



WANSFORD PARISH COUNCIL

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Parish Clerk: Mrs M Lewis

4th December 2022

The Rt Hon Mark Harper MP
Secretary of State for Transport
The Department for Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR

Dear Minister

Application by National Highways for an Order granting Development Consent for the A47 Wansford to Sutton Project

Further to our letter of the 28th September 2022, the Planning Inspectorate has recently published the National Highways response to the Department for Transport's letter of the 28th October 2022. We would have written to you earlier but the National Highways letter and supporting documentation was only published on the 2nd December 2022, despite being dated the 11th November 2022.

The final paragraph of the National Highways letter includes the following statement :-

The findings of the Supplementary GI (2022) did however include recording the presence of possible shear surfaces within the Whitby Mudstone (Lias Group). This was highlighted as a risk at the preliminary design stage of the Scheme, as detailed within the Ground Investigation Report (GIR) submitted during the Examination (REP1-009). The impact of encountering these features will likely result in the design and construction of appropriate mitigation measures which may include reducing the gradient of proposed earthworks in affected areas, and installation of hard engineering solutions along the toe of proposed earthworks to intersect the shear surfaces to ensure stability of the proposed earthworks.

Wansford Parish Council warned National Highways about this problem at the very start of the project in 2017 but National Highways chose not to make use of this local knowledge during their route selection process. The evidence was clear as the Anglia Water pumping station and the filling station, both on the same strata locally, have a history of land slips. In the area of the recent boreholes, the power poles can be seen leaning over demonstrating that there has been recent ground movement.

The National Highways response states that they will address these soil properties by making the embankment slopes shallower and installing hard engineering solutions (piling) at the toe of the slope. Making the slopes shallower will mean that the construction will encroach further on the County Wildlife Site, including the wildlife corridor along the river. Piling the toe of the embankment will be noisy and expensive. Based on Highways England's own estimates, the route selected is already between 6 and 11 million pounds more than the alternative further north.

The issues surrounding slopes in fissured clay (the description used in the geotechnical investigation rather than Whitby Mudstone as used in the National Highways letter) have been well described by Prof R J Chandler who investigated the movement of the Anglia Water pumping station. The problem is that the properties of such soils are very difficult to quantify making slope stability calculations unreliable. At this site, the clay goes very deep so it is not practical to replace it or pin it with piling. Even if a slope is initially stable, it may fail later as the result of drying or wetting of the silt layers which interleave the clay. This problem is responsible for the majority of failures of embankments in the UK. Good engineering practice is to avoid building on this type of slope.

The reason that this route has been selected is to avoid the area of a Scheduled Monument on the north side of the existing A47. While the Scheduled Monument contains many items of interest, non-intrusive investigations have shown that it is composed of a series of features with large spaces between them. As described in the Parish Council document "Alternative Visions", attached to our earlier letter of the 28th September 2022, there is a route for the road through the Scheduled Monument that does no substantial damage to the monument. The route that the road would follow is across an area that has been deep ploughed for many years and which has also been disturbed by the installation of field drains. No features show on the non-intrusive survey in this area and repeated surface walks over the years have not recorded any pottery fragments (these are plentiful on other parts of the site). Historic England has stated that they relied on the mapping in "Alternative Visions" instead of doing a full analysis of the site themselves. They therefore have no basis to challenge these findings.

In summary, National Highways have chosen a route that will be :-

1. Expensive to build
2. Always prone to ground movements whatever measures are put in place during construction
3. Unable to accommodate future widening of the road
4. Makes poor provision for walkers, cyclists and horse riders

This has come about because National Highways is unwilling to challenge Historic England and have a public dialogue about the merits of a route through the Scheduled Monument.

While supporting the need for this road upgrade, Wansford Parish Council would ask the Secretary of State to instruct National Highways to look again at the route of the section of road where it goes close to the river Nene.

Yours sincerely

Cllr John Stannage
Chairman of Wansford Parish Council

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