

A47 Wansford to Sutton Dualling

Scheme Number: TR010039

Volume 9 **9.26 Applicant's Comments on Deadline 5** **Submissions**

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

Planning Act 2008

May 2022

Deadline 6

Infrastructure Planning

Planning Act 2008

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

A47 Wansford to Sutton
Development Consent Order 202[x]

**9.26 APPLICANT'S COMMENTS ON DEADLINE 5
SUBMISSIONS**

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1 INTRODUCTION

- 1.1.1 The Development Consent Order (DCO) application for the A47 Wansford to Sutton Scheme was submitted on 05 July 2021 and accepted for examination on 02 August 2021.
- 1.1.2 The purpose of this document is to set out National Highways' (the Applicant) comments on Deadline 5 submissions.

2 PETERBOROUGH CITY COUNCIL (REP5-024 AND REP5-025)

	Response	Applicant's Response
REP5-024 Response by Peterborough City Council to Actions arising from: Issue Specific Hearing 2 – Environment		
1	<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><i>EXQ1 1.12.10a – Wittering Brook Crossing</i></p> <p><i>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?</i></p> <p>During the Issue Specific Hearing 2 (ISH2) on 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 throttled. The Examiner requested for PCC to provide an explanation as to why Whittering Brook needs to be throttled near to the River Nene.</p> <p>PCC LLFA Response: Please see the attached meeting minutes (dated 06/05/2020) which states that PCC previously requested for the works to the A47 Whittering Brook culvert simulate the current situation with no change in flow rates passing through the culvert. Furthermore, Item 3.4 of the minutes specifies Sweco's requirement of a throttle to prevent any changes in the flow rates.</p> <p>However as per the Section 13.4.22 of ES Chapter 13 Road Drainage and the water environment, in November 2020 PCC and the Environment Agency were further consulted on</p>	<p>Please refer to the Applicant's response to Point 4.6 of Issue Specific Hearing 2 (ISH2) in the Applicant's Written Summary of Oral Submissions at Hearings (REP4-018).</p>

	Response	Applicant's Response
	the A47 Wittering Brook culvert proposals, where the agreed preferred option was for the 'throttle' to be removed as the modelling demonstrated there was minimal impact downstream.	
REP5-025 - Minutes of meeting 22 April 2019		
1	Minutes of meeting 22 April 2019	The meeting minutes were produced by the Applicant. The Applicant has no response to make.

3 WANSFORD PARISH COUNCIL (REP5-027 AND REP-028)

	Response	Applicant's Response
REP5-27 - Comments on Document 9.16 Applicant's Response to Written Representations		
1	<p>The applicants written response to written representations raises a number of issues as set out below:</p> <p>Section 3 Responses to Wansford Parish Council (Rep2-071)</p> <p>Ref 2.1 Purpose of the Document</p> <p>The Applicants response makes reference to the minutes of the Preferred Route Decision Meeting in Appendix O of document AS-031. It is very clear from the minutes that this meeting applied the wrong decision criteria when considering the impact of Option 3 (the northern route) on the Scheduled Monument. The entire train of errors in the selection of the route stems from this single Error.</p>	<p>This generalised criticism fails to explain what, in Wansford Parish Council's view, was the appropriate decision criteria, or the legal basis upon which it is asserted that the Applicant's approach was wrong.</p> <p>In any event, it has no bearing on the ExA or Secretary of State's consideration of the Application. As has been explained by the Applicant, the statutory bar is determinative that the northern route advocated by Wansford Parish Council is not capable of consent.</p> <p>As set out in the Scheme Assessment Report (AS-030), all potential route options were ranked based on the combination of a number of different criteria following an appraisal, in order to assess which was the preferred route. These criteria included economic, environmental and social impacts.</p>
2	<p>Ref 2.3 The Route</p> <p>The Applicant spent a great deal of time talking to Wansford Parish Council but they did not listen to what was said. This is not consultation.</p>	<p>Please refer to Common Response E within the Applicant's Response to Relevant Representations (REP1-010).</p> <p>The requirement in law is that the Applicant consults, and the Applicant has a duty to have regard to relevant responses. The Applicant's approach is described in the Consultation Report (AS-011).</p> <p>As has been noted, the Applicant consulted extensively Wansford Parish Council. In response to that consultation and feedback, the Scheme design was further developed, moving the alignment north. (See Scheme Design Report (AS-026) and the Design Development Report 2020 (AS-032)).</p>

	Response	Applicant's Response
3	<p>Ref 3.1 National Highways The Applicant states that cutting through the Scheduled Monument would result in substantial harm. This statement is not based on any evidence and it is quite clear that when the route decision was made, no attempt had been made to look at the features of the Scheduled Monument. It was just referred to as a single entity. Again there is a vague mention of "negative space" but if this criteria were applied, it would be impossible to build any road scheme anywhere in the country.</p> <p>On page 12 it is stated that there was extensive consultation with Wansford Parish Council but this does not explain why National Highways deliberately blocked any discussion including NH, PCC, the Parish Councils and Historic England. The Parishes tried to make such a meeting happen but NH blocked it. This point is not responded to by the Applicant.</p>	<p>Please refer to REP2-074 from Historic England, which discusses the harm to the designated asset.</p> <p>With regards to the Scheduled Monument's significance and negative space, please also refer to the Applicant's response to Agenda Item 3 – Point 3.1 within the Applicant's Written Summary of Oral Submissions at Hearings (REP4-018).</p> <p>The Applicant has consulted with Wansford Parish Council, both informally and formally throughout the development of the Scheme. The Applicant also consulted and held meetings with statutory consultees. Details of consultation are set out in the Consultation Report (AS-011) and its Annexes (APP-024 – APP-038).</p>
4	<p>Ref 3.2 Historic England The Applicants responses are irrelevant to the issues raised by Wansford Parish Council.</p>	<p>The Applicant considers that it has addressed comments relating to the location and extent of the Scheduled Monument in previous submissions, including, but not limited to the Applicant's responses to ISH2, Points 3.1 – 3.3 of the Applicant's Written Summary of Oral Submissions at Hearings (REP4- 018), and the Applicant's Response to Wansford Parish Council Point 3.1, within the Applicant's Response to Written Representations (REP3-026).</p> <p>Submissions have also been made into the Examination by Historic England on these matters. Please refer to REP2-074 from Historic England, which discusses the harm to the designated asset.</p>
5	<p>Ref 4 Geotechnical Risk The Applicants response outlines the standard response to geotechnical risk but, although these measures reduce the risk, they do not eliminate it. The measures they outline as possible solutions will be expensive and will increase the impact of the scheme both in terms of construction disruption and embedded</p>	<p>Please refer to Applicant's response to Point 7.1 of ISH2 within Applicant's Written Summary of Oral Submissions at Hearings (REP4-018).</p> <p>The Applicant acknowledges that geotechnical risk will never be completely eliminated.</p>

	Response	Applicant's Response
	carbon.	
6	<p>Section 4 Wansford Parish Council (REP2-072) Ref 1.1 Purpose of the Document The Applicant claims that the Western Roundabout is outside the scope of the Scheme. This is directly contradicted by the inclusion of modifications to the roundabout in earlier versions of the Scheme.</p>	<p>Please refer to the Applicant's response to Action Point 28 within the Applicant's Further Response to Actions from Hearings (REF5-020). This document states:</p> <p><i>"Out of scope in context means simply that it does not form part of the Scheme for which the Applicant has applied for development consent, and the Applicant has submitted the Application for the Scheme which it considers to be appropriate and cost effective for this stretch of road. Plainly, there may be other improvements and upgrades in the immediate area which the Applicant might have included within the Scheme, but it has brought forward the Scheme for which it seeks development consent."</i></p>
7	<p>Ref 1.2 Why this document is needed The applicant makes great play of the fact that a new version of the traffic modelling has been produced (REP2-026). This new document still contains the same claim that the traffic on Old North Road will almost halve between 2015 and 2019, a claim that is directly contradicted by site measurements. The reduction comes about because of the application of a very crude modelling algorithm based on just time and distance. It takes no account of driver behaviour and this is why the results are implausible.</p> <p>Wansford Parish Council have suggested that a very simple sensitivity test based on the Old North Road Traffic growing in line with the other flows. The Applicant claims that this cannot be done because of the need to balance the flows in the model. Because only a single flow is being adjusted, the model can be balanced by the use of a simple spreadsheet within a few minutes.</p> <p>The Applicant seems to believe that the output from a relatively</p>	<p>A Technical Note addressing this matter was submitted at Deadline 5 – please refer to Annex C - Wansford Traffic Model Calibration and Peterborough Road Sensitivity Test Technical Note, of the Applicant's Further Response to Actions from Hearings – Annexes (REP5-021).</p>

	Response	Applicant's Response
	<p>crude assessment methodology is the only possible set of figures to use. In view of the Applicants record of complete failure of traffic</p> <p>modelling in this area (in relation to the upgrade of the eastern roundabout a few years ago), going with just a single set of figures is somewhat rash.</p>	
8	<p>Ref 3.2 An alternative approach It is clear from the Applicants response that they have misunderstood the intention of the alternative. No one has suggested two lanes in the western roundabout. The two lanes are for the traffic light option. They have also raised the issue of the bridge being a constraint. This is not true.</p>	<p>The reference to the constraint on the bridge is in relation to the single lane westbound. Two lanes were considered, please refer to Applicant's Response to ExQ 2.11.2 (REP5-022), which says 'b) A copy of this safety review has been submitted at Deadline 5 – please refer to Annex F – Wansford flyover lane layout safety risk assessment (TR010039/EXAM/9.25).' (The Annex document reference is now REP5-023).</p>
REP5-028 - Comments on Document 9.20 Applicant's Written Summary of Oral Submissions at Hearings		
1	<p>The applicants written summary of oral submissions at hearings raise a number of issues as set out below: Ref 3.1 Scheduled Monument</p> <p>There has been repeated reference to the significance of blank spaced in the 2017 geophysical survey. The survey technique used shows up areas where there has been excavation and infilling or burning and it also shows any metallic items that may be present. The ground in the area of the Scheduled monument is free draining, alkaline and well aerated. This means that no cloth, leather or soft tissue remains will have survived (unlike at say Flag Fen where items have been preserved in acidic saturated mud). The only thing likely to be missed by the survey is pottery and this will have been destroyed by the ploughing (note the pottery fragments scattered over other parts of the site).</p> <p>The Applicant drew a parallel between the spaces in the</p>	<p>The Applicant considers that it has addressed comments relating to the Scheduled Monument in previous submissions, including, but not limited to the Applicant's responses to ISH2, Points 3.1 – 3.3 of the Applicant's Written Summary of Oral Submissions at Hearings (REP4-018), and the Applicant's Response to Wansford Parish Council Point 3.1 within the Applicant's Response to Written Representations (REP3-026).</p> <p>Submissions have also been made into the Examination by Historic England on these matters. Please refer to REP2-074 from Historic England, which discusses the harm to the designated asset.</p>


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	<p>Scheduled Monument that showed no evidence of features with the space between Buckingham Palace and the Victoria Monument. The area of the Scheduled Monument is a field that has been extensively ploughed. We have no knowledge of any past ceremonial use and even if there was, it has left no trace of its existence. The space between Buckingham Palace and the Victoria Monument is frequently used for large ceremonial functions as well as being a busy traffic route. The comparison is completely spurious and is irrelevant to the discussion.</p> <p>The Applicant knows perfectly well that there was review of the status and boundaries of the Scheduled Monument. The Applicant has copies of the documents that were submitted to this review. These very clearly show that there was a move to change the shape of the Scheduled Monument. The outline of the proposed area was submitted to the Examining Authority by Wansford Parish Council at Deadline 4.</p>	
2	<p>Ref 3.2 Scheduled Monument - possible alternative alignment In this response the Applicant states that the test for any alignment is whether it does less than substantial harm to the Scheduled Monument. What they have never explained is why they did not apply this test to the alternative alignment when it was suggested in 2018. Instead Highways England stated at the time that it was their policy not to encroach on Scheduled Monuments regardless of the consequences. Paragraph 2 of the ISH2 response indicates the use of a different test which is also not the one set out in the legislation.</p>	<p>Please refer to the explanation at REP5-028, Point 3.1 above relating to the application of the precautionary principle. See also the response at REP5-027, Point 3.2.</p>
3	<p>Ref 9.1 Alignment of road The Applicant spoke at some length about the National Highways experience of building roads but chose to ignore that National Highways and their predecessors have been involved in several cases where instability has caused cost overruns,</p>	<p>Please refer to the Applicant's previous response to part 4 of REP2-071 within the Applicant's Response to Written Representations (REP4-015).</p> <p>The 'viable alternative' being referred to, is a route through the</p>

	Response	Applicant's Response
	<p>extended programmes and high maintenance costs. The embankments on the M11/A14 junction are just one example of this. Similarly, the Applicant spoke about Galliford Try's experience of road building. They too have had geotechnical problems notably on the approaches to the Second Forth Crossing. The simple fact is that it is not sensible to deliberately build a road embankment on a slope that is known to be unstable when there is a viable alternative.</p>	<p>Scheduled Monument. The Applicant and Historic England have made submissions into the Examination on this matter. See response to REP5-028, Point 3.2 above.</p>

4 HISTORIC ENGLAND (REP5-029) – DEADLINE 5 SUBMISSION

	Response	Applicant's Response
1	<p><i>The Planning Act 2008 - Section 89 and The Infrastructure Planning (Examination Procedure) Rules 2010 - Rule 8 and Rule 9</i></p> <p><i>Application by National Highways for an Order Granting Development Consent for A47 Wansford to Sutton Scheme</i> <i>Thank you for inviting Historic England to comment on Deadline 5 (D5) in relation to the above scheme</i></p> <p>As per Planning Act 2008 (Examination Procedure) Rules 2010 we note the applicant's response to Historic England's Witten Rep, as set out in the document 'A47 Wansford to Sutton Development Consent Order: Document 9.16 Applicant's Response to Written Representations (Rev 1 March 22)'. In particular Chapter 5 at pp35.</p> <p>We can confirm we have no further comment at this stage.</p>	<p>The Applicant acknowledges this comment.</p>

5 ROBERT W REID (REP5-032 - REP5-036) – DEADLINE 5 SUBMISSIONS

	Response	Applicant's Response
REP5-032 - Deadline 5 Submission (Part 1)		
1	<p>Dear Mr Jackson</p> <p>Find enclosed copies of emails / documents related to our proposal to relocate the station building to the south side of the bridge. We are not sure if its in your remit to pass judgment on this, but to say this is an uphill struggle is an understatement. Hence my question was for the scheme to be looked at in a holistic manner. Our proposal has not been helped by Mr D. Worley tracking the NVR option and lack of clear judgement by National Highways not wishing to discuss anything because of “process”</p> <p>I have never been involved in the PINS process before but its been engaging and interesting but cannot get my thoughts around the use of lawyers for all the replies to issues.</p> <p>The documents we enclose we tried to leave at Sacrewell Farm, so I have put them in the post to give you a better understanding of our reasons and the process to get the station moved for community use.</p> <p>With regards </p>	<p>This is a separate matter from the DCO and will be dealt with by Designated Funds as summarised in Applicant's responses to Point 3.6 to Agenda Item 3 of ISH2 within Applicant's Written Summary of Oral Submissions at Hearings (REP4-018).</p>
2	<p>Index headings; For evidence / reference file for the Relocation of Sutton Station, to the southern side of the existing A47 bridge.</p> <ol style="list-style-type: none"> 1. Proposal to Highways England 2. Basic costings 	<p>The Applicant has no further response to make. Please refer to the Applicant's response to REP5-032, Point 1 above.</p>

	Response	Applicant's Response
	<ol style="list-style-type: none"> 3. Online meeting September 2021 - PCC requested us to ask the planning department if this proposal has "merit" as they consider this a new build 4. With no reply from PCC planning, Landyke Trust become involved. 5. PPC accept paper work as a Pre-App 1-10-2021 with a promise the council would make comments by 26-11-2021 6. January 2022 still pushing PCC planning for a reply 7. January 13th a mixed reply and if no reports were with the application then these are negative. No tree report submitted as its in a grass field. 8. Engage Simon Machen MRTPI to act as our consultant and reply to all the issues of PCC planning. 9. Additional history on U tube on the line 10. NH informs us 18-2-2022 they have additional questions for Nene Valley Railway and are leaning in favour of their proposal after taking advice from independent advisors. PCC and Historic England in agreement to move the station out of the area 11. Peterborough Civic Society have a meeting and back keeping the buildings together 12. Additional information/clarification sent to NH 13 13. Additional correspondence 14. Submission Confirmation D4 <p>NH cannot discuss the relocation as it is in "process" and the selection method they claim is "robust" and this we challenge</p>	

	Response	Applicant's Response
	as key points have been omitted from their summary.	
3	<p>1. Proposal to Highways England</p> <p>Letter from Robbie Reid to Craig Stirzaker Highways England Project Manager Subject: Relocation Proposal for Sutton Station Dated: 5 August 2021</p>	The Applicant responded to this letter in an email dated 12 August 2021 which confirmed receipt of the proposals and discussed that these had been forwarded to the Designated Funds lead.
4	<p>2. Basic Costings</p> <p>Letter from Robbie Reid to Geoff Subject: Station House Costs Dated: 14 September 2021</p>	The Applicant has no further response to make. Please refer to the Applicant's response to REP5-032 , Point 1 above.
REP5-033 - Deadline 5 submission (Part 2)		
1	<p>3. Online meeting September 2021 - PCC requested us to ask the planning department if this proposal has "merit" as they consider this a new build</p> <p>Letter from Robbie Reid to Historic Built Environment Officer for PCC Regarding Sutton/ Wansford Rd Station Dated: 15 September 2021</p>	The Applicant has no further response to make. Please refer to the Applicant's response to REP5-032 , Point 1 above.
2	<p>4. With no reply from PCC planning, Landyke Trust become involved</p> <p>Email chain between Robbie Reid and Richard Astle (Langdyke Countryside Trust Chair), Mark Horne (Langdyke Countryside Trust CIO) Subject: Station master's house at Sutton Parish Dated: September 2021</p>	The Applicant has no further response to make. Please refer to the Applicant's response to REP5-032 , Point 1 above.

	Response	Applicant's Response
3	<p>5. PPC accept paper work as a Pre-App 1-10-2021 with a promise the council would make comments by 26-11-2021</p> <p>Letter from Peterborough City Council to Mr Reid, Subject: Pre-application advice validation Dated: 3 November 2021</p>	<p>The Applicant has no further response to make. Please refer to the Applicant's response to REP5-032, Point 1 above.</p>
4	<p>Email chain between Robbie Reid and Peterborough City Council, and Richard Astle (Langdyke Countryside Trust Chair) Subject: Application for Pre-Application Advice – Land South of A47 Wansford Peterborough (ref PAoTH/21/00033) Dated: November 2021</p>	<p>The Applicant has no further response to make. Please refer to the Applicant's response to REP5-032, Point 1 above.</p>
5	<p>Email chain between Robbie Reid and Peterborough City Council Subject: Sutton Station information to PCC planning Dated: October 2021</p>	<p>The Applicant has no further response to make. Please refer to the Applicant's response to REP5-032, Point 1 above.</p>
6	<p>6. January 2022 still pushing PCC planning for a reply</p> <p>Email chain between Robbie Reid and Richard Astley (Langdyke Countryside Trust Chair) Subject: Sutton station house relocation Dated: January 2022</p>	<p>The Applicant has no further response to make. Please refer to the Applicant's response to REP5-032, Point 1 above.</p>

	Response	Applicant's Response
7	<p>Letter from Peterborough City Council to Robert Reid Subject: Planning Pre-application enquiry, Proposal: Reconstruction of station Dated: 13 January 2022</p>	<p>The Applicant has no further response to make. Please refer to the Applicant's response to REP5-032, Point 1 above.</p>
REP5-034 - Deadline 5 submission (Part 3)		
1	<p>7. January 13th a mixed reply and if no reports were with the application then these are negative. No tree report submitted as its in a grass field</p> <p>Letter from Senior Development Management Officer Jack Grady at Peterborough City Council Subject: Pre-application enquiry? Not dated.</p>	<p>The Applicant has no further response to make. Please refer to the Applicant's response to REP5-032, Point 1 above.</p>
2	<p>8. Engage Simon Machen MRTPI to act as our consultant and reply to all the issues of PCC planning</p> <p>Letter from Simon Machen (Barmach Ltd Planning) to Robbie Reid Subject: Sutton Station Relocation Dated: 17 February 2022</p>	<p>The Applicant has no further response to make. Please refer to the Applicant's response to REP5-032, Point 1 above.</p>
3	<p>Email chain between Robbie Reid and Tarvinder Gohel (Technical Director / Bridges Team Leader Arcadis Consulting UK Ltd) Subject: Station house Dated: February 2022</p>	<p>The Applicant has no further response to make. Please refer to the Applicant's response to REP5-032, Point 1 above.</p>

	Response	Applicant's Response
4	<p>9. Additional history on U tube on the line</p> <p>Email chain between Robbie Reid and Mick Grange (Sutton Parish Council Subject: Info on old rail line Dated: February 2022</p>	<p>The Applicant has no further response to make. Please refer to the Applicant's response to REP5-032, Point 1 above.</p>
5	<p>10. NH informs us 18-2-2022 they have additional questions for Nene Valley Railway and are leaning in favour of their proposal after taking advice from independent advisors. PCC and Historic England in agreement to move the station out of the area</p> <p>Email chain between Robbie Reid and Tarvinder Gohel (Technical Director / Bridges Team Leader Arcadis Consulting UK Ltd) Subject: National Highways – A47 Sutton Station House Building Dated: February 2022</p>	<p>The Applicant has no further response to make. Please refer to the Applicant's response to REP5-032, Point 1 above.</p>
<p>REP5-035 - Deadline 5 submission (Part 4)</p>		
1	<p>11. Peterborough Civic Society have a meeting and back keeping the buildings together</p> <p>Email chain between Richard Astle (Langdyke Countryside Trust Chair), David Turnock (Chairman Peterborough Civic Society), and Tarvinder Gohel (Technical Director / Bridges Team Leader Arcadis Consulting UK Ltd) Subject: National Highways – A47 Sutton Station House Building Dated: March 2022</p>	<p>The Applicant has no further response to make. Please refer to the Applicant's response to REP5-032, Point 1 above.</p>

	Response	Applicant's Response
2	<p>12. Additional information/clarification sent to NH 13</p> <p>Email chain between Tarvinder Gohel (Technical Director / Bridges Team Leader Arcadis Consulting UK Ltd) and Robbie Reid Subject: Sutton/ Wansford Rd Station relocation Dated: February 2022</p>	<p>The Applicant has no further response to make. Please refer to the Applicant's response to REP5-032, Point 1 above.</p>
3	<p>13. Additional correspondence</p> <p>Email chain between Richard Clarke (Parish Councillor – Wansford Parish Council), Daniel Worley, and Richard Astle (Langdyke Countryside Trust Chair), and Tarvinder Gohel (Technical Director / Bridges Team Leader Arcadis Consulting UK Ltd) Subject: National Highways- A47 Sutton Station House Building Dated: March 2022</p>	<p>The Applicant has no response to make. Please refer to the Applicant's response to REP5-032, Point 1 above.</p>
REP5-036 - Deadline 5 submission (Part 5)		
1	<p>14. Submission Confirmation D4</p> <p>Submission Confirmation to PINS via email John Clare Countryside a heritage landscape with nature at its heart Dated:23 March 2022</p>	<p>The Applicant has no further response to make. Please refer to the Applicant's response to REP5-032, Point 1 above.</p>