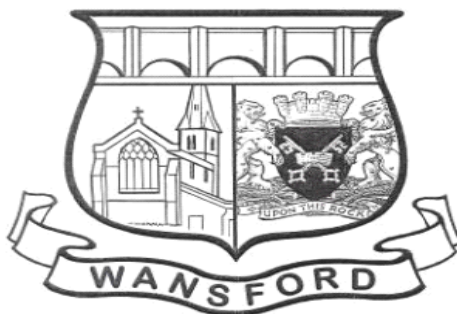


Wansford Parish Council
Community Hall, Peterborough Road, Wansford, Cambs, PE8 6JN



24 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
cc: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 IN
RESPONSE TO THE 10th JANUARY 2023 CORRESPONDENCE**

Having read with care the responses by the Applicant in their letter dated the 17th January 2023, Wansford Parish Council would like to comment on several points.

Ground Investigation Report

Point 5

It is clear that the presence of potentially unstable fissured clay will add to the cost of the project either as a result of hard engineering features or as increased cut and fill volumes. This was a predictable cost, particularly as the Applicant has stated that the issue was raised in the site selection process in 2017. The Applicant may have contingencies in their budget but it is surprising that they expect to use the contingencies to address an issue that they have known about for more than 5 years.

Very simply, the Applicants choice of road alignment will increase the cost of the project compared with other options. Whether the money to address the stability of the road comes from the core budget or contingencies, it is still government money being spent as a result of a wrong decision by National Highways.

Point 6

Whether or not the Applicant uses large quantities of concrete in the construction of the section of road between the Wansford East Roundabout and the Wittering Brook, this section will still have a significant Green House Gas impact because of the much increased earth moving and compaction effort needed compared with the alternative.

Carbon Emissions

Point 7

As noted above, whatever construction solution is used, the plant emissions will be higher for a solution going close to the river than for a route further north. The volumes of earth moving would be considerably less on a northern route and there will be no requirement to import fill material as may well be needed close to the river.

One item missing from the carbon emissions assessment is consideration of the carbon sequestration in the areas being disturbed. So far as can be ascertained, the area between the existing A47 and the river is meadow that has never been ploughed. This land will have acted as a sink and will have considerable retained carbon. This will be released if it is disturbed. By contrast the land north of the A47 was ploughed regularly up until 2006 and will have much less retained carbon. The use of a more northerly route instead of going close to the river will release less carbon into the atmosphere even before vehicle emissions are considered.

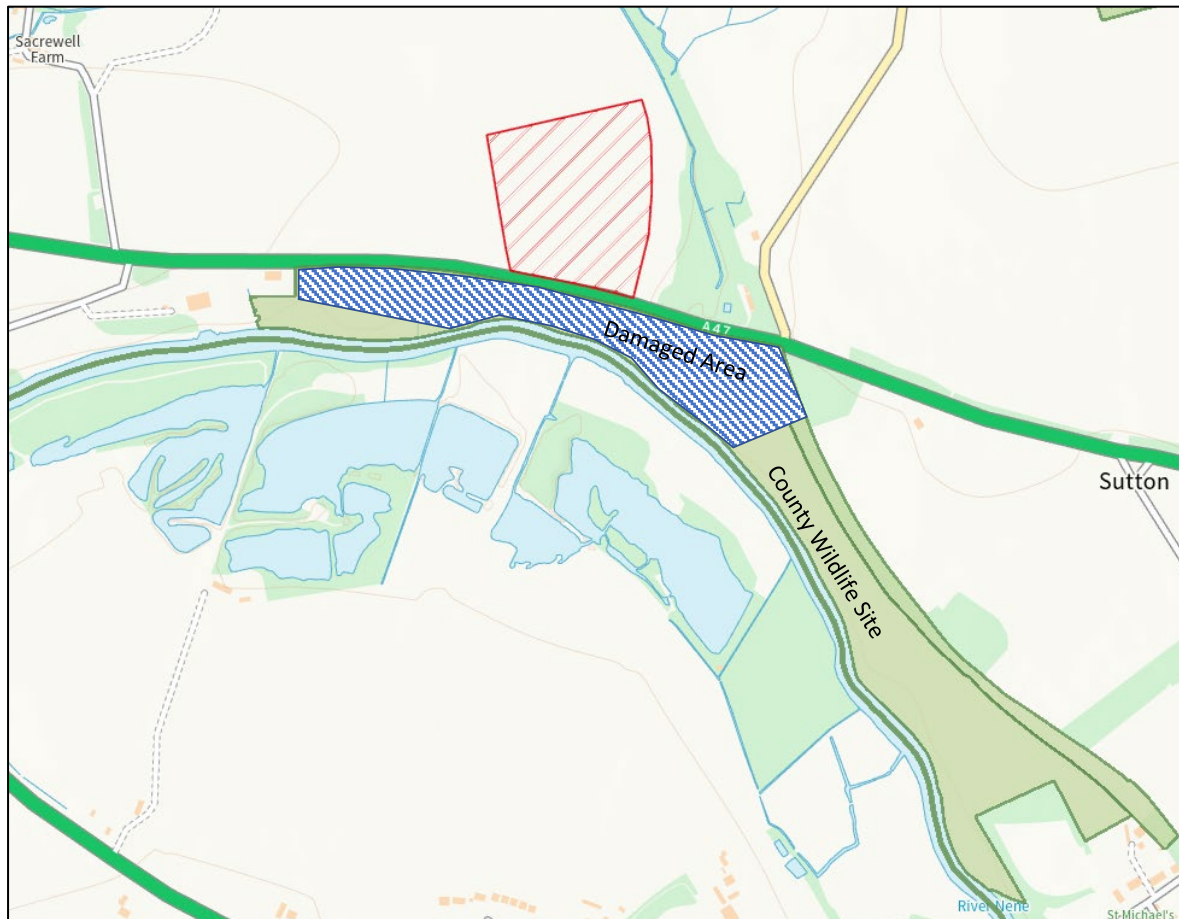
Damage to the Environment of the Nene Valley

Throughout their responses, the Applicant has treated the option to flatten the embankment slopes towards the river as being a penalty free solution. The reality is that any work in this area is damaging a County Wildlife Site and impinging on the Nene Valley Landscape Character Area.

In recent discussions between the Contractor for the project and a local landowner it has become apparent that the drainage pond and flood compensation works east of the Wittering Brook have more than doubled in size.

The Contractor has also said that he intends to divert the electricity cables, that are at present on poles more than 50m from the river, so that they are clear of the embankment works and to the south of the drainage pond. This will mean that the cables will be close to the river over a 600m length if they are to be clear of the construction working area. Putting the power lines on that alignment will also require the removal of most of the trees in the area to avoid damage to the cables. During the hearings, the Examiner made the point that moving these power cables underground would be a considerable environmental gain for the project but it appears that the project will now move them to a position where they will do maximum environmental damage.

These changes after the Examination means that the project will now destroy nearly half of the County Wildlife Site. The Site is shown below in green on the extract from the PCC Community Map with the damaged area shaded in blue.



We now understand why the Applicant was so keen at the Examination stage that the final DCO excluded consultations at detailed design stage with the local community represented by the two Parish Councils. The County Wildlife Site and the tranquility of the Nene Way footpath are valued by the local community but both will be permanently damaged by the project in its present form.

We acknowledge that a Scheduled monument may have a higher ranking than a County Wildlife Site or the Nene Valley Landscape Character Assessment area but, when the options are a minor impact on an invisible monument or the destruction of a well loved local amenity, it is clear which the community would choose. Add to this the increased project costs and all the other problems associated with the National Highways route and it is clear that a mistake has been made.

If there is any doubt about the landscape value of the Nene Valley, the Department may like to look at <https://www.wildlifebcn.org/living-landscapes/nene-valley> by the Wildlife Trust for Beds, Cambs and Northants and refer to the Nene Valley Nature Improvement Area project sponsored by Natural England.

Wansford Parish council has no comments on the correspondence from Natural England and the Secretary of State for Levelling Up, Housing and Communities.

Yours Sincerely



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