p>4.14 Paragraph 5.139 of the NPSNN does however state that, 'A documentary record of our past is not as valuable as retaining the heritage asset and therefore the ability to record evidence of the asset should not be a factor in deciding whether consent should be given.'</p> <p>4.15 NPSNN 5.140 also says that, 'Where the loss of the whole or part of a heritage asset's significance is justified, the Secretary of State should require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part). The extent of the requirement should be proportionate to the importance and the impact.'</p>	
	<p><b>Historic England's Position</b></p> <p>4.16 We note these features are primarily outside of Historic England's remit and we recommend the ExA take into consideration the views of the Councils specialist Conservation team with regards to this asset group.</p>	<p>The mitigation proposals set out in ES Chapter 6 Cultural Heritage (<b>REP2-10</b>) section 6.8.6 to 6.8.9 and table 6.6 include all parts of the removed structures, including the gate piers. This is echoed in commitments CH3 and CH4 of the REAC of the EMP (<b>REP2-027</b>).</p>

Reference	Written Representation	Applicant's Response
	<p>4.17 We do however consider that together they form a good grouping of railway related infrastructure and they have retained heritage values and significance as heritage features albeit in a local context. The loss of significance for some assets would be total, and there would be additional harm to the setting of the retained assets. In our view this loss and the harm to the significance of the remaining assets from the development within their setting is regrettable but accept it is unavoidable.</p> <p>4.18 We note the applicant has made provision for recording these assets (see ES 6.8.6, and 6.8.7). We would consider this an appropriate response to satisfy NSPNN paragraph 5.140, as would an approach that seeks to recover original building materials during demolition (as set out in the ES see chapter 6.8.9). We consider this should also include the gates and gate piers and platform materials.</p> <p>4.19 As set out in NSPNN paragraph 5.139 this response is not as 'valuable' as retaining the asset and would not makeup for the overall loss of significance and heritage values.</p> <p>4.20 The ExA would therefore need to give consideration to the policies set out in the NPSNN at 5.139 &amp; 5.140, and we also recommend that regard is given to paragraph 203 of the NPPF when coming to a decision.</p> <p>4.21 We do however wish to note that discussion are on-going between the applicant (as owner of the station group) and other local parties with regard to controlled demolition and relocation of a number of assets in the Station building group. Including the main Station building itself.</p>	<p>Third party actions noted in paragraphs 4.22 and 4.23 are not considered in the assessment of impact as this would be a separate project. Although the Environment Designated Fund (EDF) funding decision rests with National Highways, the responsibility for delivery would rest with the successful third party and not National Highways.</p> <p>The EDF decision process is not yet concluded and so, cannot be commented on in detail at this time. However, the Applicant can state that a preferred party has been identified to take the application forward, pending clarification of details and conditions.</p> <p>Should no EDF funded project be approved, the recording and demolition would progress as proposed. The materials would still be offered for salvage to appropriate groups or disposed of in line with the waste management plan (<b>APP-121</b>) if no such group is identified.</p>

Reference	Written Representation	Applicant's Response
	<p>4.22 In our view If this course of action, namely recording, careful demolition and rebuilding (we recommend this includes the gates, gate piers and platform) could be secured, then some elements of the significance of the buildings would potentially be retained. Again, we recognise this is not as valuable as retaining the assets in situ. It is however arguable that the overall heritage harm and the negative effects would be reduced if this approach was successful, and some significance would be vested in the building at a new location. Provided this location allowed for public access and interpretation.</p> <p>4.23 We therefore consider that the applicant should be asked to provide further details to the ExA in relation to this matter. In particular, confirmation is required that this outcome is available to the applicant and details of the mechanism by which it would be secured, as per paragraph 204 of the NPPF.</p>	
5	<p><b>5.0 Written Scheme of Investigation (WSI) and Development Consent Order (DCO)</b> <b>WSI</b></p> <p>5.1 The Cultural Heritage Chapter of the ES (Chapter 6) identifies a wide range of non-designated heritage assets within the DCO application boundary and wider study area. The archaeological surveys already undertaken have identified previously unrecorded buried archaeological remains and a high potential for other non-designated heritage assets and archaeological deposits to be present within the application site boundary.</p> <p>5.2 Advice regarding the impact of the proposed scheme on non-designated archaeological heritage assets is being provided by Peterborough City Councils archaeological</p>	<p>Historic England have been added as consultees in Requirements 4 and 9 of the dDCO.</p> <p>These comments are noted.</p>

Reference	Written Representation	Applicant's Response
	<p>specialists. However, Historic England retain an appropriate interest in the small area of the scheduled monument that is within the application boundary, as well as other non-designated archaeological heritage assets also within the boundary. This is in our capacity as a provider of specialist archaeological science advice to the both the Council's Archaeological Advisors and to the Applicant and their Archaeological Consultants and Contractors. We accept that approval of the scheme WSI is however primarily a matter for the LPA and their archaeological advisors.</p> <p>5.3 Consequently, we confirm our view that should consent be granted then Historic England would need to be consulted on the draft Environmental Management Plan and the Archaeological Written Scheme of Investigation. We note the WSI has not yet been produced, however the applicant has stated in the ES(see 6.8.14 to 6.8.20) that Historic England will be a consultee in drawing up the protocol.</p> <p>5.4 In relation to 6.8.18, Historic England would normally anticipate an Outline WSI to have been supplied with the ES. This is in order to provide structure and chapter headings for a subsequent scheme specific detailed WSI. We note that PCC has stated that they would prefer archaeological WSI to be written by the appointed archaeological contractor. Given this approach we would be content for this work to be managed post determination provided the ExA and PCC are content there are sufficient safeguards within the DCO wording to ensure the delivery of a full archaeological mitigation strategy.</p>	
	<p><b>DCO wording</b></p> <p>5.5 Given the discussion set out in our advice above in</p>	<p>The Applicant has amended Requirements 4 and 9 of the dDCO to include Historic England as a consultee</p>



Reference	Written Representation	Applicant's Response
	<p>relation to the impact upon the Scheduled Monument, we are aware the DCO if granted would assume the statutory powers for consenting works to a Scheduled Monument.</p> <p>5.6 Under Chapter 6 of the ES it is noted that Historic Buildings and Monuments Commission for England or Historic England should be a consultee on the Environmental Management Plan. Given that works will be undertaken within the Scheduled Monument we would consider this approach as appropriate.</p> <p>5.7 We would however anticipate that this also needs to be reflected in the wording of the DCO at Schedule 2. We are not a named party in the DCO nor noted in Schedule 2, and furthermore the DCO does not acknowledge either the Historic Buildings and Monuments Commission for England or Historic England.</p> <p>5.8 In our view the archaeological provision in the DCO would need to be rectified with amended wording to address this matter and we recommend the ExA seek further information from the applicant in this regard.</p> <p>5.9 The applicant would also need to take responsibility for amending the statutory list following works to the scheduled monument and this would also need to be noted as a provision within the DCO and with an appropriately worded section in the ES. Again, we recommend the ExA seek further information from the applicant over this matter</p>	<p>The Applicant will make a post-construction application to Historic England to amend the statutory listing to take account of the minor works in the area of the Scheduled Monument. This will be undertaken after the archaeological mitigation has been progressed to an appropriate stage (in consultation with Historic England per the agreed heritage mitigation strategy). This measure will be added to the REAC of the EMP (<b>REP2-027</b>) as a commitment at a subsequent deadline.</p> <p>Where a commitment is secured by way of a DCO requirement and captured within the REAC of the EMP (<b>REP2-027</b>), the Applicant does not consider it is necessary to amend the underlying ES.</p>
	<p><b>6.0 Conclusion</b></p> <p>6.1 Historic England are broadly content with the proposed layout and design. We have provided further information with</p>	<p>This is noted and the Applicant will engage with Historic England on these matters as part of pursuing the Statement of Common Ground.</p>

Reference	Written Representation	Applicant's Response
	<p>regards to the scheduled monument and the non- designated heritage assets.</p> <p>6.2 In relation to the barrow group scheduled monument we concluded that the development would result in a small direct and residual impact. This would be a significant effect and in policy terms would result in harm to a designated heritage asset. We have however concluded this would be less than substantial in nature.</p> <p>6.3 With regards Sacrewell Mill, we concluded there would also be a modest residual impact and a small loss of its setting. This is through changes to the road network to the south of the buildings. This would result in some harm to its significance but at the lower end of less than substantial.</p> <p>6.4 We have also identified the demolition of Wansford Road Station would result in substantial harm to a non-designated heritage asset, and there would be additional harm to the setting of a retained non-designated assets from the loss of the station and other features associated with the station. Due to the design and layout of the road this is regrettable but unavoidable, however further assurances should be sought in relation to the proposal to carefully demolish and rebuild the building at another location.</p> <p>6.5 In relation to the Historic Environment matters and in coming to a decision the ExA would therefore need to weigh the harm against the benefits, as set out policy.</p> <p>6.6 We do have some concerns with regards to the DCO wording and the role of Historic England. We consider these are matters that would need to be addressed prior to the consent being granted.</p>	

## 6 WOODLAND TRUST (REP2-076)

Reference	Written Representation	Applicant's Response
1.0	<p>As the UK's leading woodland conservation charity, the Woodland Trust aims to protect native woods, trees and their wildlife for the future. We own over 1,000 sites across the UK, covering over 30,000 hectares and we have over 500,000 members and supporters. We are an evidence-led organisation, using existing policy and conservation and planning expertise to assess the impacts of development on ancient woodland and ancient and veteran trees. Planning responses submitted by the Trust are based on a review of the information provided as part of the application to the Planning Inspectorate.</p>	<p>These comments are noted.</p>
	<p>The proposed scheme will result in the loss of a veteran oak tree recorded as T20 within the Arboricultural Impact Assessment report [APP-096]. Therefore, the Trust would like to lodge an objection to this development.</p> <p><b>Veteran trees</b> Natural England's standing advice on veteran trees states that they "<i>can be individual trees or groups of trees within wood pastures, historic parkland, hedgerows, orchards, parks or other areas. They are often found outside ancient woodlands. They are also irreplaceable habitats.</i></p> <p><i>A veteran tree may not be very old, but it has significant decay features, such as branch death and hollowing. These features contribute to its exceptional biodiversity, cultural and heritage value.</i>"</p> <p>National planning policy Paragraph 5.32 of the National Policy Statement for National</p>	<p>See Applicant's response to <b>(RR-045-1)</b> in the Applicant's Response to Relevant Representations <b>(REP1-010)</b>.</p> <p>Natural England (NE) and the Forestry Commission guidance (<a href="https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions#:~:text=For%20ancient%20or%20veteran%20trees,15%20times%20the%20tree's%20diameter">https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions#:~:text=For%20ancient%20or%20veteran%20trees,15%20times%20the%20tree's%20diameter</a>) (January 2022) also states that any decision made in regard to a veteran tree should be made in line with paragraph 180 of the NPPF, which is detailed in the <b>(RR-045-1)</b>.</p> <p>To accord with the NPSNN Paragraph 5.32, the reason for removal has been set out. The removal of T20 is unavoidable and necessary due to it being located within the footprint of the Scheme as shown in ES Appendix 7.6 Arboricultural Impact Assessment <b>(REP2-022)</b> Plan 5/9.</p> <p>The planting proposals, as shown in the Environmental</p>

Reference	Written Representation	Applicant's Response
	<p>Networks states: <i>"The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of irreplaceable habitats including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the national need for and benefits of the development, in that location, clearly outweigh the loss. Aged or veteran trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals, the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons for this."</i></p> <p>The National Planning Policy Framework, paragraph 180 states: <i>"When determining planning applications, local planning authorities should apply the following principles: c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons<sup>63</sup> and a suitable compensation strategy exists;"</i></p> <p>Impact of proposals The following scheme will result in the direct loss of a veteran oak tree (T20) to facilitate the new carriageway. Natural England's standing advice for ancient woodland and veteran trees states: "Direct effects of development can cause the loss or deterioration of ancient woodland or ancient and veteran trees by:</p> <ul style="list-style-type: none"> <li>• damaging or destroying all or part of them (including their soils, ground flora or fungi)</li> <li>• damaging roots and understorey (all the vegetation under the taller trees)</li> <li>• damaging or compacting soil</li> </ul>	<p>Masterplan (<b>REP2-024</b>) aim to compensate the loss trees as far as is practicable. In the Arboricultural Impact Assessment (<b>REP2-022</b>) ADAS conclude that "the proposed post-construction landscaping scheme will provide compensation, in the long term, for any necessary tree removals". The compensation to be provided is in accordance with the advice on compensation for the loss of ancient woodland, veteran and ancient trees that is given in Planning Practice Guidance on the natural environment at paragraph 034 (as referenced in the NE and Forestry Commission advice) [and with the advice on compensation for the loss of veteran trees given by Natural England and the Forestry Commission in their advice of January 2022]. The advice is:</p> <p><i>"Proposals can partially compensate for the loss or deterioration of ancient and veteran trees by planting:</i></p> <ul style="list-style-type: none"> <li>• <i>young trees of the same species with space around each one to develop an open crown</i></li> <li>• <i>new trees near to the trees they're replacing</i></li> </ul> <p><i>Proposals should include compensation measures to manage nearby ancient and veteran trees (including dead and dying trees) to help prolong their life."</i></p>

Reference	Written Representation	Applicant's Response
	<ul style="list-style-type: none"> <li>• damaging functional habitat connections, such as open habitats between the trees in wood pasture and parkland</li> <li>• increasing levels of air and light pollution, noise and vibration</li> <li>• changing the water table or drainage</li> <li>• damaging archaeological features or heritage assets”</li> </ul> <p>It is essential that no trees displaying ancient/veteran characteristics are lost as part of the development. Any loss of veteran trees would be highly deleterious to the wider environment of veteran trees within close proximity, which may harbour rare and important species.</p> <p>Natural England's standing advice for protecting veteran trees is as follows: “For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area. Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone.” The Trust requests that the applicants retain T20 and provide a suitable buffer zone as befitting a veteran specimen.</p> <p>Conclusion        In summary, the Woodland Trust requests that veteran tree T20 is retained and afforded a Root Protection Area (RPA) in line with Natural England's standing advice.</p> <p>The Trust will remain opposed to the proposed project unless the scheme is revised to address our concerns. We consider the scheme is currently in direct contravention of national planning policy due to the loss and damage to irreplaceable habitats.</p>	

Reference	Written Representation	Applicant's Response
	<p>We hope our comments are of use to you, if you would like to get in touch with the Trust further to discuss any of the points raised, please do not hesitate to do so.</p>	

## 7 ENVIRONMENT AGENCY (REP2-079)

Reference	Written Representation	Applicant's Response
1.0 1.1	<p><b>1.0 Introduction</b></p> <p>1.1 On 11 January 2022 the Environment Agency ('the Agency') made Relevant Representations (these have been accepted into the Examination as an 'Additional Submission' – document reference AS-043) to the proposal by National Highways ('the Applicant') for the dualling of the A47 between the A1 and the dual carriageway section west of Peterborough. The purpose of these Written Representations is to provide an update on the summaries contained in our Relevant Representation.</p>	These comments are noted.
2.0 2.1	<p><b>2.0 Scope of these representations</b></p> <p>2.1 These Written Representations contain an overview of the project issues, which fall within our remit. They are given without prejudice to any future detailed representations that we may make throughout the examination process. We may also have further representations to make if supplementary information becomes available in relation to the project.</p>	
2.2	<p>2.2 Unless otherwise stated, the comments and requests made in our Relevant Representation remain in place.</p>	
3.0 3.2 3.3	<p><b>3.0 Environment Agency position</b></p> <p>3.1 The Agency can confirm that it has no objection in principle to the proposed development, as submitted.</p> <p>3.2 Our comments and requests made in our Relevant Representation remain in place.</p> <p>3.3 Our request (para 5.2 of our Relevant Representation) for an additional Requirement for flood mitigation implementation, to be included on the Development Consent Order (DCO), has still to</p>	The Applicant is currently considering the proposed requirement and will respond at Deadline 4.

Reference	Written Representation	Applicant's Response
	be agreed with the Applicant and included in an amended DCO.	
3.4	3.4 We have no further comments to make at this stage.	These comments are noted.
3.5	3.5 We reserve the right to add or amend these representations, including requests for DCO Requirements and protective provisions should further information be forthcoming during the course of the examination on issues within our remit.	



## 8 NATURAL ENGLAND (REP2-080)

Reference	Written Representation	Applicant's Response
1.0	<p>These Written Representations are submitted in pursuance of rule 10(1) of the Infrastructure Planning (Examination Procedure) Rules 2010 ('ExPR') in relation to an application under the Planning Act 2008 for a Development Consent Order ('DCO') for A47 Wansford to Sutton ('the Project') submitted by National Highways ('the Applicant') to the Secretary of State.</p> <p>1.1.2. Natural England has already provided a summary of its principal concerns in its Relevant Representations, submitted to the Planning Inspectorate on 21 October 2021. This document comprises an updated detailed statement of Natural England's views, as they have developed in view of the common ground discussions that have taken place with the Applicant to date. These are structured as follows:</p> <ul style="list-style-type: none"> <li>a) Section 2 describes the conservation designations, features and interests that may be affected by the Project and need to be considered.</li> <li>b) Section 3 comprises Natural England's submissions in respect of the issues that concern it. This submission cross-refers to, and is supported by, the evidence contained in the Annexes.</li> <li>c) Section 4 provides a summary of Natural England's case.</li> <li>d) The Annexes contain evidence referred to in the main body of these Representations.</li> </ul>	<p>These comments are noted.</p>
1.1	<p><b>INTRODUCTION</b></p> <p>1.1. Purpose and structure of these representations</p> <p>1.1.1. These Written Representations are submitted in pursuance of rule 10(1) of the Infrastructure Planning (Examination Procedure) Rules 2010 ('ExPR') in relation to an application under the Planning Act 2008 for a Development Consent Order ('DCO')</p>	<p>No response required.</p>

Reference	Written Representation	Applicant's Response
	<p>for A47 Wansford to Sutton ('the Project') submitted by National Highways ('the Applicant') to the Secretary of State.</p> <p>1.1.2. Natural England has already provided a summary of its principal concerns in its Relevant Representations, submitted to the Planning Inspectorate on 21 October 2021. This document comprises an updated detailed statement of Natural England's views, as they have developed in view of the common ground discussions that have taken place with the Applicant to date. These are structured as follows:</p> <ul style="list-style-type: none"> <li>a) Section 2 describes the conservation designations, features and interests that may be affected by the Project and need to be considered.</li> <li>b) Section 3 comprises Natural England's submissions in respect of the issues that concern it. This submission cross-refers to, and is supported by, the evidence contained in the Annexes.</li> <li>c) Section 4 provides a summary of Natural England's case.</li> <li>d) The Annexes contain evidence referred to in the main body of these Representations.</li> </ul>	
	<p><b>CONSERVATION DESIGNATIONS, FEATURES AND INTERESTS THAT COULD BE AFFECTED BY THE PROPOSED PROJECT</b></p> <p>The following is a brief summary of the interest features of the relevant designated areas of concern in this matter. Designation citations and maps are included in Annex A.</p>	No response required
2.1	<p>2.1. International conservation designations <u>Nene Washes Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar</u></p> <p>2.1.1. The Annex II feature present, as a qualifying feature, that is a primary reason for site selection of the SAC is populations of <u>spined loach. Moreton's Leam, a large drainage channel running</u></p>	These comments are noted.

Reference	Written Representation	Applicant's Response
	<p>along the southern flank of the washes, contains a high density of spined loach. Full site data and boundary map for the SAC are attached at Annex A.</p> <p>2.1.2. This site qualifies as an SPA under Article 4.1 of the Directive (79/409/EEC) by supporting an internationally important wintering population of Bewick's swan. The site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting, in summer, nationally important breeding populations of the following migratory species: gadwall, garganey, shoveler, black-tailed godwits as well as several other rare birds. The area further qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting nationally important wintering populations of five migratory species: wigeon, teal, gadwall, pintail and shoveler.</p> <p>2.1.4. The Nene Washes is designated under Ramsar criterion 2 and criterion 6. The site is an extensive area of seasonally-flooding washland and supports several nationally scarce plants. The site also supports an important assemblage of nationally rare breeding waterfowl associated with seasonally-flooding wet grassland which includes assemblages of international importance and species/populations occurring at levels of international importance, such as Bewick's swan.</p> <p>2.1.5. The applicant has submitted to Natural England, through our Discretionary Advice Service (DAS), a Report to Inform Habitats Regulations Assessment. After the submission of the updated 'Report to Inform Habitats Regulations Assessment (Highways England, August 2021)', Natural England is satisfied on the basis of the information submitted that, for the purposes of the Habitats Regulations, the project is unlikely to have a significant effect on the Nene Washes SAC, SPA and Ramsar site alone or in combination with any other plan or project. The scheme is approximately 9.8km from the Nene Washes site and</p>	

Reference	Written Representation	Applicant's Response
	<p>Natural England is satisfied that there has been sufficient consideration of the effects of the proposed scheme, including proposed drainage, to conclude that the scheme is not likely to have a significant effect on the qualifying features of the SAC, SPA or Ramsar site.</p>	
2.2	<p>2.2. National conservation designations <u>Nene Washes Site of Special Scientific Interest (SSSI)</u> 2.2.1. The site is one of the country's few remaining areas of extensive washland habitat. It is of particular note for the supporting nationally and internationally significant numbers of wildfowl and waders, as well as containing a large area of unimproved neutral grassland communities and a richness of the aquatic fauna and flora within its network of dykes. Of particular note in the winter are the large number of pintail, wigeon, and Bewick's swan. The SSSI citation and boundary map are attached at Annex A.</p> <p>Natural England is satisfied that there will be no impacts on the notified features of the SSSI during construction and operation. The scheme is approximately 9.8km from the Nene Washes site and there has been sufficient consideration of the proposed drainage to confirm that the proposals are not likely to have a significant effect on the notified features of the site.</p>	These comments are noted.
2.2.3	<p><u>Sutton Heath and Bog SSSI</u> 2.2.3. This area supports grassland communities of two main types, namely calcareous grassland of the Jurassic limestone type and neutral grassland of the base-poor marsh type. The Jurassic limestone grassland communities are characteristically species-rich. They are further characterised by the dominance of such grasses as sheep's fescue (<i>Festuca ovina</i>), tor-grass (<i>Brachypodium pinnatum</i>) and upright brome (<i>Zerna erecta</i>). The base-poor marsh communities occur along spring flushes and</p>	<p>2.2.3 This comment is noted</p> <p>2.2.4 Please refer to the Applicant's response to <b>RR-032-19</b> in the Applicant's Response to Relevant Representations (<b>REP1-010</b>).</p>

Reference	Written Representation	Applicant's Response
	<p>support a rich flora including a number of plants uncommon in the region. The SSSI citation and boundary map are attached at Annex A.</p> <p>2.2.4. This site is approximately 0.04km to the north of the scheme. Natural England does not consider there is sufficient information available to rule out likely significant effect to Sutton Heath and Bog SSSI with regards to air quality. This SSSI is situated within 200m of the proposed scheme, and the change in nitrogen deposition as a result of the project would exceed the 1% critical load threshold for Sutton Heath and Bog SSSI.</p>	
2.2.5	<p><u>Wansford Pasture SSSI</u> 2.2.5. This site supports two main grassland types that are nationally scarce and are particularly uncommon in Cambridgeshire, notably a species-rich flush and Jurassic limestone grassland. The flush holds a wide range of wet-loving plants, with Blunt-flowered rush (<i>Juncus subnodulosus</i>) being a dominant species. The limestone grassland supports typical herbs and grasses, including salad burnet (<i>Sanguisorba minor</i>), cowslip (<i>Primula veris</i>) and crested hairgrass (<i>Koeleria macrantha</i>). The SSSI citation and boundary map are attached at Annex A. 2.2.6. This site is approximately 0.35km to the south-west of the scheme. Natural England is satisfied with the finding in Chapter 8 of the Environmental Statement (ES) that no impacts on the SSSI features are anticipated. Indirect impacts such as oil or chemical spills and air pollution from dust, and silt, which could result in the loss of plants through uptake of contaminants will be mitigated.</p>	These comments are noted.
2.2.7	<p><u>West Abbot's and Lound Woods SSSI</u> 2.2.7. This site holds a range of lowland woodland types, many of which are scarce in Britain. Ash (<i>Fraxinus excelsior</i>) and field maple (<i>Acer campestre</i>) are present in many parts of the wood, with scattered trees of pendunculate oak (<i>Quercus robur</i>) Of</p>	These comments are noted.

Reference	Written Representation	Applicant's Response
	<p>particular note is the occurrence of alder (<i>Alnus glutinosa</i>) on a springline at the base of the limestone plateau, which is a type known from no other ancient woodland in Cambridgeshire. The SSSI citation and boundary map are attached at Annex A.</p> <p>2.2.8. This site is approximately 0.6km to the north-west of the scheme. Natural England is satisfied with the finding in Chapter 8 of the ES that no impacts on the SSSI features are anticipated. Indirect impacts such as oil or chemical spills and air pollution from dust, and silt, which could result in the loss of plants through uptake of contaminants will be mitigated.</p>	
2.2.9	<p><u>Old Sulehay Forest SSSI</u> 2.2.9. One of an important group of ancient woodlands on calcareous strata in the north-eastern part of Rockingham Forest and contains diverse ground flora, which includes a number of species of rare occurrence in Northamptonshire. Field maple (<i>Acer campestre</i>), hazel (<i>Corylus avellana</i>) and Midland hawthorn (<i>Crataegus oxycanthoides</i>) are the main underwood species with standards of oak, ash and occasionally wych elm (<i>Ulmus glabra</i>). The SSSI citation and boundary map are attached at Annex A.</p> <p>2.2.10. This site is approximately 1.1km to the south-west of the scheme. Natural England is satisfied with the finding in Chapter 8 of the ES that no impacts on the SSSI features are anticipated. Indirect impacts such as oil or chemical spills and air pollution from dust, and silt, which could result in the loss of plants through uptake of contaminants will be mitigated.</p>	These comments are noted.
2.2.11	<p><u>Castor Hanglands SSSI and National Nature Reserve (NNR)</u> 2.2.11. Castor Hanglands contains a range of habitat types from ancient broadleaved woodland to unimproved grassland and scrub, with some of these habitats being scarce in Britain. The woodlands of Castor Hanglands are primarily of an ash-maple</p>	These comments are noted.

Reference	Written Representation	Applicant's Response
	<p>type over soils of limestone, clay, cornbrash and sands. The ground flora holds many plants indicative of an ancient woodland, including wood melick (<i>Melica uniflora</i>), yellow archangel (<i>Lamium galeobdolon</i>) and ramsons (<i>Allium ursinum</i>). The whole area is of high value for invertebrates and some nationally uncommon species are present, including the black hairstreak (<i>Strymonia pruni</i>). The SSSI citation, and the SSSI and NNR boundary maps are attached at Annex A.</p> <p>2.2.12. This site is approximately 1.1km to the north-east of the scheme.</p> <p>Natural England is satisfied with the finding in Chapter 8 of the ES that no impacts on the SSSI features are anticipated. Indirect impacts such as oil or chemical spills and air pollution from dust, and silt, which could result in the loss of plants through uptake of contaminants will be mitigated.</p>	
2.2.13	<p><u>Castor Flood Meadows SSSI</u></p> <p>2.2.13. Castor Flood Meadows are a remnant of the once extensive species-rich alluvial grasslands within the flood plain of the River Nene, with the variety of grassland types present largely influenced by the water content of the soil. Areas of wet alluvial grassland are characterised by the presence of marsh foxtail (<i>Alopecurus geniculatus</i>), floating sweet-grass (<i>Glyceria fluitans</i>), common spike-rush (<i>Elocharis palustris</i>) and tubular water-dropwort (<i>Oenanthe fistulosa</i>). On the drier soils, there are areas of calcareous loam pasture. The SSSI citation and boundary map are attached at Annex A.</p> <p>2.2.14. This site is approximately 2.3km to the south-east of the scheme. Natural England is satisfied with the finding in Chapter 8 of the ES that no impacts on the SSSI features are anticipated. Indirect impacts such as oil or chemical spills and air pollution from dust, and silt, which could result in the loss of plants through</p>	These comments are noted.

Reference	Written Representation	Applicant's Response
	uptake of contaminants will be mitigated.	
2.2.15	<p><u>Southorpe Roughs SSSI</u> 2.2.15. This old quarry site supports limestone grassland communities of the type associated with Jurassic limestone. The grassland communities are characterised by the presence of the grasses such as tor-grass (<i>Brachypodium pinnatum</i>) and sheep's fescue (<i>Festuca ovina</i>). Other characteristic herbs include common rockrose (<i>Helianthemum chamaecistus</i>) and dwarf thistle (<i>Cirsium acaule</i>). The SSSI citation and boundary map are attached at Annex A.</p> <p>2.2.16. This site is approximately 2.1km to the north of the scheme. Natural England is satisfied with the finding in Chapter 8 of the ES that no impacts on the SSSI features are anticipated. Indirect impacts such as oil or chemical spills and air pollution from dust, and silt, which could result in the loss of plants through uptake of contaminants will be mitigated.</p>	These comments are noted.
2.2.17	<p><u>Southorpe Paddock SSSI</u> 2.2.17. Southorpe Paddock holds a limestone grassland community of a type which is nationally scarce. The limestone grassland is dominated by the grasses upright brome (<i>Bromus erectus</i>) and false oat-grass (<i>Arrhenatherum elatius</i>). A range of typical limestone plants are present including purple milk-vetch (<i>Astragalus danicus</i>), clustered bellflower (<i>Campanula glomerata</i>), rockrose (<i>Helianthemum nummularium</i>) and dropwort (<i>Filipendula ulmaria</i>). The SSSI citation and boundary map are attached at Annex A.</p> <p>2.2.18. This site is approximately 1.7km to the north of the scheme. Natural England is satisfied with the finding in Chapter 8 of the ES that no impacts on the SSSI features are anticipated. Indirect impacts such as oil or chemical spills and air pollution</p>	These comments are noted.



Reference	Written Representation	Applicant's Response
	<p>from dust, and silt, which could result in the loss of plants through uptake of contaminants will be mitigated.</p>	
2.2.19	<p><u>Bedford Purlieus SSSI and NNR</u> 2.2.19. This ancient woodland supports a variety of woodland community types which are largely restricted nationally in their distribution to lowland England. Oak (<i>Quercus robur</i>) and ash (<i>Fraxinus excelsior</i>) are generally dominant throughout the wood but the coppice types represented include small leaved lime (<i>Tilia cordata</i>), ash, hazel (<i>Corylus avellana</i>), wych elm (<i>Ulmus glabra</i>) and maple (<i>Acer campestre</i>) on the calcareous clays, and birch (<i>Betula</i> sp.) and sessile oak (<i>Quercus petraea</i>) on acidic sands. The ground flora holds a number of species at the limits of their national distribution such as the grass mountain melick (<i>Melica nutans</i>). The SSSI citation, and the SSSI and NNR boundary maps are attached at Annex A.</p> <p>2.2.20. This site is approximately 2.2km to the west of the scheme. Natural England is satisfied with the finding in Chapter 8 of the ES that no impacts on the SSSI features are anticipated. Indirect impacts such as oil or chemical spills and air pollution from dust, and silt, which could result in the loss of plants through uptake of contaminants will be mitigated.</p>	These comments are noted.
2.3	<p><b>2.3 European Protected Species</b> <u>Bats (various species)</u> 2.3.1. Bats are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and listed under Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended).</p> <p>2.3.2. Natural England is currently assessing a draft licence application for bats.</p>	These comments are noted.

Reference	Written Representation	Applicant's Response
	<p><u>Great Crested Newts (GCN)</u> 2.3.3. Great crested newts are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and listed under Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended).</p> <p>2.3.4. As further surveys are still to be completed, potential adverse impacts cannot be ruled out at this stage.</p>	This comment is noted.
2.3.5	<p><u>Otter</u> 2.3.5. Otters are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and listed under Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended).</p> <p>2.3.6. Mitigation proposals state that preconstruction surveys will be carried out in order to inform any required licences from Natural England. On this basis, Natural England has no objections to the scheme in relation to impacts on otters.</p>	This comment is noted.
2.4	<p><b>2.4 Nationally Protected Species</b> <u>Badger</u> 2.4.1. Badgers are protected under the Protection of Badgers Act 1992 (as amended).</p> <p>2.4.2. Natural England is currently assessing a draft licence application for badgers.</p>	This comment is noted.
2.4.3	<p><u>Water vole</u> 2.4.3. Water voles are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended).</p> <p>2.4.4. Natural England is currently assessing a draft licence application for water voles.</p>	This comment is noted.

Reference	Written Representation	Applicant's Response
2.4.5	<p><u>Wintering birds and breeding birds, including barn owl</u> 2.4.5. All wild bird species, their eggs and nests are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended).</p> <p>2.4.6. The ES has identified major adverse impact to wintering and breeding birds, including barn owl, through temporary loss of habitat / nesting habitat, and disturbance, obstruction and direct loss of habitat. Natural England is satisfied in principle with the mitigation measures set out, including implementation of best practice working methods and habitat creation and enhancement.</p>	This comment is noted.
2.4.7	<p><u>Reptiles: common lizard</u> 2.4.7. Common lizard is protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and listed as priority species within the UK Post-2010 Biodiversity Framework.</p> <p>2.4.8. The ES has identified minor adverse impact to reptiles. Natural England is satisfied in principle with the mitigation measures set out, including implementation of best practice working methods and habitat creation and enhancement.</p>	This comment is noted.
2.5	<p><b>2.5. Landscape designations</b> 2.5.1. There are no statutorily designated landscapes relevant to the Scheme hence Natural England offers no further comment.</p>	This comment is noted.
2.6	<p><b>2.6. Non-designated interests and features of concern</b> 2.6.1. There are areas of non-designated but valuable and sensitive habitat which could be affected, including Sutton Meadows North County Wildlife Site (CWS), Sutton Dismantled Railway CWS and River Nene CWS.</p>	This comment is noted.

Reference	Written Representation	Applicant's Response
	<p>2.6.2. UK Priority Habitats that will be affected by the proposal include broadleaved woodland, calcareous grassland, and hedgerows. Other habitats affected include arable land, neutral grassland, ponds and rivers.</p> <p>2.6.3. Non-designated interests and features are beyond the scope of Natural England's remit hence we offer no further comment.</p>	
2.7	<p><b>2.7. Soils</b></p> <p>2.7.1. The project will result in physical damage, and or permanent loss of approximately 45ha of agricultural land, including 33.8ha classified as Best and Most Versatile (BMV) land (Agricultural Land Classification (ALC) grades 1 – 3a) through temporary and permanent landtake. Physical damage to soil will occur through excavation and temporary storage, soil compaction and the exacerbation of soil erosion through handling and storage of soils. Embedded and essential mitigation measures and monitoring have been incorporated into the scheme to minimise impacts on soils and BMV land as far as possible.</p> <p>2.7.2. There appears to have been good consideration of soil and ALC matters in the submitted documents using key reference and guidance documents. As advised in our Relevant Representation, it is important that soil is able to retain as many of its many important functions and services (ecosystem services) as possible through careful soil management in order to safeguard soil resources of the temporary land-take as part of the overall sustainability of the development. As a result, we also advised that if the development proceeds, the developer uses an appropriately experienced soil specialist to advise on and supervise soil handling, including identifying when soils are dry</p>	See the Applicant's response to <b>RR-032-22</b> in the Applicant's Response to Relevant Representations ( <b>REP1-010</b> ).

Reference	Written Representation	Applicant's Response
	<p>enough to be handled and how to make best use of the different soils on site.</p>	
2.8	<p><b>2.8 Biodiversity Net Gain</b> 2.8.1. As indicated in our Relevant Representation, Natural England advises that consideration should be given to incorporating biodiversity and green infrastructure enhancements into the scheme to deliver benefits for people and wildlife. The land around Sutton Heath and Bog SSSI could be enhanced and used to create species-rich grassland, which would act as a buffer between the road and the SSSI. There is also potential for beneficial wetland habitat to be created and improved between the road and the River Nene.</p> <p>2.8.2. We note the use of Defra metric 2.0 for Biodiversity Net Gain, but we advise that further information is provided on the methods used to assess net gain, as well as the project's overall target for net gain. As a public body with statutory duties to have regard to biodiversity under the NERC Act, we expect National Highways to have clear and measurable ambitions for the project to leave a positive legacy for nature proportionate to the scale and location of the scheme. We also recommend the use of the Defra 3 metric to ensure accuracy of net gain calculations for this scheme.</p>	<p>Please refer to the Applicant's response to <b>RR-0320-15</b> of the Applicant's Response to the Relevant Representations (<b>REP1-010</b>) part 7.</p> <p>In response to improving habitats around Sutton Heath and Bog SSSI please refer to the Applicant's response to <b>RR-032-15</b> in the Applicant's Response to Relevant Representations (<b>REP1-010</b>) part 8.</p> <p>The Biodiversity Metric was also provided at Deadline 2 as per ExA Q1.2.14 (<b>REP2-037</b>).</p>
3	<p><b>3. NATURAL ENGLAND'S CONCERNS AND ADVICE</b> <b>3.1. The principal issues</b></p> <p>3.1.1. Natural England identified the following main issues in its Relevant Representations:</p> <ul style="list-style-type: none"> <li>• Further information requested to rule out significant impacts on Sutton Heath and Bog SSSI with regard to air quality.</li> <li>• Further information requested on the methods used to</li> </ul>	<p>These comments are noted, and a response is provided to each in issue in turn.</p>

Reference	Written Representation	Applicant's Response
	<p>assess net gain, as well as the project's overall target for net gain.</p> <ul style="list-style-type: none"> <li>The ES and other relevant documents will need updating pending the outcome of ongoing habitat and species survey updates.</li> </ul> <p>These issues will be discussed in corresponding sections below along with any updates on the progress or resolution of issues.</p>	
3.2	<p><b>3.2. Further information requested should be provided to rule out likely significant effect on Sutton Heath and Bog SSSI with regard to air quality.</b></p> <p>3.2.1. As detailed above, Natural England does not consider there is sufficient information available to rule out likely significant effect to Sutton Heath and Bog SSSI with regards to air quality. The main reason for this is that the site is approximately 40m to the north of the scheme, and the change in nitrogen deposition as a result of the project would exceed the 1% critical load threshold for Sutton Heath and Bog SSSI.</p> <p>3.2.2. Air quality modelling has been conducted and has indicated an impact of nitrogen deposition 40m north of the proposed scheme. The habitat within the 40m area according to section 5.8.22. of the ES is deciduous woodland comprising of pedunculate oak (<i>Quercus robur</i>), sycamore (<i>Acer pseudoplatanus</i>), hawthorn (<i>Crataegus</i> spp.) and elder (<i>Sambucus nigra</i>). The report states that 'with the help of a competent expert, no significant effects on the sensitive qualifying features of the SSSI have been identified'.</p> <p>3.2.3. To rule out significant impacts to Sutton Heath and Bog SSSI with regards to air quality, we require further information on the work that was undertaken to determine the location and distribution of qualifying features that are sensitive to nitrogen</p>	<p>Please refer to the Applicant's response to <b>RR-032-19</b> in the Applicant's Response to Relevant Representations (<b>REP1-010</b>).</p>

Reference	Written Representation	Applicant's Response
	deposition. Measures for mitigation and monitoring of air quality impacts for Sutton Heath and Bog SSSI should also be outlined.	
3.3	<p><b>3.3. Further information requested on the methods used to assess net gain, as well as the project's overall target for net gain.</b></p> <p>3.3.1. We welcome the commitment to identify enhancement opportunities that would support net gain, however Natural England advises that further information is provided on the methods used to assess net gain, as well as the project's overall target for net gain. We also recommend the use of the Defra 3 metric to ensure accuracy of net gain calculations for this scheme.</p>	<p>Please refer to the Applicant's response to <b>RR-032-15</b> within the Applicant's Response to Relevant Representations (<b>REP1-010</b>) part 7.</p> <p>The Biodiversity Metric was also provided at Deadline 2 as per ExA Q 1.2.14 (<b>REP2-037</b>).</p>
3.4	<p><b>3.4 The ES and other relevant documents will need updating pending the outcome of ongoing habitat and species survey updates.</b></p> <p>3.4.1. We note that further habitat and species survey work is still to be undertaken, including survey work for GCN. Natural England advises that the ES and other relevant documents will need updating pending the outcome of this ongoing work.</p>	<p>Please refer to Applicant's response to <b>RR-032-30</b> within the Applicant's Response to Relevant Representations (<b>REP1-010</b>).</p>

Reference	Written Representation	Applicant's Response
<p>4 4.1.1</p>	<p><b>4. CONCLUSIONS</b>            4.1.1. Natural England has reviewed the Environmental Statement (ES), Habitats Regulations Assessment (HRA) and accompanying documents and is broadly satisfied that impacts to statutorily designated sites can be ruled out or proposed mitigation is sufficient to demonstrate no adverse effect. The exception to this is in relation to Sutton Heath and Bog SSSI and Natural England have advised that further evidence is required, to support the no likely significant effect conclusion. As detailed above, we require further information on the work undertaken to determine the location and distribution of qualifying features that are sensitive to nitrogen deposition and measures for mitigation and monitoring of air quality impacts for the SSSI should be outlined. Further information will need to be provided on the methods used to assess net gain, as well as the project's overall target for net gain and we recommend the use of the Defra 3 metric. The ES and other relevant documents will also need updating pending the outcome of ongoing survey work.</p>	<p>Please refer to Applicant's response to <b>RR-032-19</b> within the Applicant's Response to Relevant Representations (<b>REP1-010</b>).</p> <p>With regards to the Biodiversity Net Gain question, please refer to Applicant's response <b>RR-0320-15</b> part 7 in the Applicant's Response to the Relevant Representations (<b>REP1-010</b>).</p>



## 9 FIGHT4UPTON (REP2-083)

Reference	Written Representation	Applicant's Response
1.0	Wansford Alternative Visions Document - Wansford Parish Council July 2018 submitted	No response required.

## 10 MILTON (PETERBOROUGH) ESTATES COMPANY (REP2-084)

Reference	Written Representation	Applicant's Response
1	<p>These representations are made without prejudice to making further representations for different reasons, or in order to amplify these representations.</p> <p>On behalf of Milton (Peterborough) Estates Company and Sir Philip Naylor Leyland BT.</p>	<p>This is noted.</p>
2	<p>Common Response E Consultation with Upton – The 2018 Statutory Consultation following the presentation of the Preferred Route Announcement (PRA) EXCLUDED consultation with Upton Village. It has come to light that Wansford and Sutton Parish Council produced a joint proposal 4 July 2018 Annex A moving the roundabout and closing the Upton Road. Can it be made clear that the residents of Upton were unaware of this proposal. As stated, Upton does not have a demographically elected body (this should be Sutton PC) They were only made aware of the revisions in July 2020. It also states that there were no significant objections to the proposal at this meeting again this is untrue, as it was the foundation for the Fight for Upton campaign.</p> <p>We believe the process is flawed and that the persons mostly effected were not consulted adequately. We have commented in detail on this on our submission of the 21.10.2021.</p> <p>The 2020 proposal has removed Upton's access, and safe, suitable appropriate connection to A47.</p> <p>We strongly request you reconsider the loss of an access to the village of Upton as Highways England have not consulted appropriately on this new outline scheme design. From 12th</p>	<p>When the Project Update Brochure was issued, key keyholders and local residents were given the opportunity to respond and share their views. The Applicant invited feedback through the following channels:</p> <ul style="list-style-type: none"> <li>• By post to A47 WANSFORD TO SUTTON, Highways England, Woodlands, Manton Lane, Bedford MK41 7LW</li> <li>• By email to <a href="mailto:A47WansfordtoSuttonRIS@highwaysengland.co.uk">A47WansfordtoSuttonRIS@highwaysengland.co.uk</a></li> </ul> <p>In response to the targeted statutory consultation October 2020, a number of residents in Upton also collectively submitted feedback to the Applicant about alternative route options for the Scheme. This feedback was submitted during the consultation period, and the residents also followed-up in December 2020 with further correspondence on the proposed route options.</p> <p>The Applicant considered this feedback and continued engagement with the residents. Annex O of the Consultation Report (<b>APP-038</b>) provides a response to the alternative route options suggested.</p>

Reference	Written Representation	Applicant's Response
	<p>November 2018 when the extended consultation period ended to the 19th October 2020 when the Project update was issued with a new route no attempt was made to consult key stakeholders or local residents.</p>	
3	<p>Common Response F – Upton Drift/Langley Bush Road Safety</p> <p>1 Upton Drift – we would like to point out that not only does Upton Drift cater for agricultural vehicles from Model Farm but also for Manor Farm, Upton which has one of the largest grain stores in the area and for our tenants at Scotsman's Lodge Farm Helpston who farm land down Upton Road, who would also use this access. That is a significant amount of large agricultural vehicles. Passing places are inadequate for multiple large agricultural vehicles and HGVs especially during the harvest months.</p>	<p>The new passing places proposed on the Upton Drift have been designed to accommodate large agricultural vehicles as shown in <b>Annex P</b> of the Applicant's Response to the Examining Authority's First Written Questions (ExQ1) – Annexes (<b>REP2-036</b>).</p> <p>These passing places are wider, longer, and more frequent than the existing passing places on Upton Road.</p>
4	<p>As the current scheme stands, we believe the access road known as the Drift and the junctions onto Langley Bush Road and Sutton Heath Road are un safe with the increased usage following the closure of Upton Road and again do they comply with the DMRB.</p>	<p>Please refer to <b>Common Response F</b> of the Applicant's Response to Relevant Representations (<b>REP1-010</b>).</p> <p>The DMRB provides requirements for motorways and all-purpose trunk roads. Much of the existing local road network does not comply with the DMRB.</p>
5	<p>Consideration would be given to the Drift Road being made into a dual road as Milton own the land on either side. Highways England have offered increased passing places and some straightening but these attract unwanted fly tipping and leisure parking/activities.</p> <p>On behalf of the Milton (Peterborough) Estates Company &amp; Sir Philip Naylor Leyland, we are in support of the Dualling of the A47 but will be minded to appeal against this application as it stands.</p>	<p>The proposed improvements are appropriate for the level of traffic that will use the access. They are also in keeping with other local access roads in the area.</p> <p>The Applicant is considering the concerns mentioned and discussing the issues with PCC. A meeting was held with the Applicant and PCC on 23 February 2021 to discuss the Scheme proposals and alleged antisocial behaviours in the vicinity of the Scheme (the Applicant developing a Statement of Common Ground with PCC, where it is hoped that details of these</p>

Reference	Written Representation	Applicant's Response
		discussions will be included).

## 11 BLETSOES ON BEHALF OF DAVID LONGFOOT (REP2-085)

Reference	Written Representation	Applicant's Response
1.0	These representations are made without prejudice to making further representations for different reasons, or in order to amplify these representations, and in response to the applicants responses to previously submitted Relevant Representations.	This comment is noted.
2	We understand that National Highways intend to acquire approx. 12 acres of land that is occupied by Mr Longfoot. The loss of this land will impact negatively on Mr Longfoot's farm business as he will be losing a secure lifetime tenancy over a productive area of arable land. We note National Highway's comments that Mr Longfoot will receive fair and reasonable compensation for his losses, and this will be agreed with the District Valuer.	<p>The Applicant has ensured that the amount of land required is the minimum to deliver the Scheme.</p> <p>The land that Mr Longfoot tenants is critical to the delivery of the Scheme and as such the Applicant needs to acquire it. As a tenant of the land, Mr Longfoot will receive fair and reasonable compensation for his losses and this figure will be agreed through the District Valuer who is impartial.</p>
3	National Highway's proposals seek to stop up Upton Road, which is the principal access for Mr Longfoot to reach the A47. Mr Longfoot uses Upton Road to travel from his main holding to land at Castor, which is where the majority of his farming business is based. The alternative route along 'Upton Drift' is extremely narrow and has a ditch on one side of the highway and a banked hedge on the other, making it difficult to get out of the road with any urgency. The poor visibility also makes this section dangerous. We understand that National Highways have undertaken further design work and have included, new passing places, widening of the existing junction of Langley Bush Road and the junction adjacent to Model Farm, and straightening and widening parts of 'Upton Drift'. The design of the passing places along 'Upton Drift' have been amended to provide sufficient space to accommodate agricultural vehicles, and National Highways have commented that the closure of 'Upton Road' will create a relatively small increase in traffic	<p>Please refer to <b>Common Response F</b> of the Applicant's Response to Relevant Representations (<b>REP1-010</b>).</p> <p>With the Scheme, the traffic accessing Upton via Upton Road will access Upton via the Upton Drift.</p> <p>Based on 2015 modelled 2-way Annual Average Daily Traffic Flows (AADT), rounded to the nearest one hundred, Upton Road experiences 400 vehicle movements.</p> <p>Based on these traffic numbers above, the Applicant considers this to be a relatively small increase in traffic along Upton Drift.</p>

Reference	Written Representation	Applicant's Response
	<p>along 'Upton Drift' with traffic only being associated with Model Farm and up to 30 properties, with no through traffic. Mr Longfoot strongly disagrees with this as in his opinion there will be a lot more traffic along 'Upton Drift' due to heavy lorries continuously visiting Manor Farm on the east side of Upton.</p>	
4	<p>The section of Langley Bush Road which road users would be required to follow once turning out of the 'Upton Drift' is both winding and narrow, with poor visibility. Much of the metalled road is bordered tightly by vegetation. There would be very little room for agricultural machinery to manoeuvre along this road. This stretch of road is also considered 'fast' and in icy conditions it is dangerous. Vegetation clearance will be required as well as the inclusion of a sufficient number of passing bays or widening of the road. The junction which leads on to Sutton Heath Road from Langley Bush Road has poor visibility and is potentially dangerous when agricultural machinery is manoeuvring out of the junction, it is understood that visibility splays at this junction will be improved.</p> <p>Mr Longfoot has arranged for video footage and photographs to be taken whilst he takes agricultural machinery along the 'Upton Drift' and down to the A47 via Langley Bush Road and Sutton Heath Road, which we can forward to you for reference.</p>	<p>Please refer to <b>Common Response F</b> of the Applicant's Response to Relevant Representations (<b>REP1-010</b>).</p>
5	<p>There are concerns surrounding unauthorised access, fly tipping and travellers if the access road to the south of the village were to be stopped up. The provision of new signage would help to mitigate any negative impact.</p>	<p>The Applicant responded to this concern from Bletsoes on behalf of David Longfoot in the Applicant's Response to Relevant Representations, please refer to the Applicant's response to <b>RR-004-04</b>.</p>
6	<p>Mr Longfoot wishes to request that National Highways consider the option to leave the existing roundabout in situ to then construct additional lanes on the existing A47, opposed to constructing the new road and roundabout as proposed. This</p>	<p>Please refer to the Applicant's response to <b>RR-030-03</b> in the Applicant's Response to Relevant Representations (<b>REP1-010</b>).</p>

Reference	Written Representation	Applicant's Response
	would prevent the need to stop up Upton Road access.	
7	Mr Longfoot wishes to seek reassurance and confirmation that there will be unimpeded access at all times throughout the construction period for him to travel to and from Upton village where his main farmstead is based. He will need to be informed of any restricted road use or closures in advance and kept fully informed during the construction phase.	Access to Upton Village will be provided at all times throughout the construction period. Please refer to the Outline Traffic Management Plan ( <b>REP2-029</b> ) – section 3.13 outlines the communication plan during construction.

## Annex A – Transport Assessment Tables

**Table 4-1: Old North Road Traffic Count Data**

Location	Dir	Observed Flow 2014 (veh)			Observed Flow 2016 (veh)			Observed Flow 2019 (veh)			Observed Flow 2021 (veh)		
		AM	IP	PM	AM	IP	PM	AM	IP	PM	AM	IP	PM
Old North Road	SB	105	107	229	100	119	218	119	119	195	161	122	145
Old North Road	NB	513	131	201	453	132	202	417	135	196	136	126	130

**Table 4-2: AADT results superseded assessment**

Location	2 Way AADT BASE	2 Way AADT 2022 DM	2022 DM - Base	Difference	2 Way AADT 2022 DS	2 Way AADT 2022 Diff	2 Way AADT 2037 DM	2 Way AADT 2037 DS	2 Way AADT 2037 Diff	2037 DS - Base	Difference as %
Old North Road	4,400	2,400	-2,000	-45%	1,900	-500	3,100	2,700	-400	-1,700	-39%
A1 NB off Slip	2,400	3,900	1,500	63%	4,700	800	4,900	5,800	900	3,400	142%

**Table 4-3: AADT results from the Transport Assessment**

Location	2 Way AADT BASE	2 Way AADT 2025 DM	2025 DM - Base	Difference	2 Way AADT 2025 DS	2 Way AADT 2025 Diff	2 Way AADT 2040 DM	2 Way AADT 2040 DS	2 Way AADT 2040 Diff	2040 DS - Base	Difference as %
Old North Road	4,400	2,600	-1,800	-41%	2,800	200	3,100	3,300	200	-1,100	-25%
A1 NB off Slip	2,400	4,000	1,600	67%	4,600	600	4,700	5,600	900	3,200	133%