



Your ref: TR010039

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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 THE APPLICANT AND ALL
INTERESTED PARTIES**

Please find below the response by National Highways ("the Applicant") to the letter from the Secretary of State dated 27 January 2023.

Carbon Emissions

Points 1 and 2

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 However, he is mindful that these figures have since been superseded in light of the additional information regarding construction emissions provided by the Applicant in its response dated 17 January 2023.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.*

Applicant's Response

Point 1

The Applicant confirms that the revised carbon figures provided in its response to the Secretary of State on 17 January represent a reasonable worst case for the Scheme. Further information on this assessment is provided in response to Point 2 below. As has been discussed at length throughout the examination and outlined within Environmental Statement (ES) Chapter 6 – Cultural Heritage (**REP2-010**), moving the Scheme northwards has been ruled out due to the location of the scheduled monument. The Applicant has nothing further to add to the responses submitted in that regard.

Point 2

The figure in ES Chapter 14 (**APP-052**) paragraph 14.8.9 is a typographical error and the Applicant apologises. The paragraph should have stated that the Proposed Development would produce less than 0.001% (0.00078%) of the UK's Fourth, Fifth and Sixth carbon budgets. This figure is derived from the total construction and operational emissions through the budget periods.

This figure has now been superseded by the additional information in the Applicant's response dated 17 January 2023. As requested, this total has now been expressed as a percentage of the total emissions against each relevant carbon budget in the table overleaf.

Project Stage	Carbon emissions distributed per relevant carbon budget (tCO ₂ e)				Estimated total emissions over 60-year appraisal period (tCO ₂ e)
	Fourth (2023 to 2027)	Fifth (2028 to 2032)	Sixth (2033 to 2037)	2038 to 2087	
Baseline (DM)	4,599,108	7,465,037	7,214,859	65,498,023	84,777,027
Construction (DS)	22,142	-	-	-	22,142
Operation (DS)	4,603,419	7,471,531	7,220,487	65,542,897	84,838,334
Total (DS)	4,625,561	7,471,531	7,220,487	65,542,897	84,860,476
Difference (DS-DM)	+26,453	+6,494	+5,628	+44,874	+83,449
National Carbon Budgets (MtCO ₂ e)	1,950	1,725	965	N/A	
Scheme percentage of relevant budgets	0.0014%	0.00038%	0.00058%	N/A	

Note: The construction carbon value is representative of the National Highways Carbon Tool assessment. The operational carbon value is representative of estimated operational energy plus estimated user utilisation emissions for the ARN over the 60-year appraisal period. DM = Do Minimum, DS = Do Something

The construction and operation of the Scheme through the Fourth carbon budget is 0.0014%, whilst the operation of the Scheme through the Fifth and Sixth carbon budgets is less than 0.001%. The sum of construction and operational emissions through the Fourth, Fifth and Sixth carbon budgets is 0.00083% – this is a slight increase from the 0.00078% within paragraph 14.8.9 of ES Chapter 14 (**APP-052**).

Drainage

Point 3

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.

Applicant's Response

Representation by Mr R Reid

The 'waste water settlement pond' referenced in Mr Robbie Reid's representation dated 6 January 2023 is a drainage basin. These are provided across the Scheme to attenuate surface water runoff. Their purpose is to facilitate settling of particulate pollutants before discharging to ground or to a nearby water course. This will provide an improvement to the existing scenario with regards to flood prevention and pollution mitigation.

A drawing of the drainage basin was shown to Mr Reid during a project update presentation on 15 November 2022, to share how the detailed design was developing. The referenced drainage basin is within land to be acquired permanently within the Order Limits. The increase in size of the drainage basin has been as a result of detailed design development. The following updated parameters were requested by Peterborough City Council as the Lead Local Flood Authority (LLFA):

- Climate change allowance uplift from 20% to 40% (required for all A47 schemes). The 20% to 40% climate change allowance uplift is based on Defra guidance on climate change, which shows anticipated changes in extreme rainfall intensity in small and urban catchments. It is recommended that a 40% increase in rainfall intensities be applied to residential, commercial and other types of development where the proposed lifespan of development exceeds 2069. This has been the agreed approach with the Peterborough City Council as LLFA, and is now adopted by LLFA's nationwide when considering sites with the potential for both Fluvial and Pluvial risks and the potential of combined risk
- Updated ReFH2 rainfall data resulting in increased rainfall from previous results. ReFH2 is the latest version of the Revitalised Flood Hydrograph (ReFH) model used in the application of drainage design

A part of the development of the detailed design for the drainage basin, the design has been altered to suit the local topography. The changes are not expected to give rise to any materially new or materially different environmental effects in comparison with those reported in the ES. This will continue to be assessed as the detailed design progresses.

As currently drafted in the DCO (submitted by the Applicant on the 23 December 2022 and published on the PINS website), certain requirements are proposed to be discharged by the Secretary of State for Transport, following consultation with certain bodies.

Detailed design is included as a Requirements in the draft DCO (Requirement 3). This states that the development must be designed in detail and carried out so that it is compatible with the preliminary scheme design shown on the engineering drawings and sections unless otherwise agreed in writing by the Secretary of State, following consultation by the undertaker with the relevant planning authority and local highway authority on matters related to their functions, provided that the Secretary of

State is satisfied that any amendments to the engineering drawings and sections showing departures from the preliminary scheme design would not give rise to any materially new or materially different environmental effects in comparison with those reported in the ES. This therefore allows some amendments to the drainage basin design.

In addition, Requirement 8 'Surface and foul water drainage', and Requirement 9 'Flood compensatory storage' to the draft DCO allow for slight amends to the design of the drainage basins, as long as each part of the requirements are followed, the necessary consultation takes place, and the design does not give rise to any materially new or materially different environmental effects in comparison with those reported in the ES.

With regards to County Wildlife Site, the design shown in the Environmental Master Plan (**REP8-014**) includes the planting of individual trees, woodland, and species rich grassland. The impact of the Scheme on the County Wildlife Site has been assessed (Chapter 8 Biodiversity of the ES) (**AS-015**) on a worst-case scenario basis, and the assessment is that the Scheme provides a positive Biodiversity Net Gain.

Protected Species

Point 4

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.

Applicant's Response

The Applicant submitted the Natural England Letter of No Impediment (LONI) for bats dated 23 January 2023 with its response letter to the SoS on 26 January 2023. Subsequently, Natural England also submitted this LONI and covering letter to the SoS on 27 January 2023.

Other submissions submitted to SoS and attached to the letter dated 27 January 2023

Gareth Martin (Archaeology)

This submission is noted. The points raised in Gareth Martin's letter are already addressed in ES Chapter 6 – Cultural Heritage (**REP2-010**).

Yours sincerely,



Craig Stirzaker
Project Manager
National Highways