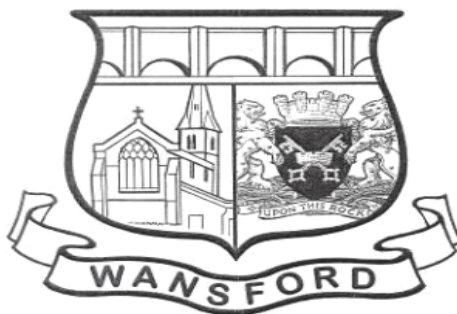


Wansford Parish Council

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



9th February 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)
REQUEST FOR COMMENTS FROM ALL INTERESTED PARTIES IN RESPONSE
TO THE 27th JANUARY and 3rd February 2023 CORRESPONDENCE**

Thank you for the letter dated the 6th February 2023 inviting comments from all interested parties to the letters from Natural England and the Applicant.

With regard to the correspondence from Natural England, Wansford Parish Council has no comment except to note that the scheme appears to be evolving significantly as it moves into the detailed design phase. If the DCO is granted, Natural England will have to review the final design to check that it still complies with the various consents granted.

Wansford Parish Council has the following comments on the Applicant's letter dated the 3rd February 2023.

Point 1 – Carbon emissions issues raised by Climate Emergency Planning and Wansford Parish Council

We note the Applicant's statement that the carbon figures are a reasonable worst case for the Scheme but he has offered no justification for this. Surely at least a comparison with the median figure is required.

There is only an indirect reference to the sequestered carbon item raised by Wansford Parish Council and for this it refers to the Environmental Statement (ES) Chapter 6 – Cultural Heritage (**REP2-010**) as a justification for not considering an alignment further to the north and therefore not considering the change in soil types. That document includes the following statement:

The NPPF (paragraph 16) states: ‘where a development proposal will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use’.

National Highways has repeatedly stated that they cannot consider the routes through the Scheduled Monument “because there is a viable alternative”. As discussed at length, that alternative, the proposed alignment, has considerable public disbenefits in relation to cost, risk and public amenity. National Highways and Historic England have both refused to do an evaluation of the level of harm to the Scheduled Monument as a result of any of the routes suggested in the Alternative Visions document. At least one of these routes does little or no harm as it provides better clearance to the identified features than the present alignment.

National Highways response demonstrates that they have applied to wrong criteria when considering the relationship between the Scheduled Monument and the Scheme. This mistake will lead to irrevocable damage to the Nene Valley and goes against the community’s preference as expressed in the initial route selection consultation.

Point 2 – Typographical error in APP-052

Wansford Parish Council notes the revised figures shown in the National Highways table. While we have no way of checking these numbers, there appears to be an anomaly in the construction phase of the project.

The operation carbon value is shown as being less than 0.1% higher than the Do Minimum carbon value. During the construction work there will be considerable disruption of both the A1 and the A47 with diversions and traffic management in place. This will increase the amount of stop-start driving and idling and the distances driven during this period. It would be expected that this would lead to a larger increase carbon budget than the 0.1% shown.

Point 3 – Increased size of drainage attenuation pond and general impacts on the County Wildlife Site

While the changed design requirements may produce a larger attenuation pond at this location, it does lead to the question as to whether the pond is in the right place and whether it is now too close to the river Nene. The change is more than a “slight amendment” and it is not clear who would be consulted about such a change. In view of National Highways attempt at examination stage to cut the Parish Councils out of further consultation, they clearly have no interest in consulting the local community about such changes.

The statement that “the design does not give rise to any materially new or materially different environmental effects in comparison with those reported in the ES” is subjective and is not supported by any evidence from the Applicant. Certainly, a water body surrounded by bunds, and no doubt including bright orange life rings (as seen on the A14), will dramatically change the appearance of this section of the river valley, particularly when it extends close to the river as the revised version does.

The Environmental Master Plan (REP8-014) does indeed show some new trees being planted within the County Wildlife Site but it is unclear where these will be and exactly how they will contribute to the area, particularly as the base plan used is now out of date. If the example of the attenuation ponds is taken, the Contractor will have freedom to change the planting at detailed design stage. The plan also does not show the power poles that the Contractor intends to place close to the river and around the drainage pond.

The Applicant’s reference to the scheme providing a positive Biodiversity Net Gain to the County Wildlife Site is clearly untrue in any real life context. We do not know what scheme drawings were available to those doing the ES but it seems that the team did not realise the extent of the works. A new embankment extending towards the river, possibly with a large concrete cut off wall at its toe, will not enhance anything. It is notable that the ES only considered the species that were resident in the area and it did not consider the river valley’s role as a corridor for wildlife. Building out into the valley with a noisy road and artificial embankment will damage this corridor for ever.

The approach of National Highways seems to be to design a scheme that does environmental damage and then provide “mitigation”. This is a very dated approach where the engineering and environmental functions are separated. Most organisations now co-ordinate the activities so that the engineering is carried out to avoid environmental impacts, also removing the need for mitigation. This also avoids the uncertainty surrounding the success of the mitigation measures.

Should the Department require any clarification of these points, please feel free to contact Wansford Parish Council. While Wansford Parish Council supports the upgrading of this section of the A47, we would hope that the Secretary of State would tell the Applicant to reconsider the alignment of the road where it gets close to the river Nene.

Yours Sincerely

Marie Lewis

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