

A47 Wansford to Sutton Dualling

Scheme Number: TR010039

Volume 9 **9.31 Applicant's Comments Deadline 7** **Submissions**

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

Planning Act 2008

June 2022

Deadline 8

Infrastructure Planning

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

A47 Wansford to Sutton
Development Consent Order 202[x]

**9.31 APPLICANT'S COMMENTS ON DEADLINE 7
SUBMISSIONS**

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Author:	A47 Wansford to Sutton Project Team, National Highways

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CONTENTS

1	INTRODUCTION.....	1
2	WANSFORD PARISH COUNCIL (REP7-019).....	2

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 7 submissions.

2 WANSFORD PARISH COUNCIL (REP7-019)

	Response	Applicant's Response
1	Section 3 Wansford Parish Council (REP5-027 and REP5-028) Points 1-4	
2	In their response to Wansford Parish Councils comments, the Applicant refers to the criteria used to decide that it was not possible for the route of the A47 to go through the gap in the Scheduled Monument.	
3	The criteria to be applied when deciding whether a development can impinge on a Scheduled Monument are set out in the Historic England document REP2-074. When the findings of the route selection meeting were published, Wansford Parish Council asked for the exact reasons why the commonly supported northern route had been discarded. The response from the Highways England project manager at the time was "It is Highways England's policy not to challenge Historic England as we always lose such challenges". This was said in front of numerous witnesses and shows that Highways England did not apply the correct criteria in deciding not to impinge on the Scheduled Monument.	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 response 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).
4	Clearly there is a public interest case for the road to be routed away from the Nene Valley for all the reasons that have been set out previously by Wansford Parish Council (including large savings of costs, construction programme and risk) and yet this test appears not to have been applied.	

	Response	Applicant's Response
5	<p>The Applicants Responses make frequent reference to the Historic England document REP2-074. This document makes no reference to an option for the route to go through the Scheduled Monument avoiding all the identified features and it is clear that such an option was never raised seriously with Historic England. Face to face discussions with Historic England at a meeting requested by Wansford and Sutton Parish Councils, which Highways England declined to attend, produced the comment from Historic England that they had never analysed the layout of the individual features of the Scheduled Monument. Had Highways England raised the "through the middle" option, Historic England would no doubt have looked at the relationship between the various identified features.</p>	<p>The Applicant has consulted with Wansford Parish Council and Sutton Parish Councils and Historic England, both informally and formally throughout the development of the Scheme. Details of consultation are set out in the Consultation Report (APP-023) and its Annexes (APP-024 – APP-038).</p> <p>The Applicant's response to ISH2 Point 3.3 of the Applicant's Written Summary of Oral Submissions at Hearings (REP4-018) states that the Applicant agreed with Historic England that, as the road exists already, increasing the development along the existing road is preferred as it will cause less impact than a new development through the designated site. Historic England repeated that there would be a small degree of harm but this would be less substantial and also echoed the Applicant's previous point about negative space. The Applicant chose to add that the design philosophy undertaken under best practice guidance and the Scheduled Monument Act is to take the minimum amount of land possible. The approach to encroaching on the Scheduled Monument is to take the minimum possible and that has been taken into account here during the process of making the alignment choice for the Scheme.</p>