



Department
for Transport

Great Minster House
33 Horseferry Road
London, SW1P 4DR

E-mail: transportinfrastructure@dft.gov.uk
Web: www.gov.uk/dft

To:

The Applicant, Natural England

27 January 2023

Dear Sir/Madam,

Planning Act 2008 and the Infrastructure Planning (Examination Procedure) Rules 2010

Application by National Highways Limited (“the Applicant”) Seeking Development Consent for the Proposed A47 Wansford to Sutton Dualling scheme

Carbon Emissions

The Secretary of State notes what appears to be an error at paragraph 14.8.9 of [Chapter 14 of the Environmental Statement](#) which states that the Proposed Development would produce less than 0.001% (0.0078%) of the UK’s Fourth, Fifth and Sixth carbon budgets. However, he is mindful that these figures have since been superseded in light of the additional information regarding construction emissions provided by the Applicant in its response dated [17 January 2023](#).

1. The Secretary of State notes the response from Wansford Parish Council dated 24 January 2023 and from Dr Boswell on behalf of Climate Emergency Planning and Policy dated 22 January 2023. The Secretary of State invites the Applicant to confirm whether any update is required to its responses of 17 and 26 January 2023 or whether the response of 17 January 2023 represents the worst-case scenario in relation to carbon emissions.
2. The Secretary of State has considered the Applicant’s updated carbon emission figures in table 14-10 in its response mentioned above. The Secretary of State requests that the Applicant sets out the impact of these figures on the carbon budgets expressed as a percentage of the total emissions against each relevant carbon budget period.

Drainage

3. The Secretary of State notes the points raised in relation to drainage layout by Mr Robbie Reid in his representation dated 6 January 2023 and Wansford Parish Council in their representation dated 24 January 2023. The Secretary of State invites the Applicant to comment on the points raised.

Protected Species

4. The Secretary of State draws the attention of Natural England to the Applicant's response of 26 January 2023, and notes that Natural England has confirmed that it will respond on its assessment of the draft bat European Protected Species Licence application by the deadline of 2 February 2022.

Deadline for Response

The deadline for response is **3 February 2023**.

Responses to the matters outlined in this letter should be submitted by email to A47WansfordtoSutton@planninginspectorate.gov.uk .

If you will have difficulty in submitting a response by the consultation deadline, or difficulty in submitting a response by email, please inform the Planning Inspectorate Case Team.

The responses will be published on the project page for the A47 Wansford to Sutton Project on the Planning Inspectorate website as soon as possible after the **3 February 2023** deadline at:

[A47 Wansford to Sutton | National Infrastructure Planning \(planninginspectorate.gov.uk\)](#)

This letter is without prejudice to the Secretary of State's decision on the A47 Wansford to Sutton application and nothing in this letter is to be taken to imply what that decision might be.

Yours faithfully,

Rachel Dominey
Transport Infrastructure Planning Unit

Annex A – Representations from Mr Reid

From: robbie reid [REDACTED] >
Sent: Saturday, November 12, 2022 11:17:48 AM
To: Transport Secretary <transportsecretary@dft.gov.uk>
Subject: A47 WANSFORD TO SUTTON

Dear Rt Hon Mark Harper MP

Would like you to fully understand some of the flaws in this road scheme put forward by National Highways, and also for you to consider the role Heritage England have in pushing the design so close to the edges of the River Nene and its floodplain. This area is subject to geotechnical issues due to limestone top layer with impervious blue clay below highlighted by the recent remedial work recently completed on the Anglia Water pumping station. For years Historic England have stuck to an assessment that they have a burial barrow in nearby field, National Highways has not challenged this and hence have designed the road around this field, this pushes the building of this scheme and NUMs route on top of this "risky" ground and results in the partial infill of flood plain. Also causes the removal of a healthy 250-year-old oak tree known as T20 in the design. At the Planning Inspectorate stage Historic England now claim its now 98% the remains of a round house and the dot is a firepit. This admission came too late to the final design of the road, these are very common archaeological features around this area, but still means this road during and post construction is going to be liable to extreme costs due to what locally is known as the "Wansford Slip". The area is also a County Wildlife Site, creating environmental damage. Have enclosed a picture of the area to be infilled and built on taken when the Nene was covering the flood plain.

Second point I wish you to consider is the waste of tax payers funding money held by Designated Funding and administered by National Highways. Sutton Station was a private home and is in the route of the proposed road. Small rural station built by Lord Burghley in 1874, and a branch line closed even before Dr Beeching in 1937 due to economics. Situated on the north side of the angled Victorian bridge used by the present A47 will become part of NUMs route after the new road is built. All the local parishes and lead by myself wished to rebuild it on donated land just southside of the bridge for local use, connected to the new NUM route with a care taker family. Nene Valley railway a charity wishes to spend a fortune of taxpayer's money by taking this to the near centre of Peterborough to "uplift" Railworld. They have already been awarded 250k for the removal of the building and I understand were hoping to receive another 250k via levelling up funds for the Station Quarter and Peterborough CC. We had private and local community quarry funds and did apply for 150k for total of removal and reconstruction. Locally the community is very disappointed on the actions of National Highways, and more so that the Levelling up fund they were hoping to tap into has been ruled out and both charities do

not have the money to rebuild, so are now going to put it into storage probably never to be seen again. Heritage within a community if at possible should stay within the community. Could you please question this issue, the planning inspectorate tried but his remit is only the DCO area, and Designated Funding is outside the DCO.

I am happy to answer any questions you may have, either via mobile [REDACTED] or my email [REDACTED]

Hoping you will consider these 2 points before signing off this scheme or at least consider the way the scheme will be considered in years to come with its Geotechnical Risks, even if it's delayed a year or so to really sort these issues.

Yours sincerely

Robert W Reid

This email has originated from external sources and has been scanned by DfT's email scanning service.

[REDACTED]

[REDACTED]

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12th December 2022

Dear Minister

I am enclosing a report regarding the A47 Dualling between Wansford and Sutton, and as a stakeholder I can no longer support or agree with National Highways on the final design for the following reasons

1. Building the road on unstable ground and infilling of floodplain on a Country Wildlife Site.
2. The re-engineering of a new floodplain also on a County Wildlife Site, destruction of quality limestone meadow and its associated flora and wildlife.
3. Closure of a wildlife corridor between Sutton Meadows and Sutton Heath.
4. Inability of National Highways to challenge the lies and assumptions made by Historic England, they eventually admitted to the Planning Inspector that it is unlikely a burial barrow and is now the carbon stains of a ring ditch round house. They are numerous in this area.
5. Removal of Sutton Station by Nene Valley Railway with the help of dodgy planners in Peterborough City Council. (they applied to levelling up funds to rebuild in Peterborough but missed out) But do receive 200k from Designated Funding to remove it!!! Apparently they don't have the funds to rebuild, maybe by 2030.

Please minister we ask you to ask the questions before giving this project the green light. This road should be off line running on the north side of the existing A47, where Atkins in 2017 originally proposed. Tell National Highways to review this mid-section, before doing unmitigated damage and potentially costing a fortune both during and post road scheme.

With Regards

[REDACTED]

R. W. Reid





A47 Wansford to Sutton

Wansford Road Station, Sutton

15th November 2022

A47 Wansford to Sutton

Wansford Road Station, Sutton

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1 Introduction

1.1 Purpose of this Document

This document describes the process by which Highways England has decided to manage the relocation of Wansford Road Station, a building which forms part of a group of structures which are on the Peterborough City Council list of Buildings of Local Historic Interest. A group of local residents have put forward a plan to reconstruct the station for community use adjacent to its present location but this has been opposed by National Highways and the Peterborough City Council planning department. Instead they have supported the idea of shipping the stonework to the Nene Valley Railway who may, or may not, use it in central Peterborough where it will be completely out of context. The listing stresses the importance of Heath House, the station and the A47 road bridge as a group but Highways England and the Peterborough City planners appear to have ignored this.

1.2 Why This Document is Needed

This document has been produced to record the process that has been followed by National Highways so that it can be examined for fairness, openness and accountability. It has become clear during the process that there is a bias by certain individuals in National Highways against Robbie Reid who has been the community lead for the station relocation and this should be examined in some detail.

1.3 The History of the A47 Wansford to Sutton Dualling Project

The National Highways project to upgrade the A47 Wansford to Sutton stretch started in 2017 and both communities and Parish Councils have taken a keen interest in its development. This interest has been exactly in line with government policy that local communities should have a close involvement in developments that affect them.

In March and April 2017 National Highways (then Highways England) carried out a consultation on 3 possible routes for the new road. 62% of those consulted preferred the northern route but in a meeting in August 2017 National Highways decided to select the southern route. The minutes of this meeting were not published for a year but when they were it was obvious that those taking part were not really qualified to make such decisions and that they took no notice of the local community.

The southern route that was selected went through two County Wildlife sites, trashed an area of ancient woodland, impinged on the river Nene flood plain and put the road into an area of known geotechnical instability. The only reason that was given for this route selection was that it avoided a Scheduled monument although those making the decision made no attempt to analyse the features or significance of the designated area.

Following this decision, the local community published a document entitled Alternative Visions which described in detail how the northern route could be used without doing material damage to the Scheduled Monument. It also pointed out the significant risks for the future stability of the road, £11 million extra cost of the southern alignment and the fact that this alignment made impossible to widen the road in the future. The document pointed out that the suggested alignment of the road required the relocation of Wansford Road Station and it offered a site near Ufford Halt where the building would be fully in context. When this document was given to the National Highways project manager, he put it to one side, stating that he would probably not look at it.

Later investigations by the community found that the National Highways decision had been influenced by the presence of land to the north which was owned by Homes England (see SSPLOG report drafted

A47 Wansford to Sutton – Wansford Road Station, Sutton

in April 2015 by Enzygo consultants). Comments by the project manager also revealed that National Highways regarded anyone who expressed a view contrary to theirs as an enemy of the project. Even though the local communities had clearly stated that they were in favour of the project on the grounds of improved resilience and safety, National Highways made no attempt to take benefit from the local knowledge and skills of the community.

In 2020, following pressure from the local landowners, National Highways changed the layout of the scheme so that it crossed the old railway line north of the existing bridge and then continued to the north of the existing road. This layout was a significant improvement but it still left the road south of the Scheduled Monument, impinging on the County Wildlife Site along the river Nene and resulting in the destruction of an ancient oak tree. The road is still in an area of instability and it cannot be widened.

Finally in 2021, under pressure from landowners, the road alignment was amended again so that it crossed a small area at the extreme south-eastern corner of the Scheduled Monument, an area which had no reason to be included in the Scheduled area anyway. This change was made to reduce the amount of agricultural land taken by flood alleviation measures associated with the A47 development.

1.4 The Scheduled Monument

The Scheduled Monument immediately to the north of the existing A47 has played a significant role in the selection of the route of the upgraded A47 and yet there has never been a proper debate about its significance and composition. The local community has repeatedly asked for a joint meeting with National Highways and Historic England but this has always been blocked by National Highways. Their stance on it was a statement by the project manager just after the initial route selection when he said that it was not National Highway's policy to challenge Historic England. As a result of blind adherence to this approach, National Highways is proposing to build a sub-optimal road development at considerably greater cost than the optimum solution.

Historic England treats the scheduled monument as a single indivisible block with no regard to what is actually in it. They have never done any investigation of the site although National Highways did a geophysical survey at the start of the project. The results of this survey are shown in Figure 1 and it is clear that the area is actually a series of features around a core area of interest.

Since the survey was done, Historic England have revised the area of the Scheduled Monument, extending it to the north to include an area that is clearly of interest and removing a band of land along the eastern boundary. The latter change was said to be a concession to the project but in reality it is clearly a drafting error as it removes several interesting features shown in the north eastern corner of the survey.

Historic England's lax attitude to the whole designation process was demonstrated in a meeting between Historic England and the two local Parish Councils (National Highways were invited to attend but declined). In this meeting the regional manager of Historic England stated that the organization had done no spatial analysis of the Scheduled Monument and instead they had relied on the work done by Wansford Parish Council and published in Alternative Visions.

It is also notable that Historic England have changed their description of the critical southern feature in the Scheduled Monument several times. It has been various a ring ditch, a burial site and a roundhouse with a fire pit in the middle. They have now said that they are 97% confident that the last description is correct even though for most of the project development they have insisted it was a burial site. The

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remains of roundhouses are very common in this area and they are not normally regarded as of great significance.

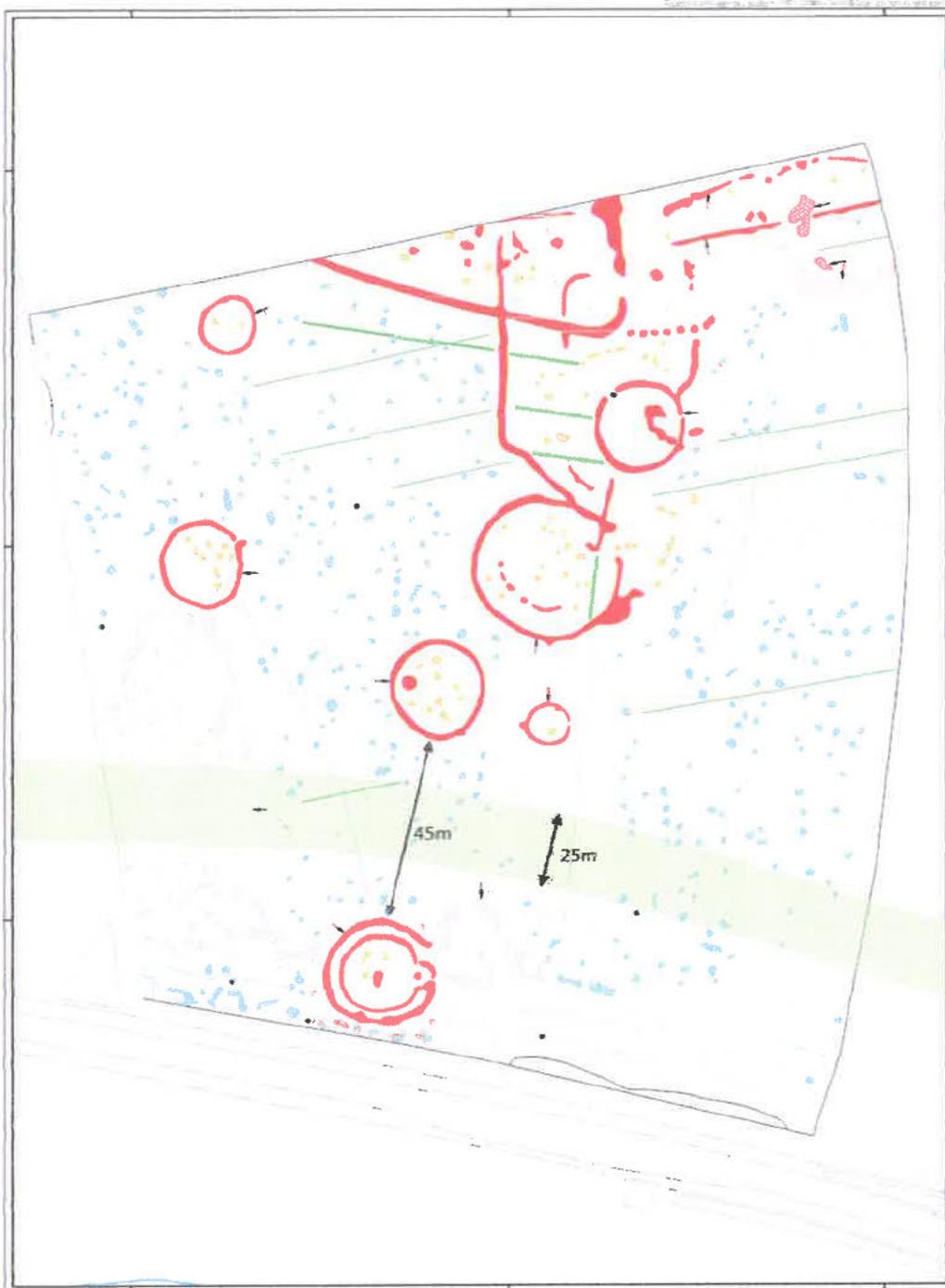


Figure 1 – Survey of the Scheduled Monument showing a possible road alignment

2 The Relocation of Wansford Road Station

A47 Wansford to Sutton – Wansford Road Station, Sutton

With the chosen road alignment for the upgraded A47, the route passes right over Wansford Road Station, requiring it to be removed or relocated.

2.1 The History of Wansford Road Station

Wansford Road Station, Sutton was part of a branch line built by Lord Burghley to connect Stamford to the Northampton/Peterborough line. The line opened in 1867, but was not a success and closed in 1929, although part of it was used during the Second World War. This was a long time before the cuts initiated by Dr Beeching in 1963. The station then became a private residence and hence it is in remarkably good condition for its age, retaining most of its original features on the outside along with the wood and glass platform canopy. Some of the stonework has stone mason markings that we believe worked at Burghley House. The station was occupied as a private residence until 2019 and the utilities are still connected.

Peterborough City Council (PCC) planning department had entered the station into the Local Heritage Protection Register that the three structures that make up a near-intact rural railway station be kept together (Heath House the old Station Masters House, Victorian Angled Bridge, the Wansford Road Station and platform).

2.2 The Decision Process Relating to the Relocation of the Station

The original Wansford Parish Council proposal to relocate the station building to Ufford Halt, where it would have been on the branch line adjacent to a very similar rail bridge was not pursued and the first the community heard was that the building was going to the Nene Valley Railway (NVR) estate as scrap.

The local community, led by Robert Reid, put forward a proposal to rebuild the station adjacent to its present location but on the south side of the rail bridge, thus keeping the three elements in the local listing together. The relocated building would be used as a community centre and a stopping point for walkers using the Nene Way. The building would include accommodation for a warden who would manage the use of the centre. ~~Having someone resident in the premises would also act as a deterrent to anti-social behaviour in the area of the existing rail bridge and the much more extensive structure where the rail bed passes under the new A47.~~

This application was now to be considered by Designated Funding (DF) headed by Gohel Tarvinder, Arcadis Consulting. Online meetings were conducted with the National Highways independent consultees, Daniel Worley from PCC who made it quite clear he was backing the NVR option, so not very independent, aided by Dr Will Fletcher of Historic England who now backs Daniel on moving the station to NVR, another agency officer who has been challenged by their failure to tell the truth over a burial barrow / round house. Consultations regarding the station house were limited as the project team would only discuss DCO matters, and DF is outside the DCO. This was very convenient when it came to the Planning Inspectorate stage of the process because his remit was only the DCO.

~~If the decision process regarding the relocation of the station had been fair, just and above board then the community would have accepted the relocation to NVR/Railworld, but this simply is not the case. Only at the conclusion of "your process" is it possible to assess these issues, because the applicant has to follow the process that is offered up by NH, and DF. In mid-February we received an email and a report from Arcadis listing the reasons why our Sutton application was not successful. This was a set of comment boxes, from the meeting on 22nd January 2022. This date is important as it was the same day PCC planning emailed the reply to our pre app we put to them in September 2021. We were given no time to reply or address the issues in this application. For example, PCC planning was not in favour of the Community plan because the station would require a car park. In our pre app we never put in for or wanted a car park. This was a fabrication by the planning officers. Other reasons for rejection included:~~

- ~~1. Lack of connection detail to the WCHER route.~~
- ~~2. The development classed as a new build in the countryside.~~
- ~~3. Lack of proof of previous planning permissions and habitation.~~
- ~~4. Lack of a tree report.~~

~~This was all based on a pre application consultation not a full planning application.~~

~~Wansford Road Station would be relocated right next to the planned WCHER route using the old track bed.~~

~~The building has been in place since 1867 so by any imagination it is not a new build, it is simply being relocated a short distance to keep it in context with the bridge and rail cutting.~~

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The building predates the existing planning system and it was well known that it was inhabited from 1946 to 2019.

A tree report would have been produced as part of a planning application. You do not submit a tree report as part of pre-application consultations.

A reply was sent to DF from our planning consultant to address this bias to our pre app but it's obvious DF did not consider that report in a fair and robust manner. Another concern by DF was that the relocation was on private land, with commercial gains. It had been clearly explained to DF that the Sutton proposal was to be set up into Public Interest Company operated by the community with the land to be purchased or leased. The relocation is on land already in the DCO area.

These are just some of the points that show that the NH objective review was flawed.

In August 2021 after an online meeting we were asked to submit a Planning Pre App something we had asked Tarvinder about when the process started and we had been assured that this was not required. We submitted this in September, we chased PCC planning and in late December an officer visited the site and they issued myself their planning report on 22nd January, which just happened to be the day when Arcadis, DF, DCO, HE, and PCC planning with Sam Falco decided on either the local proposal or NVR. At this point we knew how biased this process was becoming.

We know NVR put in a request for the station before our application, and Chris Griffin had a visit to Railworld, but at no time did anyone from DF afforded the time to discuss or present our vision for the station by our community, what conclusion can we make from this?

1. It was already a done deal to NVR, but NH had to go through with a process because the "local community" has a plan.
2. Was NH / DF played by your "independent" experts.
3. Besides the community usage of the relocation, we gathered a lot of support from those using the Landyke Trails and a growing interest and usage with this heritage building within our community. It was also seen as a midway point with connectivity between 5 parishes that the new road scheme will divide.
4. This was an important wildlife corridor, but decisions have to be made within the DCO that now render this much less useful. This is an NH design and it fails to ensure the continuation of the disused track bed being a suitable wildlife corridor, which has really existed since 1929 when the last train operated. A reason for the station to be relocated to the south side of the bridge was to try and offer up some protection to the immediate area, be this the banks of the River Nene, nearby woodland, and the underpass created under the new A47 and angled rail bridge. This will be used by walkers cyclists and horse riders as the only safe crossing on the road scheme. It only takes a small number of people with unsocial activities to create insecure situations or environmental damage. We have already sent pictures to NH of occurrences from this summer in nearby parkland. Our plan for the station was, besides its community use, to also have in residence a caretaker family to open and safe guard the facilities the station could offer to those using the WCHER route, at the same time as offering an enhanced protection to the surrounding environment. After the road scheme this possibly will become a greater issue with the future development of the Homes England land, again information and concerns forwarded to Tarvinder Gohel and Chris Griffin. As you can see above the relocation of the station does have implications with the design and future use of the scheme.

2.3 Compliance with National Highways Guidance for Designated Fund Schemes

Working from a website dedicated to DF, something that had not been referenced by any officers of NH, or DF, it is clear that all schemes must comply with the Funding Principles. Any proposal should align with **ALL** or **MOST** of the principles.

Assessment of our local community relocation of the station would have satisfied all 14 Principles.

We do not have access to all details provided in the NVR proposal but can only see 5 principles, they could adhere or satisfy. The following are examples of the comparative compliance of the two schemes:

1. **Principle 2.** Go over and above the traditional focus of road investment adding value to our customers, local communities and our stakeholders. NVR and Railworld situated 11 miles away do not relate to the local community.
2. **Principle 7.** Improve the efficiency of our road network and/or our operations. The local relocation would have helped to keep the WCHER at this connection crossover safe and secure. Even a place to recharge an electric bike, with green energy from the relocation. The NVR option has no such benefits.
3. **Principle 12.** Be on the Highways England estate or have a clear relationship with it. The NVR/Railworld site has no relationship with this scheme..

2.4 Other Considerations

There are a number of other considerations that should have been part of the National Highways thinking but we can find no sign that they have been taken into account.

1. The only road access to Wansford Road Station uses an extremely dangerous access onto the busy A47. To relocate the station to NVR/Railworld, it will have to be dismantled, packaged, taken by truck to site, stored and then unpacked. This has a high risk to the components of the structure. For the community plan, the components can simply be transported along the rail bed with no risk to people or the station structure.
2. The local relocation can be carried out quickly and to a flexible schedule to suit the road scheme programme. The NVR option is much less flexible.
3. The NVR scheme requires considerable external funding because of the transport costs and the issues of rebuilding on the crowded Railworld site. The community scheme has a much lower cost to designated funds as it is much cheaper and has already attracted offers from local industry to support the project.
4. Project risks. The community scheme relocates the station on to land that is well known to the proposers and is a clean site with good ground conditions. By contrast, Railworld is on alluvial silt close to the river and the site has had several generations of industrial use. There is a high chance of contaminated ground, with its associated very high costs.

3 Conclusions

It is clear that the decision making process in several areas of the A47 Wansford to Sutton Dualling programme has been badly flawed.

A47 Wansford to Sutton – Wansford Road Station, Sutton

In particular the decision to give the Wansford Road Station to Nene Valley Railway rather than to the local community has been biased by individuals having other agendas rather than applying the principles that are clearly set out in National Highways documentation. Had the selection procedure been open and transparent, the local community would have accepted the conclusion. Clearly these criteria have not been met and the community will push to get the decisions reviewed.

From: [REDACTED]
To: [TRANSPORTINFRASTRUCTURE](#)
Subject: A47 Dualling Project Wansford to Sutton
Date: 06 January 2023 15:02:08
Attachments: [Planning Inspectorate drawing settlement pond](#)

Dear Rachel Dominey,

For the attention of the Rt Hon Mark Harper MP

I have attached two drawings with this email. The PDF drawing is the road waste water settlement pond that was on the Environmental Masterplan document placed before the Planning Inspectorate and probably the same drawing placed in front of the Secretary of State for Transport for approval. This area of land is the lowest point situated midway along the road scheme, all on a County Wildlife Site. The land is limestone meadow and alluvial soil down to the River Nene and the confluence of Wittering Brook, a fast-flowing brook drawing its water from Burghley Park and the White Valley near RAF Wittering

In November at a stakeholder's consultation, we were shown the latest scheme drawings which showed the much larger settlement pond - shown in purple on the above drawing. After weeks of asking for a detailed map which has been extremely slow to materialise all I can offer is this poor-quality thumbnail image.

What it clearly shows is a much larger pond which now is placed on the edge of the reengineered floodplain and 50 metres from the banks of the brook and river, this cannot be right, it is a design failure on the environment. This settlement pond may have been made larger to withstand 1 in 100-year events due to climate change but now with this size and location it is now in the wrong location. If major road incident occurs involving tanker transport, the pond would be the cargo's final destination. I have written to both the Environment Agency and Natural England and am awaiting their response.

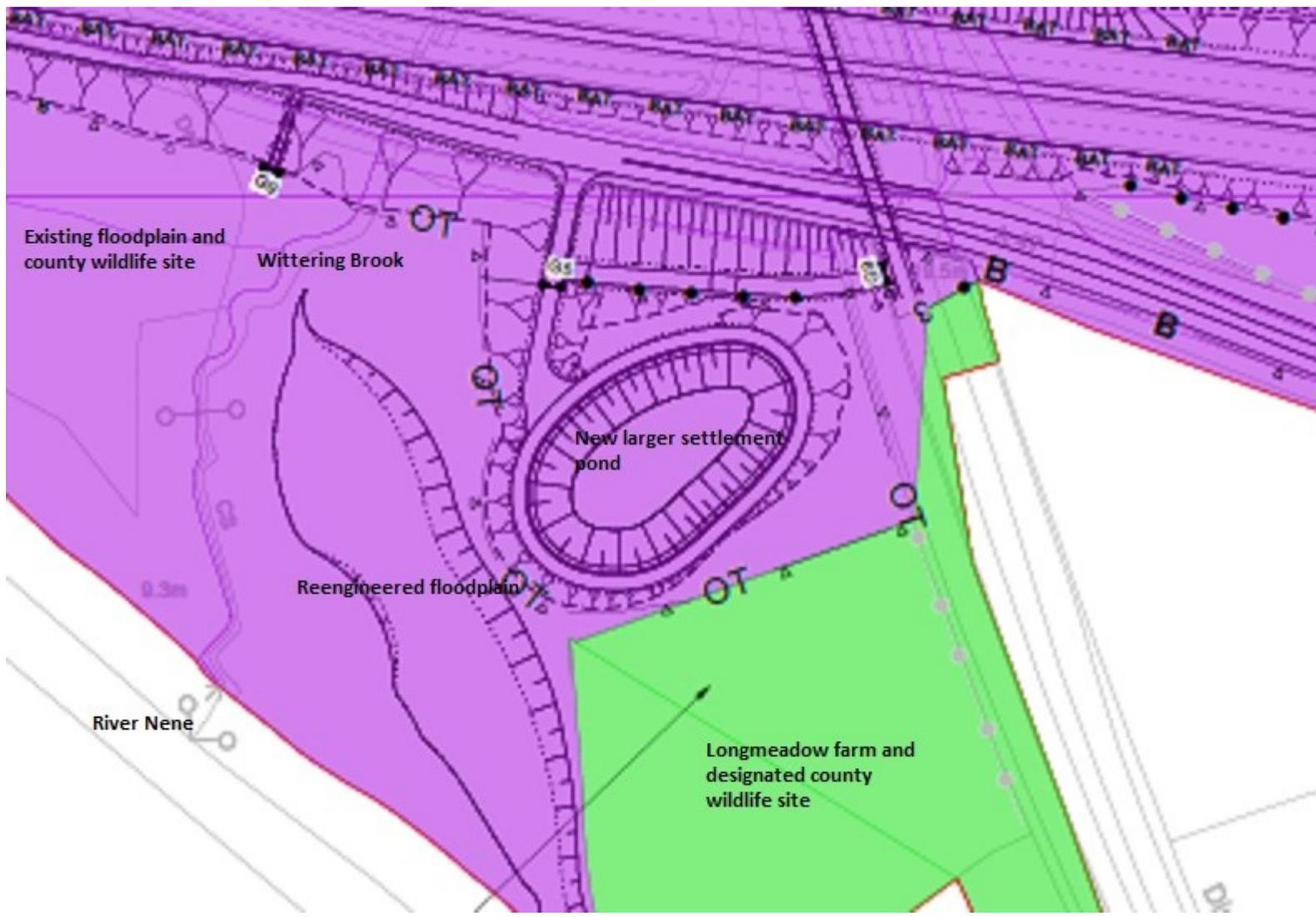
We hope the Department of Transport will request further scrutiny on this project and we also feel Historic England should be held to account on this because they are the root cause of this expensive environmental carnage along the slopes and floodplain of this part of the River Nene. This is a poor design and could also be a very expensive design.

Yours sincerely

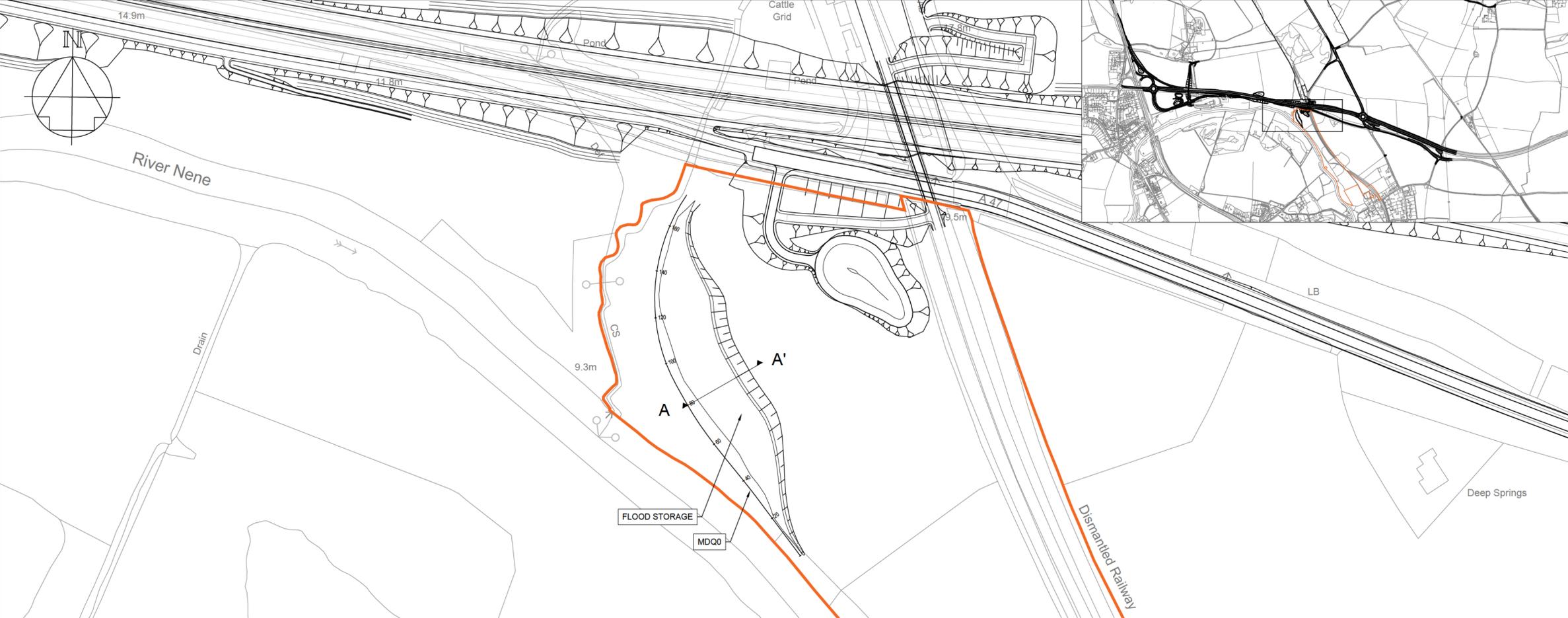
Robert W Reid

PS will also send this as a letter / paper copy.

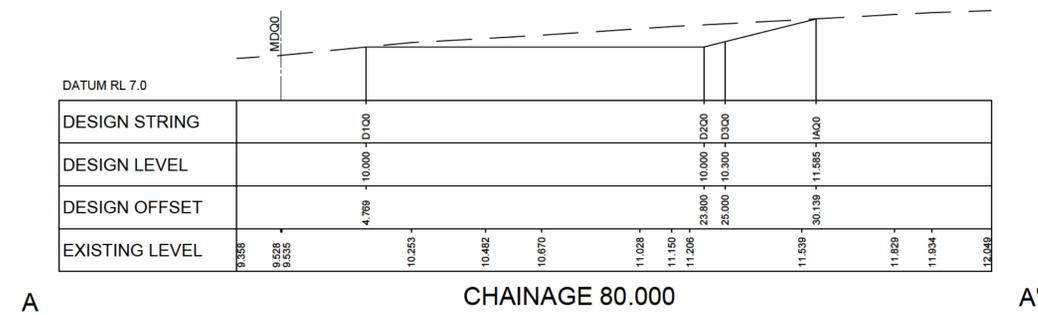
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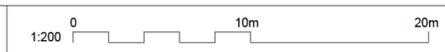
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PLAN VIEW
SCALE: 1:1000M



CROSS SECTION (A - A')
SCALE: 1:200M



- NOTES**
- THIS DRAWING SHALL BE USED FOR THE PURPOSE SHOWN IN THE TITLE BOX ONLY.
 - ALL DIMENSIONS ARE IN METRES UNLESS STATED OTHERWISE.
 - DO NOT SCALE FROM THIS DRAWING.

KEY TO SYMBOLS

CROSS SECTION	
---	EXISTING GROUND
—	PROPOSED DESIGN
— (Orange)	LAND OWNER - JANE MARY REID

REV	DATE	REVISION NOTE	ORG	CHKD	APPD
P01.01	—	—	—	—	—

DESIGNER



CONTRACTOR



CLIENT



PROJECT TITLE

A47 WANSFORD TO SUTTON DUALLING

PROJECT STAGE

PCF STAGE 3

DRAWING TITLE

FLOOD STORAGE OPTION 1
PLAN VIEW, CROSS SECTION

SUITABILITY

WORK IN PROGRESS

SHEET SIZE	SCALE	STATUS	REVISION
A1	1:1000	S0	P01.01

DRAWING NUMBER
HE551494-GTY-EWE-000-DR-CH-00001