

# A47 Wansford to Sutton Dualling

**Scheme Number: TR010039**

**Volume 9**

## **9.21 Applicant's Comments on Deadline 4 Submissions**

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

Planning Act 2008

April 2022

Deadline 5

Infrastructure Planning

Planning Act 2008

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

A47 Wansford to Sutton  
Development Consent Order 202[x]

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**9.21 APPLICANT'S COMMENTS ON DEADLINE 4  
SUBMISSIONS**

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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/9.21
<b>BIM Document Reference</b>	PCF STAGE 4
<b>Author</b>	A47 Wansford to Sutton Project Team, National Highways

<b>Version</b>	<b>Date</b>	<b>Status of Version</b>
Rev 0	April 2022	Deadline 5

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## **1 INTRODUCTION**

- 1.1.1 The Development Consent Order (DCO) application for the A47 Wansford to Sutton Scheme was submitted on 05 July 2021 and accepted for examination on 02 August 2021.
- 1.1.2 The purpose of this document is to set out National Highways' (the Applicant) Comments on Deadline 4 submissions.

## 2 DAVID LONGFOOT (REP4-022) – POST HEARING SUBMISSION – FARMERS WEEKLY ARTICLE

	Response	Applicant's Response
1	<p>Mr Longfoot Submitted the Farmers Weekly Article – Farmers blast ‘totally unsafe’ Highways England road plans 25 May 2021.</p> <p>The article states:</p> <p>Farmers have blasted new road plans that will force them on a longer and “highly dangerous” journey to join the A47 from Upton Village, near Peterborough.</p> <p>Tractors and trailers carting crops and arctic lorries loaded with farm supplies will have to use the narrow country lanes, Upton Drift and Langley Bush Road to join the A47 from Upton, instead of the wider main road they currently use.</p> <p>The proposals, which will be submitted for planning review this summer, are part of Highways England’s plans to upgrade the A47 between Wansford and Sutton to a dual carriageway, to improve safety and ease congestion.</p> <p>Four farms and a farm contractor in the immediate area use the roads everyday.</p> <p>Mixed farmer David Longfoot said the rural community was being “steamrolled” by Highways England.</p> <p>“Why are they not accepting that we cannot run agricultural vehicles and cars safely past one another on Langley Bush Road. Why are they closing our perfectly good road that is wider and a mile-and-a-half shorter [to access the A47]?” asked Mr Longfoot.</p> <p>“We are going to be left with something that is highly dangerous and totally unsafe.”</p>	<p>It is unclear what the evidential benefit of this article is to the Examination.</p> <p>In any event, the Applicant has addressed the issues raised in the article in <b>Common Response F</b> in the Applicant’s Response to Relevant Representations (<b>REP1-010</b>).</p>

	Response	Applicant's Response
	<p>Currently, the farmers use the wider Upton Road to access the A47 at Nene Way roundabout.</p> <p>But the plans would see the road closed and the roundabout moved closer to Wansford, which would force the farmers to use the narrow lanes to access Sutton Heath Road where they can join the A47 at the new roundabout.</p> <p>Mr Longfoot added: "We have been waiting nine months for a safety audit of the lanes. Langley Bush Road is less than 7m wide hedgerow to hedgerow.</p> <p>Highways England has proposed passing places on Upton Drift. But will these be big enough for tractors and trailers. And we are even more worried about fly tipping now."</p> <p><b>Highways England response</b></p> <p>Highways England said the main road connection to Upton is being closed because of the design changes made after feedback at the public consultation in 2018.</p> <p>A spokesperson said: "During the consultation, we received significant feedback regarding the scheme's proposed southern route [south of the existing A47 road], its environment impacts and rat-running through local villages.</p> <p>"To resolve these problems, the scheme route moved to the north of the existing A47, with the existing Nene Way roundabout to be relocated to a safer position.</p> <p>"These changes also resulted in the removal of one of the access routes into the village of Upton and, to address this, the remaining route will be upgraded to allow for easy passing points for HGVs and agricultural vehicles. Upton has also suffered from rat-running, which will be resolved with these changes."</p>	

	Response	Applicant's Response
	Highways England has said residents would have another opportunity to provide feedback once the planning application has been submitted, and it would continue to engage with them through the design and construction phases of the project.	

### 3 DAVID LONGFOOT (REP4-023)- POST HEARING SUBMISSION – FARMERS 4 UPTON LETTER

	Response	Applicant's Response
1	As Farmers we realise we are not always that popular to Upton residents. Leaving mud on the roads and waking people up early in the morning. Has been some of the common complaints. That's why we are extremely concerned about Highways England (H. E.) plan to close Upton Main Street leaving Upton residents with only one exit out of Upton to join the A47.	The Applicant has addressed these concerns in <b>Common Response F</b> in the Applicant's Response to Relevant Representations ( <b>REP1-010</b> ).
2	The problem is ... it is the worst of the two routes being narrow with sharp bends, poor visibility and poor drainage with water that freezes over in winter particularly on the Langley Bush Road with Southorpe road. This will leave you with an extra 1 1/2 miles to travel on a road with no pulling places as H.E. do not intend to do anything to Langley Bush road. This will leave you stuck behind a wide slow agricultural vehicles making us more unpopular than ever. That's why it is important to attend the meeting on at September 9th to ask H.E. a few questions.	
	1) Why can't the existing Main Street road be connected to the new roundabout 1/2 mile further west? (See enclose quote from Mick George.) Of less than £300,000 of 1/2 a mile of a nice new road of 4 1/2 M wide. Far superior of Drift and Langley Bush Road specification. P	This concern was addressed in the Applicant's response to Point 3.16 of ISH3 on Page 46 of the Applicant's Written Summary of Oral Submissions at Hearings ( <b>REP4-018</b> ).
	2) Why has there been no risk assessment been completed on the danger of shoe horning all the traffic down one route? ( They have not completed a traffic survey)	As has been set out in the Applicant's response to <b>Action Point 37</b> (Applicant's Further Response to Actions from Hearings ( <b>TR010039/EXAM/9.22</b> )):  <i>"It is assumed that all traffic currently using Upton Road would now use the Upton Drift, Langley Bush Road, and Sutton Heath Road to access the A47.</i>  <i>Traffic counts for Upton Road were undertaken on Tuesday 8<sup>th</sup> October 2019 (07:00-19:00). The vehicle category descriptions are taken from the COBA manual, the extract of which is included in</i>



	Response	Applicant's Response																																																
		<p data-bbox="1137 245 1973 341"><i>Annex F – COBA Manual Vehicle Category Descriptions (TR010039/EXAM/9.23). Total two way traffic from this survey is summarised as follows:</i></p> <p data-bbox="1137 379 1308 411"><b><i>Upton Road</i></b></p> <table border="1" data-bbox="1137 411 1780 707"> <thead> <tr> <th><i>Vehicle Type</i></th><th><i>Daily Total</i></th><th><i>% of total</i></th></tr> </thead> <tbody> <tr> <td><i>Cars</i></td><td><i>258</i></td><td><i>77</i></td></tr> <tr> <td><i>LGV</i></td><td><i>51</i></td><td><i>15</i></td></tr> <tr> <td><i>OGV1</i></td><td><i>12</i></td><td><i>4</i></td></tr> <tr> <td><i>OGV2</i></td><td><i>5</i></td><td><i>1</i></td></tr> <tr> <td><i>PSV</i></td><td><i>2</i></td><td><i>1</i></td></tr> <tr> <td><i>M/B</i></td><td><i>0</i></td><td><i>0</i></td></tr> <tr> <td><i>Cycle</i></td><td><i>8</i></td><td><i>2</i></td></tr> </tbody> </table> <p data-bbox="1137 742 2040 842"><i>Traffic counts for Sutton Heath Road were undertaken on Tuesday 8<sup>th</sup> to Thursday 10<sup>th</sup> October 2019 (24hr). Average Total two way traffic from this survey can be summarised as follows:</i></p> <p data-bbox="1137 879 1391 911"><b><i>Sutton Heath Road</i></b></p> <table border="1" data-bbox="1176 911 1780 1241"> <thead> <tr> <th><i>Vehicle Type</i></th><th><i>Daily Total (Av)</i></th><th><i>% of total</i></th></tr> </thead> <tbody> <tr> <td><i>Cars</i></td><td><i>1577</i></td><td><i>84</i></td></tr> <tr> <td><i>LGV</i></td><td><i>213</i></td><td><i>11</i></td></tr> <tr> <td><i>OGV1</i></td><td><i>33</i></td><td><i>2</i></td></tr> <tr> <td><i>OGV2</i></td><td><i>27</i></td><td><i>1</i></td></tr> <tr> <td><i>PSV</i></td><td><i>5</i></td><td><i>0</i></td></tr> <tr> <td><i>M/B</i></td><td><i>8</i></td><td><i>0</i></td></tr> <tr> <td><i>Cycle</i></td><td><i>7</i></td><td><i>0</i></td></tr> </tbody> </table> <p data-bbox="1137 1276 2047 1442"><i>There is no traffic survey data available for Langley Bush Road between the junction of Sutton Heath Road and the Upton Drift. The traffic model has therefore been interrogated to gain an understanding of the proportion of Sutton Heath Road traffic that uses Langley Bush Road. These results can be found in Annex G - Langley</i></p>	<i>Vehicle Type</i>	<i>Daily Total</i>	<i>% of total</i>	<i>Cars</i>	<i>258</i>	<i>77</i>	<i>LGV</i>	<i>51</i>	<i>15</i>	<i>OGV1</i>	<i>12</i>	<i>4</i>	<i>OGV2</i>	<i>5</i>	<i>1</i>	<i>PSV</i>	<i>2</i>	<i>1</i>	<i>M/B</i>	<i>0</i>	<i>0</i>	<i>Cycle</i>	<i>8</i>	<i>2</i>	<i>Vehicle Type</i>	<i>Daily Total (Av)</i>	<i>% of total</i>	<i>Cars</i>	<i>1577</i>	<i>84</i>	<i>LGV</i>	<i>213</i>	<i>11</i>	<i>OGV1</i>	<i>33</i>	<i>2</i>	<i>OGV2</i>	<i>27</i>	<i>1</i>	<i>PSV</i>	<i>5</i>	<i>0</i>	<i>M/B</i>	<i>8</i>	<i>0</i>	<i>Cycle</i>	<i>7</i>	<i>0</i>
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	<p><i>Bush Road traffic from SATURN model base year (2015). Based on these results, approximately 60% of HGV traffic using Sutton Heath Road uses Langley Bush Road. This equates to the following:</i></p> <p><i>Estimate for Langley Bush Road</i></p> <table><tr><th>Vehicle Type</th><th>Daily Total (Est)</th></tr><tr><td>OGV1</td><td>20</td></tr><tr><td>OGV2</td><td>16</td></tr></table> <p><i>Adding all the surveyed Upton Road traffic to the estimated Langley Bush Road traffic would provide the following HGV numbers. (Whilst the Upton Road survey considered to affect this assessment):</i></p> <p><i>Estimate for Langley Bush Road + Upton road:</i></p> <table><tr><th>Vehicle Type</th><th>Daily Total (Est)</th></tr><tr><td>OGV1</td><td>32</td></tr><tr><td>OGV2</td><td>21</td></tr></table> <p><i>In addition to the assessment above, data from Peterborough city Council (refer to REP4-040)) indicates the following percentages of HGV on local roads in the area as follows:</i></p> <p><i>Langley Bush Road, Helpston: 2.4%</i> <i>Walcot Road East, near Ufford: 1.9%</i> <i>High Filed Road, West of Langley Bush Road: 2.9%</i></p> <p><i>These percentages generally align to the above percentages of HGV traffic expected to use Langley Bush Road between the junction of Sutton Heath Road and the Upton Drift.</i></p> <p><i>Peterborough City Council have confirmed to National Highways that Langley Bush Road is in keeping with all other similar roads in the area, and suitable for the level of HGV traffic anticipated to use it."</i></p>	Vehicle Type	Daily Total (Est)	OGV1	20	OGV2	16	Vehicle Type	Daily Total (Est)	OGV1	32	OGV2	21
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OGV1	20												
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	Response	Applicant's Response
	3) Why has there been no account been taken of the extra fly tipping and Traveller caravans we will get from the severed road?	This issue was addressed in the Applicant's Response to Relevant Representations ( <b>REP1-010</b> ) ( <b>RR-004-04</b> ).
	4) Why has no account been taken of Upton punches above its size in food production? It has five active Farming Businesses and Manor Farm is a major storage area for cereals. Thus, attracting large lorries which will now have to travel an unsuitable road.	The Applicant has addressed these concerns in <b>Common Response F</b> in the Applicant's Response to Relevant Representations ( <b>REP1-010</b> ).
	5) When two 4.2 meter wide agricultural vehicles meet on Langley Bush Road. How are they supposed to pass each other?	
	6) Why do they treat Upton residents as second class citizens? Only informing us of plan to move the roundabout 1/2 a mile west in July 2020 and allowing Sutton Parish Council to speak on our behalf?	The Applicant has addressed this concern in <b>Common Response E</b> in the Applicant's Response to Relevant Representations ( <b>REP1-010</b> ).
	7) Will H.E. accept responsibility for injury or accidents caused by their plans to create an unsuitable road? With present road system never been a serious accident (so far).	The Applicant is not creating an unsuitable road. As has been set out in the Applicant's response to <b>Action Point 37</b> (Applicant's Further Response to Actions from Hearings ( <b>TR010039/EXAM/9.22</b> )) appropriate risk assessments and traffic surveys have taken place on Langley Bush Road (see full response included as a response to REP4-023 (2) in this document).

#### 4 DAVID LONGFOOT (REP4-024)- POST HEARING SUBMISSION – WORKS QUOTE

	Response	Applicant's Response
1	<p>The quote of £294.000 To reconnect Upton main road to the new roundabout shows how cheaply Upton's problems can be solved.</p> <p>It is only Highways England's intransigent attitude and Peterborough city council's decide to protect the government own land for building purposes preventing this going ahead. This means Upton residents wishing to travel to Peterborough have an extra two mile journey on an unsuitable narrow road behind slow moving agricultural vehicles on a road the amount of traffic will be much greater.</p>	<p>Please refer to response to Point 3.16 of ISH3 on Page 46 of Applicant's Written Summary of Oral Submissions at Hearings (<b>REP4-018</b>).</p>

## 5 ROBERT W REID (REP4-025) – COMMENTS ON ANY SUBMISSIONS RECEIVED BY D3

	Response	Applicant's Response
1	<p>Under Bio diversity TRO10039-000225-6.1 chapter 8 River Nene compensatory floodstorage area, the affects to biodiversity are "slight"</p> <p>This is the removal of topsoil which is then replaced, we do have rare damsel flies along this part of the River Nene bank. Azure Damselflies occur in a few sites around the country this being one of them, however we are concerned light pollution from construction lighting will have over 2 years on the project will affect the population.</p>	<p>Construction lighting will be mitigated so it does not affect notable species, as detailed in the Environmental Management Plan (EMP) (REP2-027).</p> <p>In any event, Azure Damselflies would not be affected as they only appear during the day and would not be present during the darker winter months.</p>
2	<p>Under the heading Invasive Species there is no mention made on the control of Ragwort or Hemlock especially post construction. This is an issue on permanent pasture as its removal becomes very time consuming and labour intensive.</p>	<p>ES Chapter 8 Biodiversity (<b>AS-015</b>) section 8.7.77 details the invasive species that were identified and recorded throughout the survey conducted on-site. Both Ragwort and Hemlock were not identified.</p> <p>The Invasive Native Species (INNS) management plan will be created as part of the second iteration of the EMP and as commitment BD6 of the EMP states, it is to prevent or minimise the introduction or spread of INNS during construction.</p> <p>The Landscape and Ecology Management Plan (LEMP) to be produced as part of the second iteration of the Environment Management Plan (EMP) will detail post construction monitoring and management.</p>

## 6 ROBERT W REID (REP4-026) – DEADLINE 4 SUBMISSION

	Response	Applicant's Response
	<p>Dear Planning Inspectorate,</p> <p>This relates to the River Nene compensatory flood storage area, if Historic England (HE) could release a bit more land on the southern edge of protected land, and took the edge of the new road near the markings of the roundhouse would do the following</p> <ol style="list-style-type: none"> <li>1 Less infill of floodplain and reduce/eliminate a new flood storage area.</li> <li>2 Build more of the road "off line"</li> <li>3 Possibly save the T20 oak tree.</li> <li>4 Provide better route for NUMs</li> <li>5 Reduce geotechnical risks.</li> </ol> <p>This field was last used for arable farming in 2004 before going into a set-a-side farming policy, and could if the farmer wished to be returned to arable farming in the future. There is a similar bit of land near Sutton Wood north of the scheme on arable land.</p> <p>I am forwarding you a copy of a letter sent to the CEO of Historic England in April 2021 when we found out about the replacement flood storage. At the time HE claimed this was a Burial Barrow, their opinion for a number of years and only at the end of the design stage there was a change to this being a round house with maybe a ring ditch. These are quite numerous in the area, there are 3 near Sutton village all in arable fields.</p> <p>Will send via post copy of map and letter as evidence. There was also interaction with Parish Councils with HE that resulted at the time no change of viewpoint. I was only able to take this matter up with HE after National Highways put this into road design and I became "affected landowner"</p> <p>This design is much improved on the original but could be so much better.</p>	<p>The extent of the Scheme within the Scheduled Monument and the potential effects of a different alignment within the Scheduled Monument were discussed at Issue Specific Hearing 2 (Agenda Item 3 Cultural Heritage). The Applicant's responses are summarised in Applicant's Written Summary of Oral Submissions at Hearings (REP4-018)</p>

## 7 ROBERT W REID (REP4-027) – POST HEARING SUBMISSION

	Response	Applicant's Response
1	<p>With reference to AP No 19 NUMs around and under the rail bridge with underpass.</p> <p>As it stands with National Highways (NH) design this brings the NUMs down into a wildlife corridor, the only such safe passage between Sutton Heath SSSI north and Sutton Meadows/CWS to the south. With the support of Wansford and Sutton PC along with Landyke Trust with its trails network we have put a case forward to NH to relocate the station just south of the bridge and next to the rail cutting below the planned dirty water pond. As this plan was developed we also found support from local groups who would be interested in using the facilities, from outdoor painting to environment studies with the new Peterborough University. Many of us feel as a heritage building it should remain in Sutton Parish. However, at present this is not the view of NH and we wish to get them to change this viewpoint, hence we have sent you a hard copy of evidence for you to see and to further your understanding of this issue.</p> <p>The importance of this issue has been highlighted by the recent meeting we had with government land valuer department to discuss "Heads of Terms" My family feel strongly this wildlife corridor should remain open however how can this be done if it also acts as an open door for incorrect usage. The relocation of the station will enhance the usage of the NUM route but also, with a caretaker family, would help to keep this underpass usage in a correct manner with the wildlife corridor open. At present NH have not decided on boundary management but asked for what we would accept. As the station, at the moment, maybe moving out of the area that leaves us with no option but to fence everything off and make it secure. This is why in D3 our request is that this part</p>	<p>Please refer to the Applicant's responses to Points 3.4 to 3.7 to Agenda Item 3 for ISH2, within Applicant's Written Summary of Oral Submissions at Hearings (<b>REP4-018</b>).</p>

	Response	Applicant's Response
	of the project has a more integrated holistic design application. For example why cannot part of the platform not affected by the underpass remain in situ as it acts as an historic marker of the original station location. It could also double up as a mounting block for horse riders proceeding through the underpass. The existing metal gate and piers could become part of the entrance to the station relocation.	
2	What was interesting were comments made on post construction and access, because as it stands with NH design there does not appear to be a clear plan even when we asked for a temporary long term access route for electric service providers, as this line supplies Sutton village.	Undertakers will rely on their usual powers; the Scheme does not affect statutory undertakers access routes and/or it is all dealt with in protective provisions and/or SoCGs.
3	As a community we have worked with NH and it is in all our interests to use and secure the positive aspects of this scheme to offset the negatives, so as a community and myself of this area of land it is most important we convince NH on the merits of relocating the station to the south side of the bridge.	Please refer to the Applicant's responses to Point 3.6 to Agenda Item 3 of ISH2, within Applicant's Written Summary of Oral Submissions at Hearings ( <b>REP4-018</b> ). Please also refer to Point 6.1 to Agenda Item 6 of CAH1, which responds specifically to Mr Reid.



## 8 MILTON PETERBOROUGH ESTATES COMPANY (REP4-028) – COMMENTS ON THE ACTION LIST FOLLOWING SPECIFIC HEARINGS

	Response	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><b>Action-points-ISH2-ISH3-ISH4-CAH1 - Common Response</b></p> <p><b>AP36 Further explanation of choice of roundabout in eastern section rather than other junction options</b></p> <p>We have already submitted our thoughts on the Statutory Consultation process and the villagers of Upton's lack of consultation. Since July 2020 we have discussed alternative options to losing the access onto the A47 at the Upton roundabout. We have been assured we will receive detailed reasons following the detailed design stage with specific reasons against slip roads or connections to the newly sited roundabout and to the exact reason for the current proposed roundabout location.</p> <p>To date we have received no explanations, we therefore welcome this further explanation.</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.</p>	<p>Please refer to the Applicant's responses to Point 3.11 of ISH3, within Applicant's Written Summary of Oral Submissions at Hearings (<b>REP4-018</b>) with regards to a grade separated junction.</p>

	Response	Applicant's Response
2	<p><b>P37 Further consideration of Langley Bush Road between the Drift (Upton) and Sutton Heath Road in relation to suitability of HGV including Agricultural Vehicles</b></p> <p>We have already submitted our thoughts on the Upton Drift /Langley Bush Road Safety. It is worth reiterating 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.</p> <p>That is a significant amount of large agricultural vehicles. In addition, there is an Equestrian commercial business at Lower Lodge so a significant amount of Horse Lorries often HGV's and trailers.</p> <p>Passing places are inadequate for multiple large agricultural vehicles and HGVs especially during the harvest months.</p> <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 unsafe with the increased usage following the closure of Upton Road.</p> <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>Please refer to the Applicant's responses to Points 3.14 - 3.18 of ISH3 within Applicant's Written Summary of Oral Submissions at Hearings (<b>REP4-018</b>) with regards to Langley Bush Road.</p> <p>The Applicant has considered these issues further and provides further comments in the Applicant's Further Response to Actions from Hearings (<b>TR010039/EXAM/9.22</b>), Applicant's response to <b>Action Point 37</b> (see full response included as a response to (<b>REP4-023</b> (2)) of this document on page 10).</p>

	Response	Applicant's Response
3	<p><b>AP 41 Provide a schedule of affected persons identified post submission of the application, setting out dates when they were so identified and when notices were served upon them</b></p> <p>A significant amount of the above are Milton Estate tenants which emphasises the lack of relevant consultation and as the inspector said a possible infringement of their Human Rights so we welcome this investigation of the book of Reference.</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>Please refer to Annex A of Applicant's Written Summary of Oral Submissions at Hearings (<b>REP4-018</b>), which provides a summary of S102 and dates of meetings with tenants.</p> <p>With regards to ECHR rights, please also refer to Point 3.3 of CAH1 within Applicant's Written Summary of Oral Submissions at Hearings (<b>REP4-018</b>).</p>

## 9 SUTTON PARISH COUNCIL (REP4-029) - COMMENTS ON ANY SUBMISSIONS RECEIVED BY D3

	Response	Applicant's Response
1	<p>With the re-engineering of the River Nene floodplain something that should not happen because Historic England claimed for many years a burial barrow near to the existing A47, the point this occurs on the river is a near 90 degree turn. During the majority of the time the river is relatively slow moving as it meanders through this part of the valley however during times of flooding when the dynamics of the river are flowing faster will this now erode the banks much faster especially as its on a sharp bend, near the outflow of Wittering Brook and the land level has been reduced allowing faster water to move onto the new floodplain. Found no references to changes in River dynamics with erosion and deposition from any agency.</p>	<p>These matters were raised in Issue Specific Hearing 2 (ISH2) and the Applicant relies on its response in Applicant's Written Summary of Oral Submissions at Hearings (<b>REP4-018</b>) ISH2 Agenda Item 4.</p>

## 10 SUTTON PARISH COUNCIL (REP4-030 – REP4-035) – POST HEARING SUBMISSIONS PARTS 1 – 6)

	Response	Applicant's Response
REP4-030 Part 1	Sutton Parish Council rejects the negative comments by the applicant on our request to be a formal consultee. To say Parish councils in general are not consulted is an insult to local democracy. This particular project has a number of parameters which the local Parish councils have positively contributed and if had been listened to and considered initially could have save the project and taxpayer a considerable amount of money. Examples being:WCHR route under the A1, Eastern section route alignment and forcing a Historic England engagement taking the route further away from the river valley and the geotechnical risks therein.	These matters were raised in Issue Specific Hearing 4 (ISH4) and the Applicant has nothing further to add to its response in the Applicant's Written Summary of Oral Submissions at Hearings ( <b>REP4-018</b> ) ISH4 Agenda Item 4, Point 4.3.
REP4-031 Part 2	Sutton Parish Council strongly supports the idea stated by Historic England and Peterborough City Council to maintain the Station House, due to be demolished, close to the group setting of the Rail Bridge, gates and Station Masters House as an important local and railway historic asset.	Please refer to Applicant's responses to Points 3.7 – 3.9 of ISH2 within Applicant's Written Summary of Oral Submissions at Hearings ( <b>REP4-018</b> ).  Please also see <b>Common Response G</b> in Applicant's Response to Relevant Representations ( <b>REP1-010</b> ).
REP4-032 Part 3	To confirm that Sutton Parish Council was represented at a meeting held at PCC offices between Upton Community representatives, Chris Griffin and Jonathon Donlevy-National Highways, Lewis Banks-PCC Transport, David Owen-Galliford Try, Gavin Elsey-Ward Councillor and Martin Chilcott-Protect Rural Peterborough. Positive commitment statements were made by PCC and National Highways to make road safety improvements along and from the The Drift -Upton and Langley Bush Road to its connectivity to Sutton Heath Road. PCC and NH seem to backing away from those commitments.	These points were discussed with Sutton Parish Council (SPC) in a meeting on the 8 April 2022, in order to inform a Statement of Common Ground. Discussions are ongoing.  Please also refer to <b>Common Response F</b> within Applicant's Response to Relevant Representations ( <b>REP1-010</b> ).

	Response	Applicant's Response
REP4-033 Part 4	If the Upton Road from the existing Sutton roundabout is to be closed then Sutton Parish Council supports the idea of Upton road being used as a WCHR route with an underpass under the new dual-carriageway. This is a relatively simple and cost effective way to keep the close historic and services connectivity for Upton to Sutton, Ailsworth and Castor.	Please refer to <b>Common Response C</b> in Applicant's Response to the Relevant Representations ( <b>REP1-010</b> ).
REP4-034 Part 5	<p>Sutton Parish Council would comment that although the general improvements to WCHR routes currently within the scheme are most welcome, issues which were highlighted to NH in 2019 regarding the A1 crossing either via the underpass or adjacent to the A47 are still not satisfactory.</p> <p>What is puzzling that if the gantry barrier alongside the A47 westbound is not safe to make the necessary safety modifications what happens if it is hit by a vehicle, is the A47 overpass to be closed to vehicular traffic. If it is unsafe to modify then it should be made more robust whether the A47 dualling goes ahead or not.</p>	<p>The Applicant has responded to concerns about the A1 crossing underpasses and the provision of WCH facilities on the overbridge within <b>Common Response A</b> in Applicant's Response to the Relevant Representations (<b>REP1-010</b>).</p> <p>A Vehicle Restraint System (VRS) is provided on the southern frontage of the A1 overbridge and this existing facility ensures the safety of vehicular traffic. Dedicated facilities for WCH are not provided on the A1 overbridge, and the Applicant notes that the height of the existing parapet does not comply with Design Manual for Roads and Bridges (DMRB) standards for the provision of a cyclist facility.</p>
REP4-035 Part 6	Sutton Parish Council would comment that the more we find on the weaknesses in the traffic modelling verses on the ground observations of traffic congestion at the west Wansford roundabout will get worse and improvements to this must be made part of this scheme else the benefits of the upgrade will be severely reduced. The same applies for potential traffic flow increase along Langley Bush Road and the reasons why we are so concerned by the lack of improvements along this route.	<p>Please refer to Applicant's responses to Points 3.5 of ISH3 within the Applicant's Written Summary of Oral Submissions at Hearings (<b>REP4-018</b>).</p> <p>Please also see the Applicant's response to <b>Action Point 29</b>, within the Applicant's Further Response to Actions from Hearings (<b>TR010039/EXAM/9.22</b>): "A Technical Note addressing this matter has been submitted at Deadline 5 – please refer to Annex C to this document - Wansford Traffic Model Calibration and Peterborough Road Sensitivity Test Technical Note".</p> <p>With regards to traffic flow on Langley Bush Road, please refer to Point 3.13 of ISH3 within the Applicant's Written Summary of Oral Submissions at Hearings (<b>REP4-018</b>), and also the Applicant's response to <b>Action Point 37</b>,</p>

	Response	Applicant's Response
		within the Applicant's Further Response to Actions from Hearings ( <b>TR010039/EXAM/9.22</b> ), (see full response included as a response to REP4-023 of this document on page 10).

## 11 FIGHT 4 UPTON (REP4-036) – POST HEARING SUBMISSIONS INCLUDING WRITTEN SUBMISSIONS OF ORAL CASE

	Response	Applicant's Response
1	We have 3 concerns	No response required.
2	1. No consultation on relocation of roundabout and closing Upton Road.	The Applicant has responded to Fight4Upton on this matter previously. Please refer to <b>Common Response E</b> in Applicant's Response to the Relevant Representations ( <b>REP1-010</b> ).
3	2. Only remaining route to A47 from Upton is dangerous.	Please refer to <b>Common Response F</b> of Applicant's Response to the Relevant Representations ( <b>REP1-010</b> ).
4	3. Connectivity for walking, cycling and riding. We want a route and a bridge over the A47 to connect Upton to Castor, Ailsworth & Upton. Historic social connections with these parishes.	Movement is still enabled for pedestrians, cyclists and horses and the historical context is not obscured as it is preserved in the historical record.  Please refer to <b>Common Responses C and F</b> of Applicant's Response to Relevant Representations ( <b>REP1-010</b> ).

## 12 NATURAL ENGLAND (REP4-037) – ANY FURTHER INFORMATION REQUESTED BY THE EXA UNDER RULE 17 OF THE EXAMINATION RULES

	Response	Applicant's Response
1	Please find below our responses to the actions arising from Issue Specific Hearing 2 - Environment, which took place on 15 March 2022, with Natural England in attendance.	No response required.
2	<p>20. Natural England to provide a response to ExQ1.2.6 Construction and operational impacts on ecology</p> <p>a) Do IPs agree with the Applicant's assessment of impacts during both construction and operation as set out in Tables 8-9 and 8-10 of Chapter 8 of the ES [AS 015]?</p> <p>b) If not, could you explain why not and what needs to be amended?</p> <p><i>a) Natural England is satisfied with the Applicant's assessment of impacts during both construction and operation as set out in Tables 8-9 and 8-10 of Chapter 8 of the ES.</i></p>	This comment is noted.
3	<p>21. Natural England to review its records and provide information as to why the Sutton Heath and Bog SSSI was designated.</p> <p><i>Natural England is currently reviewing habitat mapping drawings of Sutton Heath and Bog SSSI from 1985 and 1987, as well as the criteria for selection of the SSSI from 1984. We will provide a full response by D5.</i></p>	This comment is noted.

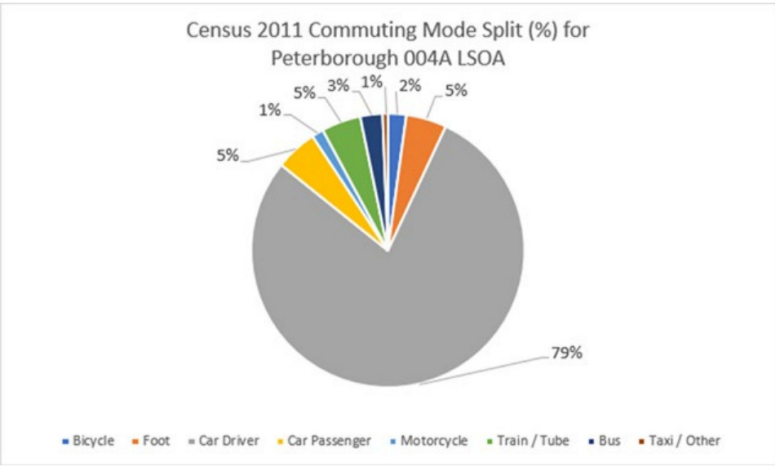


### 13 PETERBOROUGH CITY COUNCIL (REP4-038 – REP4-040) - DEADLINE 4 SUBMISSIONS

	Response	Applicant's Response
REP4-038	A47 Email correspondence CCC and EA	No response required.
REP4-039	A47 Modelling - LLFA Comments	No response required.
REP4-040 1	<p><b>Issue Specific Hearing Action Points Application by Highways England (now National Highways) for an Order Granting Development Consent for A47 Wansford to Sutton Dualling (TR010039)</b></p> <p><u>Response by Peterborough City Council to Actions arising from: Issue Specific Hearing 2 – Environment</u></p> <p>To clarify this response has been produced by Cambridgeshire County Council's LLFA on behalf of PCC as part of an ongoing service level agreement.</p> <p>Action Point 13: Provide explanation as to why Whittering Brook needs to be throttled near to River Nene</p> <p>EXQ1 1.12.10a – Wittering Brook Crossing</p> <p>Given that the whole of the A47 culvert is proposed to be replaced, can the Applicant explain if there is a particular reason why only culvert options were assessed rather than others, for example, a clear span bridge?</p> <p>During the Issue Specific Hearing 2 (ISH2) on</p>	No response required.

	Response	Applicant's Response
	<p>Environmental Matters on 15th March 2022, the Examiner stated that the applicant's response was effectively that the city council requested this to ensure that the water flow was for throttled. The Examiner requested for PCC to provide an explanation as to why Wittering Brook needs to be throttled near to the River Nene</p> <p>LLFA Response: Paragraph 13.4.22 of Chapter 13 of the ES, states "the Environment Agency and Peterborough City Council were further consulted in November 2020 to discuss the Wittering Brook A47 culvert and associated floods risk. They noted the following... removing the throttle created by the existing culvert was agreed to be the preferred option..."</p> <p>Unfortunately, at this time we are unable to obtain information to the contrary from PCC as we have limited access to file and email archives due to the current member of staff being on annual leave. Therefore, we request that the response due date for this question be extended to deadline D5 (20 April 2022).</p>	
REP4-040 2	<p><b>Action Point 15: Provide details of A1 stream model choice</b></p> <p>ExQ1 1.12.7 – Hydraulic Modelling: Paragraph 13.7.63 of Chapter 13 of the ES [AS-017] indicates that Hydraulic modelling of the A1 Mill Stream culvert was undertaken using HY-8 v7.6 (Federal ExQ1 issued: 18 January 2022 Responses Due: 15 February 2022 A47 WANSFORD TO SUTTON DUALLING - 78 - ExQ1 Question to: Question: Highway Administration, 2020). It is stated in the Flood Risk Assessment [APP-128] that this was agreed with PCC. Can</p>	<p>HY-8 was used for the proposed extension of the existing A1 culvert conveying the watercourse known as Mill Stream. The proposals are for a straightforward extension of the culvert at its downstream (eastern) end. The downstream portion of the culvert has a larger diameter than the upstream portion. As such, the upstream portion acts as the control on flow rates through the culvert.</p> <p>Given the relatively straightforward nature of the proposals and the uniform nature of the watercourse channel in this area, a more simplified modelling approach was deemed appropriate.</p>

	Response	Applicant's Response
	<p>the Applicant and PCC explain why they believe that this model is appropriate for hydraulic modelling of this crossing and what implications it has for the hydraulic modelling of Wittering Brook.</p> <p>PCC Response:</p> <p>We have reviewed the previous correspondence between the applicant and PCC's LLFA, and we are unable to find any such agreement over the use of the HY-8 v7.6 model. Therefore, PCC is not able to provide a response in relation to the examiner's question. As the LLFA, the correspondence shows comments were provided in relation to the culvert arrangement and the outputs of the modelling.</p> <p>However, in terms of the review of the type of modelling and hydrology, the LLFA relied on the expertise and opinion of the Environment Agency on the matter. Please see the email chain between the applicant, Cambridgeshire County Council (CCC) and the Environment Agency in relation to the flood modelling to confirm the above. To clarify, Cambridgeshire County Council's LLFA provided comments on behalf of PCC's LLFA as part of an existing service level agreement.</p>	<p>The HY-8 Culvert Hydraulic Analysis Program is able to calculate the headwater (upstream) elevation and water surface profiles along a culvert crossing. The program uses widely accepted calculation methods that can simulate a variety of conditions of flow in a culvert including: inlet control, outlet control and road level surcharge conditions. The program allows the user to amend culvert dimensions (including length, level and roughness) and as such, is suitable for use in comparing baseline vs proposed scenarios.</p> <p>The analysis for Mill Stream used topographic survey data of the upstream and downstream channel cross-section as well as surveyed levels and dimensions of the existing culvert.</p> <p>The above approach was deemed acceptable given the nature of the proposals at Mill Stream.</p> <p>The approach to the assessment for the A1 Mill Stream culvert was discussed during a meeting with PCC on 6<sup>th</sup> May 2020 where it was agreed that a "...a minimal assessment approach to the A1 Mill Stream culvert would be appropriate given that the works here will be a relatively straightforward extension of the existing culvert." It was also agreed that "This would not involve detailed hydraulic modelling (<i>post meeting note: for example, hydraulic assessment using HY-8</i>)."</p>

	Response	Applicant's Response
REP4-040 3	<p><u>Response by Peterborough City Council to Actions arising from: Issue Specific Hearing 3 – Traffic &amp; Transport and Socio-Economics</u></p> <p><b>Action Point 35: Information held on extent of use of roads by NMUs to north of A47 at present</b></p> <ul style="list-style-type: none"> <li>Do we have any data as to the extent of NMU's for the roads north of the A47?</li> </ul> <p>We do not hold any NMU data for the roads north of the A47 unfortunately. However, the Census 2011 data for the Peterborough 004A LSOA, which covers much of Langley Bush Road, shows the mode split for commuters and has been summarised below.</p>  <p>Census 2011 Commuting Mode Split (%) for Peterborough 004A LSOA</p> <p>79% Car Driver, 5% Car Passenger, 5% Bicycle, 5% Foot, 2% Motorcycle, 1% Train / Tube, 1% Bus, 3% Taxi / Other</p>	No response required.
REP4-040 4	<ul style="list-style-type: none"> <li>Langley Bush Road - Do we have any data on the traffic split for this road and the HGV use?</li> </ul> <p>Please see the below data for Langley bush road (top left)</p>	The Applicant has referred to this data in its response to <b>Action Point 37</b> within Applicant's Further Response to Actions from Hearings ( <b>TR010039/EXAM/9.22</b> ), (see full response included as a response to REP4-023 of this document on page 10).

Response	Applicant's Response																																																
<p>and Walcot Road East (top right) which is another local road similar in nature. The vehicle split is typical of a rural road with agricultural traffic in the west of the authority area and for comparison purposes we have also provided splits based on</p> <p>2009 AADT data from the DfT for High Field Road to the west of Langley Bush Road. We have also provided The National Road Traffic Forecasts for Minor Roads in the East of England Region which show a HGV% figure of 1.3% as shown below</p>																																																	
<div><div><p>Bi-directional Vehicle Split (%) on Langley Bush Road, Helpston</p><table border="1"><thead><tr><th>Vehicle Type</th><th>Percentage (%)</th></tr></thead><tbody><tr><td>Car</td><td>85.9%</td></tr><tr><td>LGV</td><td>10.8%</td></tr><tr><td>PSV</td><td>0.3%</td></tr><tr><td>Motorcycle</td><td>0.7%</td></tr><tr><td>HGV Total</td><td>2.4%</td></tr></tbody></table></div><div><p>Bi-directional Annual Average Daily Traffic Vehicle Split (%) on High Field Road, West of Langley Bush Road</p><table border="1"><thead><tr><th>Vehicle Type</th><th>Percentage (%)</th></tr></thead><tbody><tr><td>Car</td><td>92.0%</td></tr><tr><td>LGV</td><td>5.1%</td></tr><tr><td>PSV</td><td>0.0%</td></tr><tr><td>Motorcycle</td><td>0.0%</td></tr><tr><td>HGV</td><td>2.9%</td></tr></tbody></table></div><div><p>Bi-directional Vehicle Split (%) on Walcot Rd East, Near Ufford</p><table border="1"><thead><tr><th>Vehicle Type</th><th>Percentage (%)</th></tr></thead><tbody><tr><td>Car</td><td>87.0%</td></tr><tr><td>LGV</td><td>9.9%</td></tr><tr><td>PSV</td><td>0.1%</td></tr><tr><td>Motorcycle</td><td>1.1%</td></tr><tr><td>HGV Total</td><td>1.9%</td></tr></tbody></table></div><div><p>National Road Traffic Forecasts for East of England - Vehicle Splits (%) for Minor Roads</p><table border="1"><thead><tr><th>Vehicle Type</th><th>Percentage (%)</th></tr></thead><tbody><tr><td>Car</td><td>81.9%</td></tr><tr><td>LGV</td><td>15.9%</td></tr><tr><td>PSV</td><td>0.9%</td></tr><tr><td>HGV</td><td>1.3%</td></tr><tr><td>Motorcycle</td><td>0.9%</td></tr></tbody></table></div></div>	Vehicle Type	Percentage (%)	Car	85.9%	LGV	10.8%	PSV	0.3%	Motorcycle	0.7%	HGV Total	2.4%	Vehicle Type	Percentage (%)	Car	92.0%	LGV	5.1%	PSV	0.0%	Motorcycle	0.0%	HGV	2.9%	Vehicle Type	Percentage (%)	Car	87.0%	LGV	9.9%	PSV	0.1%	Motorcycle	1.1%	HGV Total	1.9%	Vehicle Type	Percentage (%)	Car	81.9%	LGV	15.9%	PSV	0.9%	HGV	1.3%	Motorcycle	0.9%	
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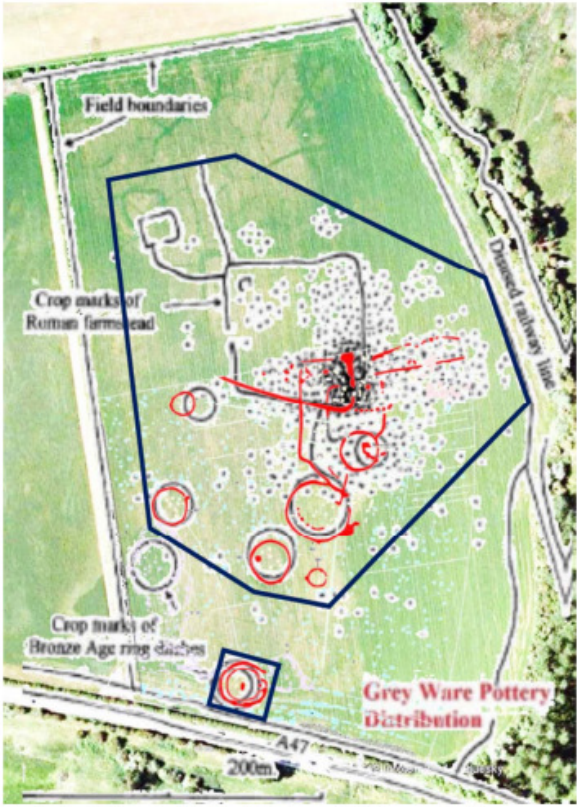
## 14 WANSFORD PARISH COUNCIL (REP4-041 – REP4-044) - DEADLINE 4 SUBMISSIONS

	Response	Applicant's Response
REP4-041 1	<p>ISH2 Agenda Item 7 Geotechnical Risk</p> <p>In Issue Specific Hearing 2, the matter of geotechnical risk in the area of the escarpment down to the river Nene was discussed. At the end of the hearing, National Highways' counsel stated that there would be no problem as National Highways knew how to build roads.</p> <p>As we are sure the Examining Authority is well aware, geotechnical issues are common in the construction of roads however carefully they are designed. Locally there have been recent examples on the A16 Peterborough to Crowland road and the A142 Ely Southern Bypass. Both these roads were carefully designed but both suffered construction delays of more than a year because of geotechnical problems close to rivers. There are numerous other examples of geotechnical problems causing difficulties with roads including to local one of the barriers on the river side of the A47 having to be reset at regular intervals.</p>	<p>The Applicant cannot comment on the geotechnical challenges of other road schemes.</p> <p>It is acknowledged that there are geotechnical challenges to overcome at detailed design. The Applicant is aware of those potential risks, as they were highlighted within the Applicant's Stage 3 Ground Investigation Report (<b>REP1-009</b>).</p> <p>As part of the detailed design, information is being gathered to further understand these risks so that mitigation measures can be put in place as part of the detailed design process.</p> <p>This is in the form of a supplementary ground investigation which is being undertaken. This will assist in the validation of the ground models adopted for detailed design.</p>
REP4-041 2	<p>Highways England has updated the guidance on geotechnical risk twice in the last four years, clearly showing that it is a live issue.</p> <p>The road alignment chosen by National Highways exposes the project to the risk of cost overruns and delays as a result of geotechnical risks while an alternative alignment gets away from these risks completely.</p>	<p>Please refer to Applicant's responses to Points 4.12, 6.2, 7.1 and 7.2 of ISH2 within the Applicant's Written Summary of Oral Submissions at Hearings (<b>REP4-018</b>). Please also refer to Applicant's Response to <b>Action Point 27</b> within Applicant's Further Response to Actions from Hearings (<b>TR010039/EXAM/9.22</b>) which discusses the geotechnical risk and the construction period.</p> <p>National Highways guidance on managing geotechnical risk (DMRB CD 622) is being followed.</p>

	Response	Applicant's Response
		The Applicant is aware of the potential geotechnical. Moving the alignment further north might mitigate some of this risk, but that option is not feasible and there is no merit in further consideration of it. As the Applicant has explained, it, the ExA and the SoS are all obliged to comply with statute law. As the proposed northern alignment would require significant encroachment into the Scheduled Monument, it is not an appropriate route, whatever the asserted benefits of it might be.
REP4-041 3	If it were decided to widen the A47 at some future date, the design engineers would be faced with a choice of destroying the southern feature of the Scheduled Monument or constructing a large embankment much closer to the river. This would have a very high cost and a considerable construction risk.	There are no requirements for the design to accommodate future widening. It would be inappropriate and unlawful to significantly impact a Scheduled Monument as a result of an unknown future requirement.
REP4-042 1	<p>ISH2 Agenda Item 3 The Scheduled Monument</p> <p>In Issue Specific Hearing 2, Historic England continued to oppose the option of the A47 taking a route between the southern feature and the rest of the Scheduled Monument.</p> <p>Historic England were unable to describe why such a route would damage the Scheduled Monument, their only argument being that it would damage the "landscape" of the monument. As before, they did not provide a definition of what they meant by landscape in this context. The repeated use of this term without any definition points to it simply being jargon with no real meaning.</p> <p>Historic England expressed concern that the proximity of the new road to the southern feature of the monument would risk damaging it. Using the route between the features of the monument, gives a much greater clearance</p>	Please refer to the Applicant's responses to ISH2, Points 3.1 – 3.3 of the Applicant's Written Summary of Oral Submissions at Hearings ( <b>REP4-018</b> ).

	Response	Applicant's Response
	<p>to all features than the current alignment.</p> <p>Historic England made several references to the shape of the scheduled monument following the contours of the land and the monument occupying a promontory at the end of the elevated area to the west of the site. When you examine the features of the site as shown in the Wansford Parish Council document submitted at Deadline 2, and copied below, it is clear that this is not correct.</p> <p>Following the contour line, as Historic England have tried to do, actually excludes an area of likely high interest from the Scheduled Monument at its eastern edge.</p> <p>In a meeting with the parish councils, Historic England stated that they relied on the analysis done by Wansford Parish Council when reviewing the Scheduled Monument. As the attached diagram was a key part of that analysis, they presumably do not dispute the features shown.</p> <p>See diagram below</p>	



	Response	Applicant's Response
	 <p>Note that the original mapping of the Scheduled Monument included an extra ring which was disproved by the geophysical survey.</p>	
REP4-043 1	<p>ISH3 Agenda Item 3 Traffic Modelling of the Wansford Western Roundabout</p> <p>In Issue Specific Hearing 3, the Examining Authority raised the matter of the modelling of the traffic flows on the Wansford Western Roundabout. He correctly observed that the actual measured 2019 traffic flows</p>	<p>Please refer to <b>Annex C - Wansford Traffic Model Calibration and Peterborough Road Sensitivity Test Technical Note</b> within the Applicant's Further Response to Actions from Hearings – Annexes (<b>TR010039/EXAM/9.23</b>) submitted at Deadline 5.</p>

	Response	Applicant's Response
	<p>northbound on Old North Road did not correspond to the flows predicted by the traffic model. When National Highways (NH) were challenged on this, they seemed to respond that the results of the modelling had to be accepted even though they did not match reality.</p> <p>Wansford Parish Council (WPC) alerted NH to this problem more than two years ago. The process by which NH has arrived at their predicted traffic flows is complex and clearly there is an error somewhere. WPC has repeatedly suggested that NH do a sensitivity test either by taking the base year Old North Road flows and applying a simple growth factor or taking all the base year flows and simply increasing them all by the average of the flow increases predicted by the existing model. Either of these simplified tests would give a "sanity check" on the modelling. In the hearing, NH seemed to state that such sensitivity tests could not be done.</p> <p>In their earlier submission, NH claimed that adding an additional exit lane eastbound from the western roundabout would improve the flow by giving more spaces for vehicles exiting Old North Road. In reality the opportunities to exit Old North Road are the result of gaps in the flow of traffic entering the roundabout westbound and gaps in the flow entering the roundabout from the A1 and then heading westbound. Neither of these flows is influenced by the eastbound exit lanes.</p> <p>Numerically the main delays on the western roundabout are to vehicles entering the roundabout heading east along the A47. This flow is interrupted by vehicles arriving westbound on the A47 and then heading north up the A1 and by traffic leaving Old North Road and either going</p>	

	Response	Applicant's Response
	<p>north or east, as the majority of it does.</p> <p>Clearly the modelling of the Wansford Western roundabout is suffering from the “rubbish in rubbish out” problem as the inputs and the outputs do not correspond with reality or common sense.</p> <p>The results of this modelling contribute to the overall travel time through the scheme and therefore have the potential to undermine the benefits of the scheme.</p>	
REP4-044 1	<p>ISH4 Agenda Item 4 Consultation with Parish Councils</p> <p>In Issue Specific Hearing 4, the matter of ongoing consultation with Wansford Parish Council (WPC) and Sutton Parish Council (SPC) was raised under Agenda Item 4. This agenda item was the result of an earlier submission by SPC.</p> <p>The National Highways (NH) response to this issue was that they would “strongly oppose ongoing consultation with the Parish Councils on the grounds of delay”. This shows a considerable level of arrogance and a complete disregard for government policy on democratic representation.</p> <p>Parish Councils are the elected representatives of their communities and it is government policy that matters should be dealt with at the lowest level competent for the task. At present Peterborough City Council is undergoing something of a financial and staffing crisis and as a result they have not been able to devote very much time to the project. This gap has been filled by the Parish Councils</p>	<p>The Applicant has engaged, both formally and informally, with the Parish Councils throughout the development of the Scheme, as shown in the Consultation Report (<b>APP-023</b>) and its Annexes (<b>APP-024 – APP-038</b>).</p> <p>The Applicant is continuing to engage with the Parish Councils and will continue to do so throughout the detailed design and construction of the Scheme. The Applicant is currently undertaking meetings with WPC and SPC in order to develop Statements of Common Ground (SoCGs).</p> <p>As set out in the Applicant's responses to ISH4, Point4.3 in the Applicant's Written Summary of Oral Submissions at Hearings (<b>REP4-018</b>) the Applicant confirmed that consultation with parish councils in respect of Requirements is not provided for in any other DCO it has come across and is therefore not appropriate. The Applicant strongly resisted the Wansford and Sutton Parish Councils being consulted on the Requirements.</p>

	Response	Applicant's Response
	<p>who are able to call on significant technical resources from within their communities. Many of the major consulting engineering companies have offices in Peterborough and many of their staff live in the villages to the west of the city.</p> <p>Throughout the A47 Wansford to Sutton Dualling project, the two Parish Councils have taken a keen interest in scheme as it has developed and we have raised numerous issues on behalf of our communities. On many occasions we have pointed out problems in the work done by NH and this has resulted in a change of route, significant improvements in the Non-Motorised User provision and other changes to the scheme.</p> <p>The Parish Councils have always tried to work constructively with NH but they have often disregarded the points that we have made and excluded us from meetings where we could have made a significant contribution.</p>	
REP4-044 2	As an example of our contribution, in ISH3, the Examining Authority noted the inconsistencies in the traffic modelling of the Wansford Western Roundabout and asked NH to check this. The problems with this modelling were raised by Wansford Parish Council more than 2 years ago but NH declined to do anything about it. Now the project may be delayed while the modelling is corrected.	Please refer to <b>Annex C - Wansford Traffic Model Calibration and Peterborough Road Sensitivity Test Technical Note</b> within the Applicant's Further Response to Actions from Hearings – Annexes ( <b>TR010039/EXAM/9.23</b> ) submitted at Deadline 5.
REP4-044 3	Wansford Parish Council requests that the Examining Authority recommends to the Secretary of State that National Highways continue to consult with Wansford and Sutton Parish Councils as the scheme completes the DCO process and hopefully goes into detailed design and construction.	<p>As discussed in the response above to (<b>REP4-044</b>) part 2, the Applicant is currently undertaking meetings with WPC and SPC in order to inform SoCGs.</p> <p>The Applicant will continue to engage with the Parish Councils Applicant throughout the detailed design and construction of the Scheme.</p>

	Response	Applicant's Response

## 15 ROBERT W REID (REP4-045) - DEADLINE 4 SUBMISSION – LATE SUBMISSION ACCEPTED AT THE DISCRETION OF THE EXAMINING AUTHORITY

	Response	Applicant's Response
1	<p>Dear Sir / Madam,</p> <p>This is a copy of a letter sent to HR which did start the process of the final design of the road being taken away from the River Nene.</p> <p>The question is can the road scheme be improved with a little more give from HR.</p>	<p>Mr Reid's letter was not the reason that the Scheme was moved away from the River Nene. The move was due to a combination of factors including a significant amount of feedback from the statutory consultation, as set out in the Scheme Design Report (<b>AS-026</b>) and Design Development Report 2020 (<b>AS-032</b>).</p> <p>Significant consultation has taken place with Historic England throughout the development of the Scheme – see <b>Common Response H</b> of Applicant's Response to the Relevant Representations (<b>REP1-010</b>).</p>
2	<p>Letter content: <i>(Letter is not dated)</i>.</p> <p>Dear Mr Wilson <i>(CEO Historic England)</i></p> <p>I am writing to you as to make you aware of a situation that has arisen due to the geography and environmental constraints in this area. I have with others been in discussion with Dr Will Fletcher and so far, no compromise or even solid justification has been offered up on the field boundary on the southern edge of land with Status on Sacrewell Farm.</p> <p>This has resulted in Highways England having to squeeze the new road and cycleway between the land with Status and the River Nene. They now have to infill a large part of the floodplain and remove 3 veteran oaks to accommodate this new road. This is going to result in a large area of floodplain to</p>	<p>The Applicant has no further response.</p>

	Response	Applicant's Response
	<p>be relocated on a County Wildlife Site an area with significant rare Damsel insect s plus the removal of the oaks will expose a section of the Nene River and valley to light air and noise - pollution, due to the bend in the road.</p> <p>Everyone involved in this project have shown some compromise, except so far Historic England and I understand you are being re-approached by Highways England to find a way of avoiding this environmental carnage. The reason for this letter is to ensure you know of this situation as CEO of Historic England, and to make you aware local parish councils and public are becoming more aware of this problem and hope government agencies can at least resolve and sort this issue out.</p> <p>I do hope a compromise will be found as none of us want a modern-day monument constructed on the side of the River Nene doing lasting environmental damage. I am sure Dr Will Fletcher will fill you in with greater detail as I understand he has the facts about the site.</p>	