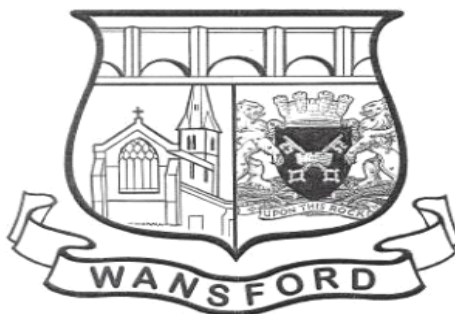


**Wansford Parish Council**



10 January 2023

Ms Dominey  
Transport Infrastructure Planning Unit  
Department for Transport  
Great Minister House  
33 Horseferry Road  
London  
SW1P 4DR

By Email to [transportinfrastructure@dft.gov.uk](mailto:transportinfrastructure@dft.gov.uk)  
cc: [A47WansfordtoSutton@planninginspectorate.gov.uk](mailto:A47WansfordtoSutton@planninginspectorate.gov.uk)

Dear Ms Dominey,

**APPLICATION BY NATIONAL HIGHWAYS FOR AN ORDER GRANTING  
DEVELOPMENT CONSENT FOR THE A47 WANSFORD TO SUTTON SCHEME  
(TR010039)  
CONSULTATION SEEKING COMMENTS FROM ALL INTERESTED PARTIES**

Having viewed the National Highways Response to our letter of the 4<sup>th</sup> of December 2022, Wansford Parish Council would like to respond briefly to some of the points made.

We accept that some of the issues raised were discussed during the Planning Inspectorate hearings but, having not seen the Examiner's report, we do not know what weight was put to them.

On the matter of cost, the Examiner made it very clear that the cost of the project was not part of his examination, leaving us to raise this matter directly with yourselves.

In direct response to the Applicant's letter, we would like to make the following points.

Point 1 – Ground Conditions

The Applicant may have been aware of the risk of instability but that does not explain why they chose the route which has maximum exposure to these risks.

#### Point 2 – Design Approach

We note that the Applicant has not responded to the increased costs of building on the chosen alignment compared with the alternative.

#### Point 3 – Design Approach

The Applicant will without doubt design the embankment using residual effective shear strength parameters but these parameters cannot be determined with any accuracy. This leaves an element of uncertainty in the design. Why spend a lot of money building on an unstable slope when you do not have to?

#### Point 4 – The Route Through the Scheduled Monument

The Applicant and Historic England may have referred to the alternative route in three documents each but none of these statements gives a reason why the alternative is not viable. No one has explained how the alternative can be described as doing substantial damage to the Scheduled Monument, which we understand is the appropriate test to apply. This is exactly the same attempt to dodge the issue as the Applicant refusing to discuss the alternatives in a three-way meeting with the local community and Historic England.

The statement that “There is no merit to Wansford Parish Council’s (WPC) suggestion” simply emphasises the blinkered attitude that the Applicant has shown to the alternative route throughout this process and their disdain for the local community’s views.

#### Point 5 – Expensive to Build, Prone to Instability, No Future Proofing, Poor Non-Motorized User Provision

Document AS-022 may set out the economic case for the project but the economic return would be better with reduced costs and massively reduced disruption during construction. It is difficult to understand why National Highways do not seek to reduce the cost of the project, particularly when the alternative route gives considerable “wider benefits” including reduced geotechnical risks.

The statement that “there are no requirements for the design to accommodate future widening” appears to show that National Highways has no interest in planning for the future. The nearby A14 (originally the A604) is now on its third incarnation in 45 years. The same thing could happen to the A47.

The provision for pedestrians, cyclists and equestrians on this section of the new road is shown as a “new shared cycle track” approximately 2.5m wide with a narrow verge separating it from the carriageway. There is no provision for equestrian use. With the alternative alignment, the full extent of the existing road would be available for non-motorized use.

#### Point 6 – Public Dialogue about the Alternative Route

The Applicant has not addressed this issue under Point 4 and indeed has never addressed the issue, hence Wansford Parish Council's request to the Secretary of State.

We would be pleased to expand on any of these points if it would be helpful.

Yours Sincerely

A black rectangular box used to redact the signature of Marie Lewis.

Marie Lewis  
Clerk & Responsible Financial Officer, Wansford Parish Council  
Sent on behalf of Wansford Parish Council