

Submissions received after the close of the Examination

TR010039

A47 Wansford to Sutton

Last updated: 17 February 2023

Date Examination closed: 11 July 2022

Date of Recommendation Report: 11 October 2022

Date of Decision: 17 February 2022

Submissions made after the Examination closed (appended below)		
Number	Date submission received by the Planning Inspectorate (PINS)	Name of party and description of correspondence Date submission forwarded to Secretary of State (SoS)
Submissions received during Decision		
1	12 December 2022	R. W. Reid Letter and accompanying report - reasons for no longer supporting or agreeing with National Highways on final design
2	15 February 2023	National Grid Email - NGED withdraws relevant representation
3	29 September 2022	Wansford & Sutton Parish Councils Cover email, Alternative Visions, Letter to Trevelyan

Submission number: 1

Date submission received by PINS: 12 December 2022

Name: R. W. Reid



[Redacted]@hotmail.com

12th December 2022

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

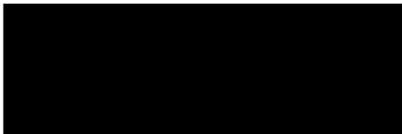
Dear Minister

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



K. 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

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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.

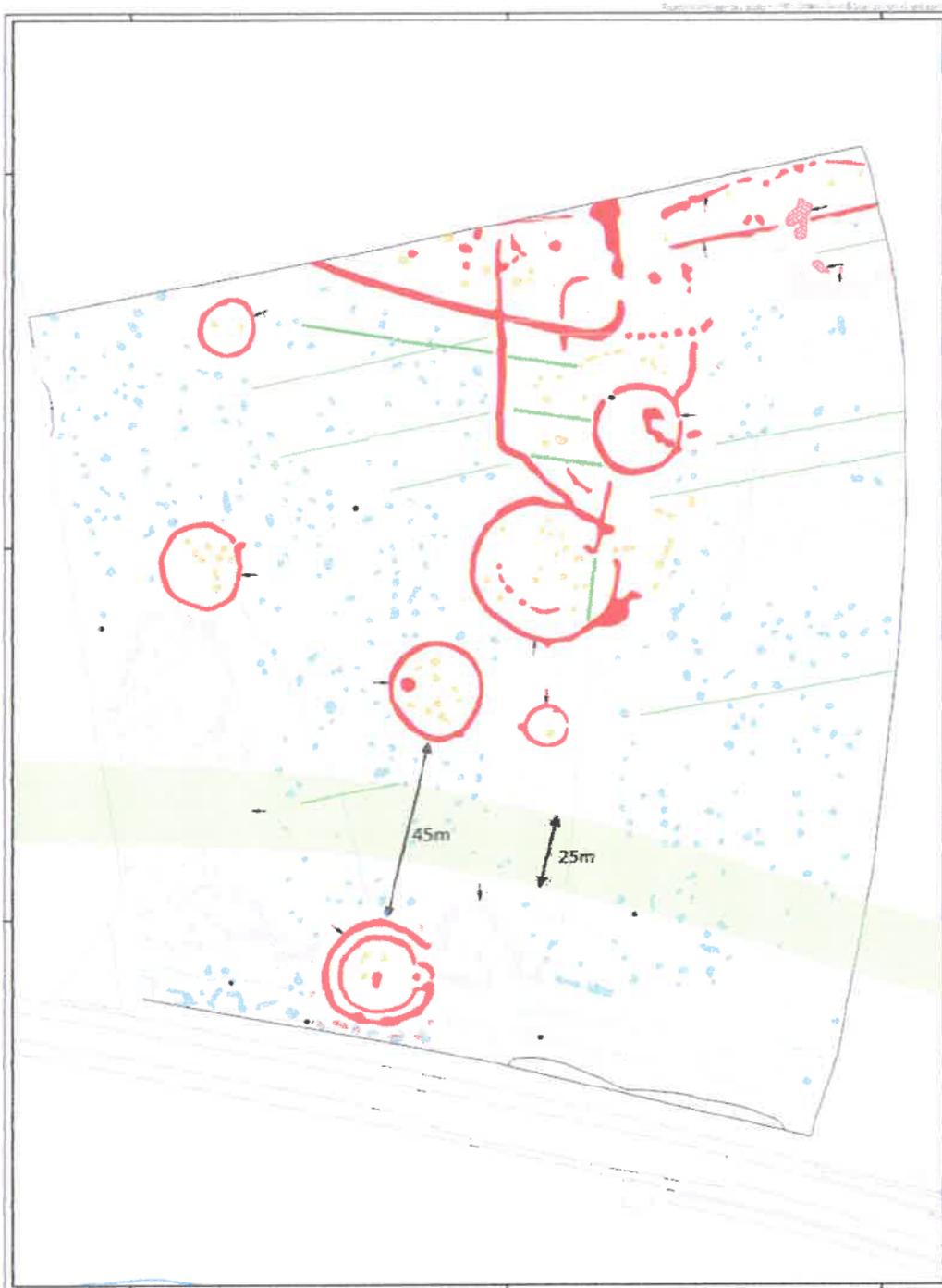


Figure 1 – Survey of the Scheduled Monument showing a possible road alignment

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).

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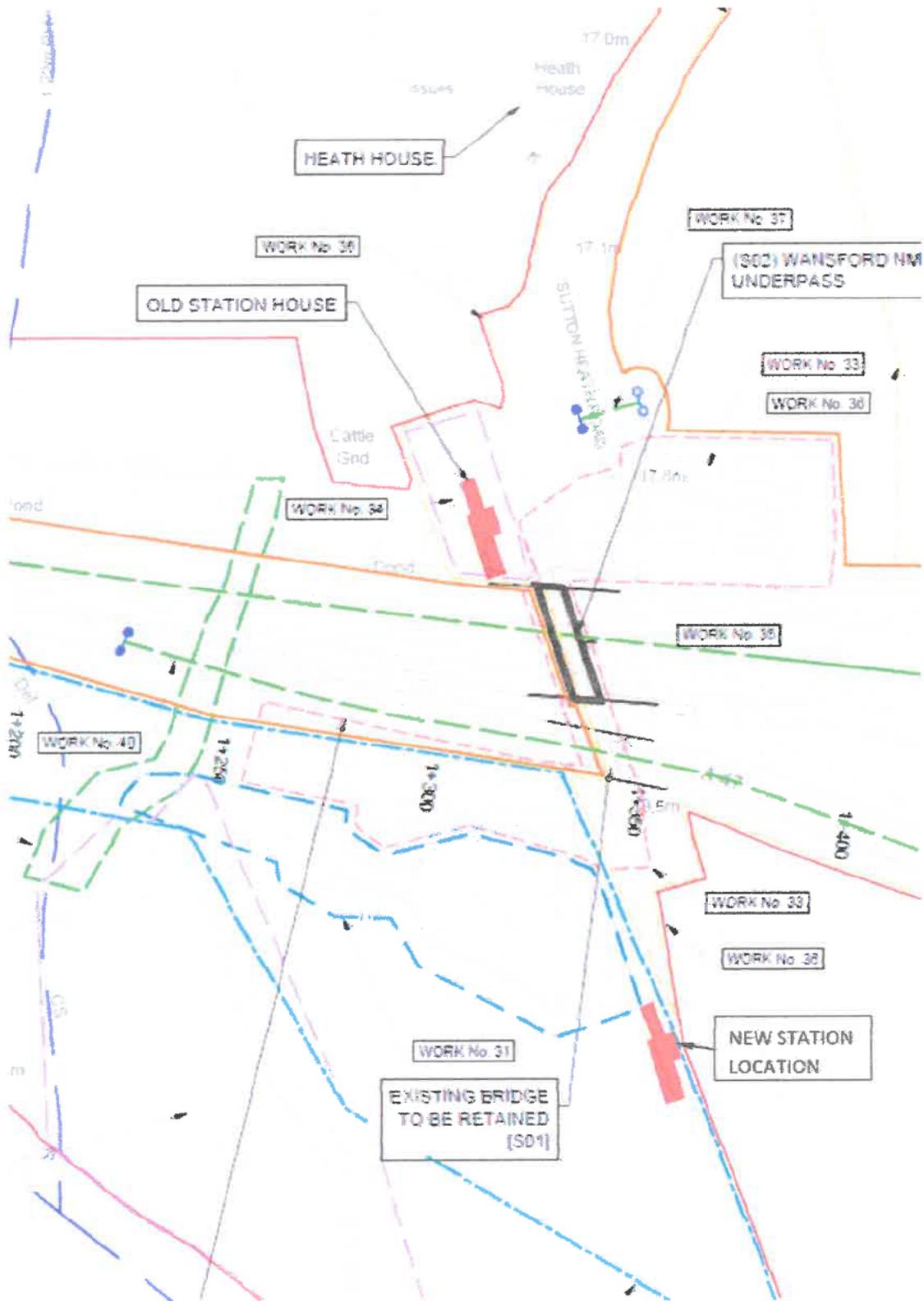


Figure 2 – The community proposal to relocate Wansford Road Station

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.

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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.

Submission number: 2

Date submission received by PINS: 15 February 2023

Name: National Grid

By Email

A47WansfordtoSutton@planninginspectorate.gov.uk

The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol, BS1 6PN

Our reference JTY/1169650/122916298.1/JTY

Your reference TR010039

15 February 2023

Dear Sir/Madam

**Application by National Highways Limited for an Order Granting Development Consent for the A47 Wansford Scheme (the "Application")
National Grid Electricity Distribution (East Midlands) Plc - withdrawal of relevant representation**

We act for National Grid Electricity Distribution (East Midlands) Plc ("**NGED**"), who made a relevant representation to the Application on 14 October 2021.

NGED and the Applicant have now reached a satisfactory agreement and commercial terms for the protection of NGED's apparatus.

Accordingly, in light of the above, NGED withdraws its relevant representation to the above Application.

Yours sincerely

Josh Taylor

Associate Director

for Osborne Clarke LLP

T [REDACTED]

E [REDACTED]@osborneclarke.com

Osborne Clarke LLP

2 Temple Back East, Temple Quay, Bristol, BS1 6EG or DX 7818 Bristol T +44 117 917 3000 F +44 117 917 3005

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[REDACTED]

Submission number: 3

Date submission received by PINS: 29 September 2022

Name: Wansford & Sutton Parish Councils

From: [POCorrespondence](#)
To: [REDACTED]
Subject: Chapter 412482 - FW: IMPORTANT: Wansford & Sutton Parish Councils - A47 Dualling
Date: 29 September 2022 13:53:59
Attachments: [REDACTED]

MC for Katherine

**Rosemary Apelogun | Private Office Correspondence, , Department for Transport
1st Floor |** [REDACTED]

From: Transport Secretary <transportsecretary@dft.gov.uk>

Sent: 29 September 2022 12:07

To: POCorrespondence <POCorrespondence@dft.gov.uk>; [REDACTED]
[REDACTED]@dft.gov.uk>

Cc: [REDACTED]

Subject: FW: IMPORTANT: Wansford & Sutton Parish Councils - A47 Dualling

**Grace Simkins | Private Secretary to Clive Maxwell, HSR DG Office, HSMR DG Office, Department for
Transport**

1/02 | [REDACTED] |

Post to: Great Minster Hse, 33 Horseferry Rd, London, SW1P 4DR

From: clerk@wansford-pc.gov.uk <clerk@wansford-pc.gov.uk>

Sent: 29 September 2022 12:00

To: Transport Secretary <transportsecretary@dft.gov.uk>

Cc: [REDACTED]k

Subject: IMPORTANT: Wansford & Sutton Parish Councils - A47 Dualling

To: The Rt Hon Anne-Marie Trevelyan, MP

Secretary of State for Transport

Copy to: The Rt Hon Shailesh Vara, MP for North-West Cambridgeshire

Dear Minister

I would respectfully ask that you read the attached letter from the Chairman of Wansford Parish Council and the letter's attachment and give all content your full attention and consideration.

With grateful thanks,

Regards,

Marie Lewis

Clerk of Wansford Parish Council

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



WANSFORD PARISH COUNCIL

www.wansford-pc.gov.uk

Parish Clerk: Mrs M Lewis

clerk@wansford-pc.gov.uk

Tel: [REDACTED]

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

28 September 2022

The Rt Hon Anne-Marie Trevelyan MP
Secretary of State for Transport
The Department for Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR

Dear Minister

Application by National Highways for an Order granting Development Consent for the A47 Wansford to Sutton Project

The Department will shortly be receiving the Planning Inspectorate Report on this project as a briefing for your decision. Wansford Parish Council has been very impressed with the Inspector's work but we understand that the cost of the project is outside his brief. As with all such developments, cost is a very significant issue both at the construction stage and for the long-term maintenance of the road. The comments below only apply to a short length of the proposed road but this section has potentially high costs and it also has considerable environmental impact.

When the project was first launched, there was a non-statutory consultation on three alternative routes and the route preferred by the majority of the consultees was the northern route. Ignoring this, National Highways opted for the southern route. Following this decision, Wansford Parish Council published a document entitled "A47 Wansford to Sutton – Alternative Visions". This was also given to the Planning Inspectorate and is attached for your consideration.

In this document there is a table which describes the advantages and disadvantages of National Highways preferred route and which is also shown below:

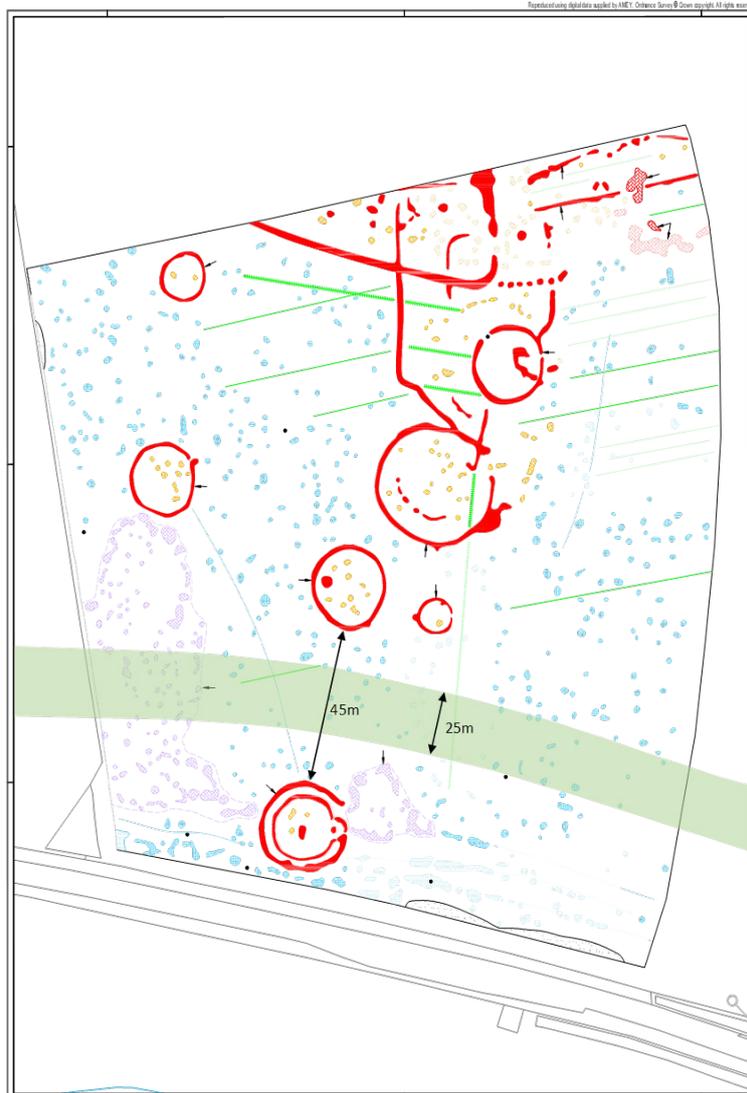
Table showing the advantages and disadvantages of National Highways preferred route

Advantages	Disadvantages
Avoids the Scheduled Monument	Cost estimated at £6 million more than the northern route
	Introduces serious geotechnical risks with the likelihood of much increased costs
	Destroys two County Wildlife Sites
	Destroys numerous trees with TPOs
	Impinges on the area of High Landscape Value
	Disrupts the wildlife corridor along the river
	Makes the provision of a safe through route for cyclists, pedestrians and horse riders very difficult
	Moves the road closer to houses increasing noise
	Opposed by the majority of residents from the surrounding communities because of landscape damage to the Nene Valley
	Destruction of archaeology south of the existing road
	All of the proposed route is land in private ownership requiring compulsory purchase from several land owners.

Since this initial decision, National Highways have adopted the road alignment suggested in Alternative Visions at the eastern end of the scheme but there are still issues in the area of the Scheduled Monument.

The Scheduled Monument is a flat field that has been extensively ploughed and has had land drains installed. The only investigation of this area was carried out by National Highways and this shows a single ring ditch feature in the southern part of the area and a 45m wide gap before the next nearest feature. This is ample space for the new road and indeed the road is further from the southern feature than it is at present. Historic England have stated that “the space between the features is just as significant as the features themselves” but they have produced no justification for their statement. The Scheduled Monument layout and a possible road alignment are shown below.

Wansford and Sutton's proposed route for the A47 which crosses the Scheduled Monument to the north of the south barrow



The Parish Councils have repeatedly asked for a joint meeting with National Highways and Historic England to discuss this but National Highways have blocked such a meeting.

Avoiding the whole area of the Scheduled Monument means that the new road has to be built over the river escarpment which has a proven track record of instability. The pumping station and the filling station immediately to the west of the site have both slipped and all the power poles along the escarpment are lying over at an angle. Although the risks can be mitigated by good engineering, they can never be removed entirely and the cost of that engineering is significant. Putting the road on the escarpment also impinges on a valuable county wildlife site and means it is almost impossible to widen the road in the future. The cost of the extra engineering, traffic management and services diversions to avoid the Scheduled Monument has been estimated by National Highways at different times as £6 million or £11 million. National

Highways has been asked to update these figures but their reply was “the cost of the project is of no concern to us”. This is an interesting attitude to the use of public money. They have also stated that possible future widening of the road is not a consideration as far as they are concerned.

Wansford Parish Council requests the Secretary of State to take these matters into consideration before approving the project and to ask National Highways to look again at the scheme in the area of the Scheduled Monument.

In addition to this problem at the Scheduled Monument there is an issue with the capacity of the A1/A47 junction within Wansford Village. The long-term solution to this is to realign the A1 further to the east as was planned in 1994. In the short term, Wansford Parish Council has suggested the use of an intelligent traffic light system instead of the existing undersized western roundabout (the local land contours mean that the roundabout cannot be enlarged). National Highways have declined to investigate this option, claiming that it is outside the scope of the project. It is clear that they think of roads as corridors not as part of a network. It will be fine to have an improved A47 but there is little point if the connection to the major north-south artery is inadequate. The Inspector will probably have commented on this but Wansford PC would ask the Secretary of State to consider the adequacy of the A47/A1 junction.

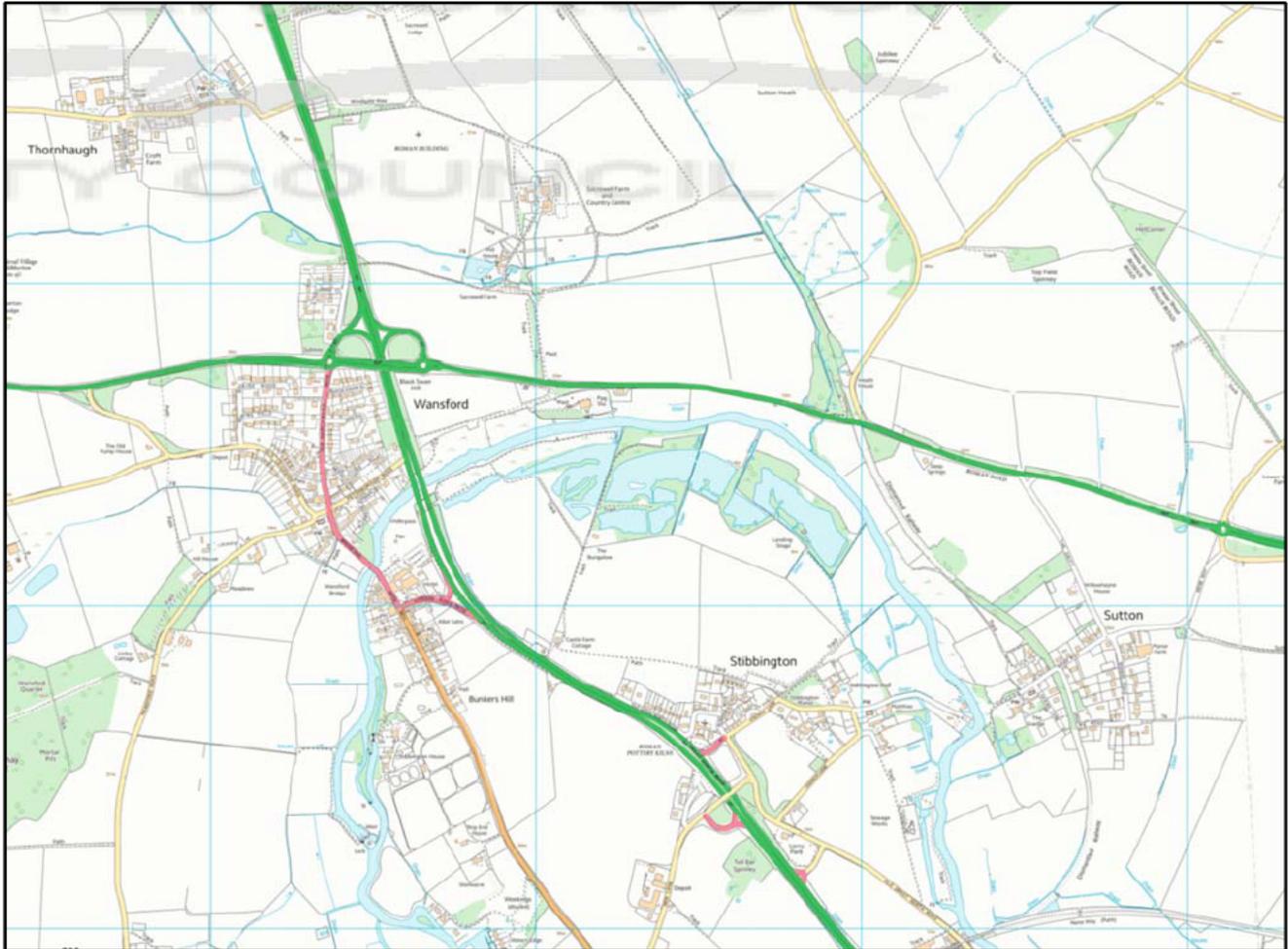
Yours sincerely

John Stannage

Cllr John Stannage
Chairman of Wansford Parish Council

Copy to:
The Rt Hon Shailesh Vara, MP for North West Cambridgeshire
House of Commons
London SW1A 0AA

Encl. A47 Wansford to Sutton - Alternative Visions



A47 Wansford to Sutton

Alternative Visions

4th July 2018

Wansford Parish Council

Sutton Parish Council

A47 Wansford to Sutton

Alternative Visions

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1 Introduction

1.1 Purpose of this Document

This document has been produced by Wansford Parish Council and Sutton Parish Council, as the elected representatives of the local community, in consultation with the A47 Community Consultation Team (ACCT) comprising members of both parish councils and residents. The purpose is to set out an alternative vision for the upgrading of the A47 to dual carriageway between the A1/A47 junction at Wansford and the start of the existing dual carriageway at Sutton.

1.2 Why This Document is Needed

Both parish councils have asked repeatedly to discuss the project as a group with Highways England and the various statutory planning and environmental organisations involved but Highways England has excluded the Parish Councils from these meetings. The parish councils are very concerned that a balanced view of the issues has not been presented to the other parties. This document sets out the arguments involved and explains why we believe that Highways England has taken the project down the wrong path. This view has been explained to Highways England repeatedly but they appear to have taken little notice of it.

1.3 Background to the Project

The declared aim of the project to upgrade the A47 between Wansford and Sutton is to

- Support the economic growth of the region
- improve the capacity of this stretch of road,
- improve its resilience to disruption
- improve safety
- improve the environment along the road
- give value for money
- improve access along the route for cyclists, pedestrians and horse riders.

Wansford Parish Council and Sutton Parish Council fully support these aims and, at meetings with Highways England, the councils expressed a wish to work to maximise the benefit to the local communities and all users of the A47 while delivering value for money and minimum environmental impact.

1.4 Progress of the Project to Date

In March and April 2017, Highways England carried out a non-statutory consultation on the selection of the preferred route for this project. The information that was published consisted of a constraints map, shown as Figure 1 below, and three route alternatives shown as Figures 2, 3 and 4.

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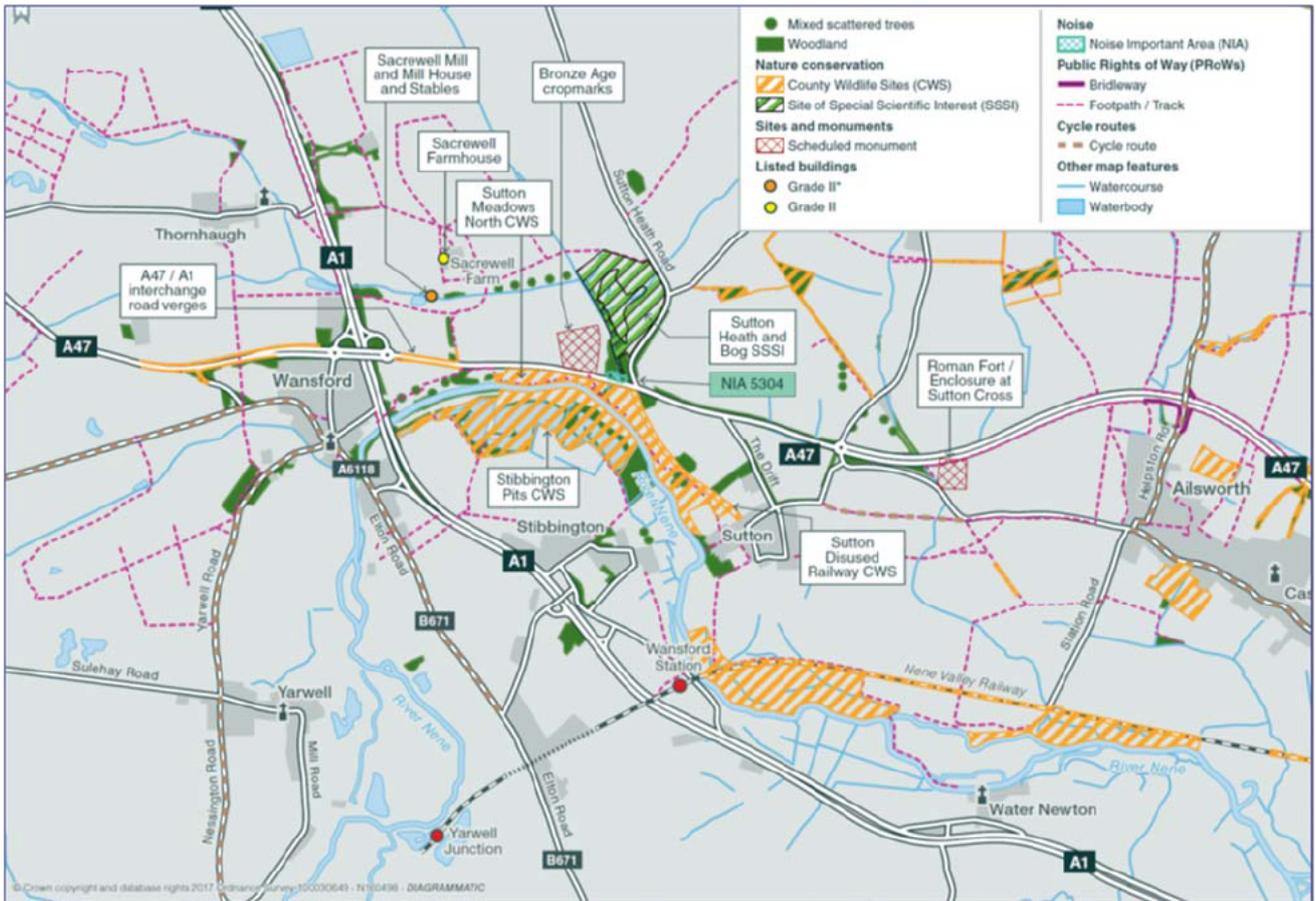


Figure 1 – Highways England environmental constraints plan

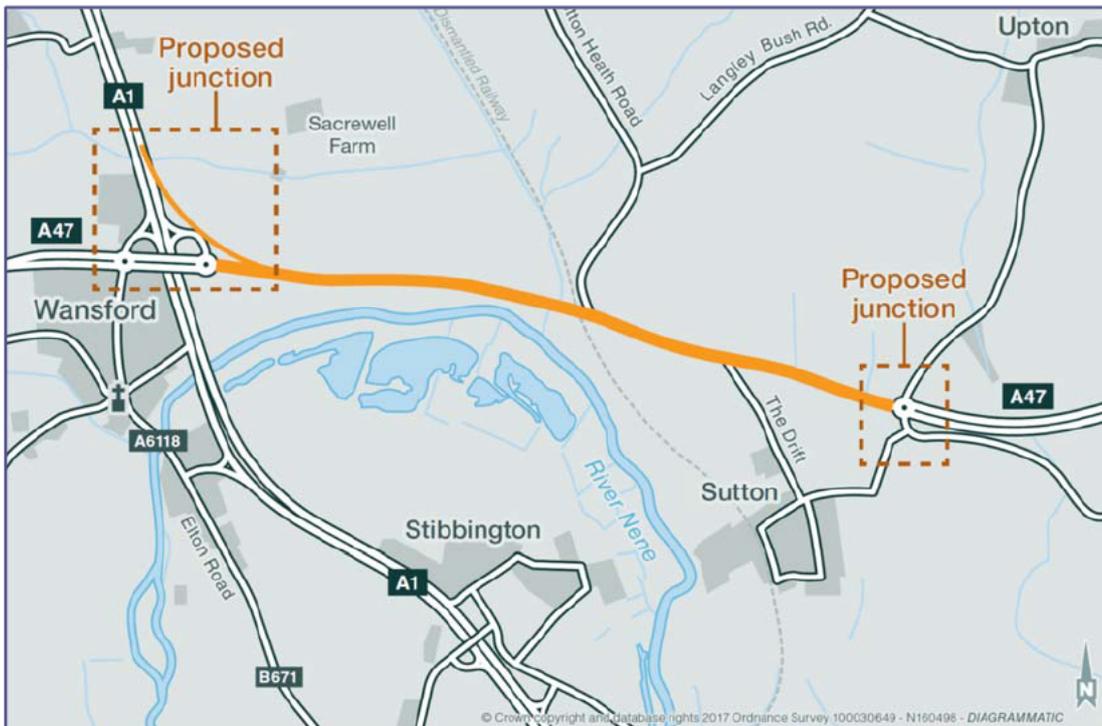


Figure 2 – Highways England Route Option 1 – Construction on the Existing Alignment

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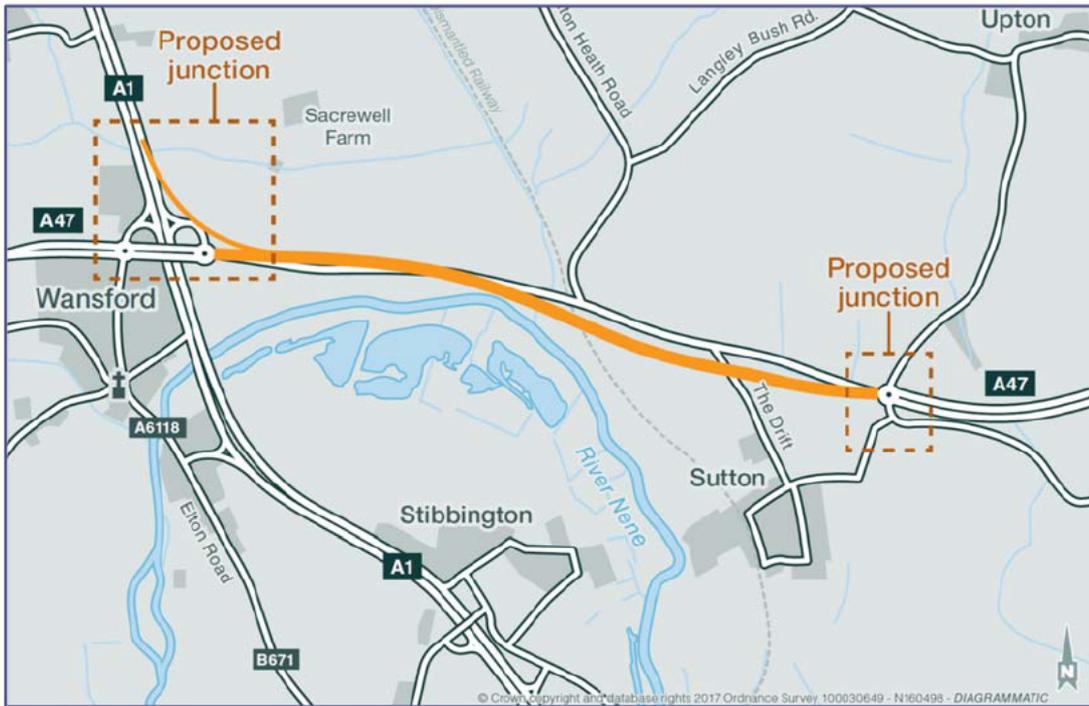


Figure 3 – Highways England Route Option 2 – The Southern Route



Figure 4 – Highways England Route Option 3 – The Northern Route

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62% of those who responded to the consultation favoured the northern route but in August 2017, Highways England published the preferred route as the southern route. The reasons given for this were:-

1. The northern route impinged on a Scheduled Monument (shown as “bronze age crop marks” in the constraints plan).
2. The northern route crossed the Sutton Heath and Bog SSSI.

Both these issues were known about before the consultation and so it seems strange that Highways England included the northern route at all. Subsequent investigations have shown that the northern route does not need to cross the SSSI.

No further details of the decision process were given but the minutes of the meeting were finally published in April 2018 some 10 months after the decision meeting was held.

2 Shortcomings of the Preferred Route Decision

In the minutes of the decision meeting, Highways England stated that the meeting was being held early because of time constraints on the project and that some information was incomplete. Normally the Preferred Route Decision is taken at the end of the Project Control Framework Stage 2 but in this case PCF Stage 2 was only part complete. Two months after the preferred route announcement was made, the project timetable was extended and it has since been extended further. Highways England has not revisited their decision despite the extended time frame.

Taking the published constraints plan and the decision meeting minutes as a guide, it is clear that the project team was not aware of many of the significant features of the area notably:-

1. The extensive archaeological interest in the area in addition to the Scheduled Monument.
2. The presence of the Nene Way footpath along the banks of the river. This is the most popular long distance path in the area. Only the much less popular Hereward Way is mentioned.
3. This area of the Nene valley is a designated Nature Improvement Area as part of an extensive regional programme.
4. The significance of the Nene valley as a wildlife corridor.
5. The status of the Nene valley as an area of High Landscape Value.
6. The Tree Preservation Orders that apply to the woodland to the south of the A47. These woods include significant numbers of oaks with girths in excess of 3 metres meaning they are of considerable age.
7. The presence of three locally listed buildings, the A47 bridge across the old Wansford to Stamford railway, Station House close to the bridge and Heath House further to the north.
8. No reference was made to the geotechnical risks associated with building a road between the existing A47 and the river Nene. This whole sloping area is known to be unstable with both the nearby filling station and the Anglia Water pumping station having moved down the slope. Highways England had been made aware of this.

When the Scheme Appraisal Report was finally published in February 2018 (6 months after it was written), it was clear that no proper desktop study of historic remains in the area had been carried out and that almost all the ecological and environmental studies were incomplete. The document is very

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generic with little information directly relating to the road alignment. This was picked up by the Planning Inspectorate in their March 2018 review of the Environmental Scoping.

3 Advantages and disadvantages of the Preferred Route

The southern alignment published as the Preferred Route by Highways England has the following advantages and disadvantages.

Advantages	Disadvantages
Avoids the Scheduled Monument	Cost estimated at £6 million more than the northern route
	Introduces serious geotechnical risks with the likelihood of much increased costs
	Destroys two County Wildlife Sites
	Destroys numerous trees with TPOs
	Impinges on the area of High Landscape Value
	Disrupts the wildlife corridor along the river
	Makes the provision of a safe through route for cyclists, pedestrians and horse riders very difficult
	Moves the road closer to houses increasing noise
	Opposed by the majority of residents from the surrounding communities because of landscape damage to the Nene Valley
	Destruction of archaeology south of the existing road
	All of the proposed route is land in private ownership requiring compulsory purchase from several land owners.

4 Optimisation of the Preferred Route

Since the preferred route announcement, Highways England has expended considerable effort on optimizing the southern route. The results of this have been discussed in meetings between the parish councils and Highways England.

The road alignment has been moved closer to the existing road, reducing the impact on Sutton Village and keeping the road further from the river. Although these changes are welcome, their effect is marginal and the main disadvantages remain. As part of keeping the road away from the river, the embankments have been steepened which significantly increases the geotechnical risk. The steeper embankments also make it more difficult to make provision for cyclists and horse riders.

Highways England has claimed that these changes substantially reduce the costs relative to the northern route. They have been asked to substantiate this but they have stated that the cost estimates are confidential, an unusual view to take on a publicly funded project. In the absence of any demonstration of reduced costs, it has to be assumed that the £6 million cost difference between the northern and southern routes still stands.

5 Discussion of the Preferred Route

Since the preferred route announcement, Highways England has held two public meetings to discuss the project. At both meetings it has been clear that most residents attending strongly oppose the use of the southern route.

In May and June 2018 Highways England held two meetings with representatives of the parish councils and various cycling and footpaths organisations. These discussions have been interesting but they have yielded very little factual information.

Highways England has met three times with Historic England and recently held a meeting with a group of all the environmental organisations who have an interest in the project. The parish councils have asked repeatedly to join these meetings but Highways England has excluded them despite the parish councils being statutory consultees in the project planning process. No minutes from these meetings have been shared with the parish councils despite repeated requests.

It is understood that Highways England have carried out non-intrusive ground investigations to look for buried features in the area. The results of the investigation of the Scheduled Monument have been given to the parish councils, but nothing else. Highways England have given copies of the reports on the other investigations and maps showing their extent to Peterborough City Council and Historic England but they have told the parish councils that they are not available yet.

It is understood from those who have seen the investigation report that there is no identified archaeological interest on the northern road alignment east of the old railway line. This is supported by an independent desktop study of the area commissioned by the parish councils.

6 Alternative Visions for the A47 Dualling

The local community has consistently backed the use of the northern route and, when subject to optimization similar to that applied to the southern route, the result is a layout as sketched in Figure 5

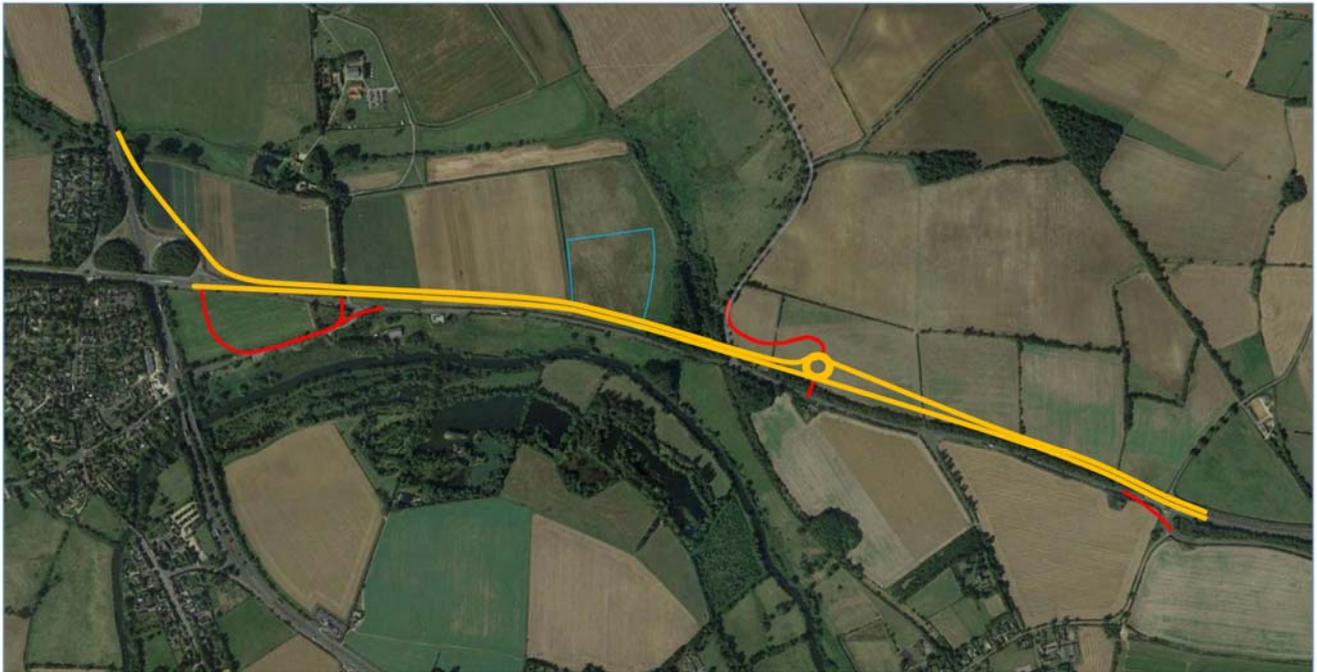


Figure 5 – An Alternative Vision of the A47 Dualling

The western end of this scheme is identical to the Highways England preferred alignment. It impacts the Scheduled Monument (see Section 7 for discussion of this), crosses the old railway line to the south of the Sutton Heath and Bog SSSI and joins a new roundabout just to the east. This roundabout provides a connection to the Sutton Heath Road and also to the existing A47 which is retained as a local service road. The new road then links to the existing dual carriageway with the existing Sutton roundabout being removed. The Upton road is closed with that village being accessed from Sutton Heath Road.

There are several possible variations of this scheme all using the same basic route:-

1. To leave the Sutton roundabout where it is and provide an underpass to link the Sutton Heath Road to the existing A47.
2. To remove the Sutton roundabout completely, use an underpass for the Sutton Heath Road, and have all access from Sutton and Ailsworth along the existing road to join the new road at the eastern Wansford roundabout.

Variation 1 is slightly more expensive while variation 2 will put more traffic on the existing road.

The advantages and disadvantages of this group of schemes are listed below. Comparison with the similar table for the Highways England Preferred Route makes it obvious why the parish councils believe the wrong decision has been made.

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Advantages	Disadvantages
Cost estimated at £6 million less than the southern route	Passes through the Scheduled Monument
Very low geotechnical risk	Requires the relocation of the old station building
Safeguards the County Wildlife Sites and woodland to the south of the existing road	
Keeps the Nene valley landscape intact	
Allows the use of the existing road for local traffic, cycling walking and horse riding	
Keeps the road away from houses	
Supported by the majority of local residents	
The eastern section of road is on land already in government ownership	

Although the old station house is classified as a building of local importance it is, because of its location, almost completely unknown to the residents of the area. The building is completely hidden from view with dense tree coverage and a very dangerous access onto the A47. The site is frequently subject to fly tipping from the Sutton Heath Road. The building has been substantially altered with white UPVC windows and other non-period features. It would be of considerably greater significance if it was relocated and there are a number of possible sites for this along the route of the long abandoned Wansford to Stamford railway. The best location is probably at Ufford Halt to the north. At this location there is an open area of land adjacent to the track bed with views across the countryside. The station building would be visible from Sutton Heath Road. The nearby Heath House would not be affected by the proposed road alignment and the old railway bridge would be retained for its existing use.

The land to the north of the existing A47 and to the east of Sutton Heath Road was purchased by the government in the 1970s as the site for the proposed Castor Township and for the upgrading of the A47. Neither of these projects happened under the Peterborough Development Corporation and, after the closure of that organisation, the land has passed through several ownerships within government and is at present owned by the Homes and Communities Agency. In the current revision of the Peterborough Local Plan, the HCA put forward this land for housing development. The western section of this development close to the A47 dualling project failed to get past the first sifting stage and the eastern section, due north of Castor village, did not get into the final plan. It is very unlikely that the western section of this land will be needed for housing in the foreseeable future. It seems very strange that Highways England is proposing to compulsorily purchase land for the A47 improvements when the government already owns land purchased for this purpose.

7 The Scheduled Monument

The Scheduled Monument is in the area known as Toll Bar Field immediately to the north of the existing A47 and to the west of the Sutton Heath Road. The official record for the monument contains little information except that it was declared in 1962 as a result of crop marks appearing on aerial photographs. The listing in the Peterborough local records describes it as a Roman settlement. Since the original listing, little investigation seems to have taken place apart from a series of walkover surveys in the 1970s. The area was ploughed, land drained and used to grow sugar beet and other crops up until 2006 since when it has been set aside or used as pasture. All surface archaeology will have been destroyed. On the surface there is nothing to see except a sloping grass field and the site is generally unknown to the local community and visitors.

Figure 6 shows the approximate area of the Scheduled Monument superimposed on an aerial photograph that shows the crop marks. It is clear that the boundaries of the monument have been drawn to match local field boundaries rather than the archaeology and perhaps the scheduled area should extend further north.



Figure 6 – The Scheduled Monument showing crop marks

In June 2017 Headland Archaeology carried out a magnetometer survey of the Scheduled Monument site and produced a report describing their findings. The main plot of the magnetometer survey is attached as Figure 7.

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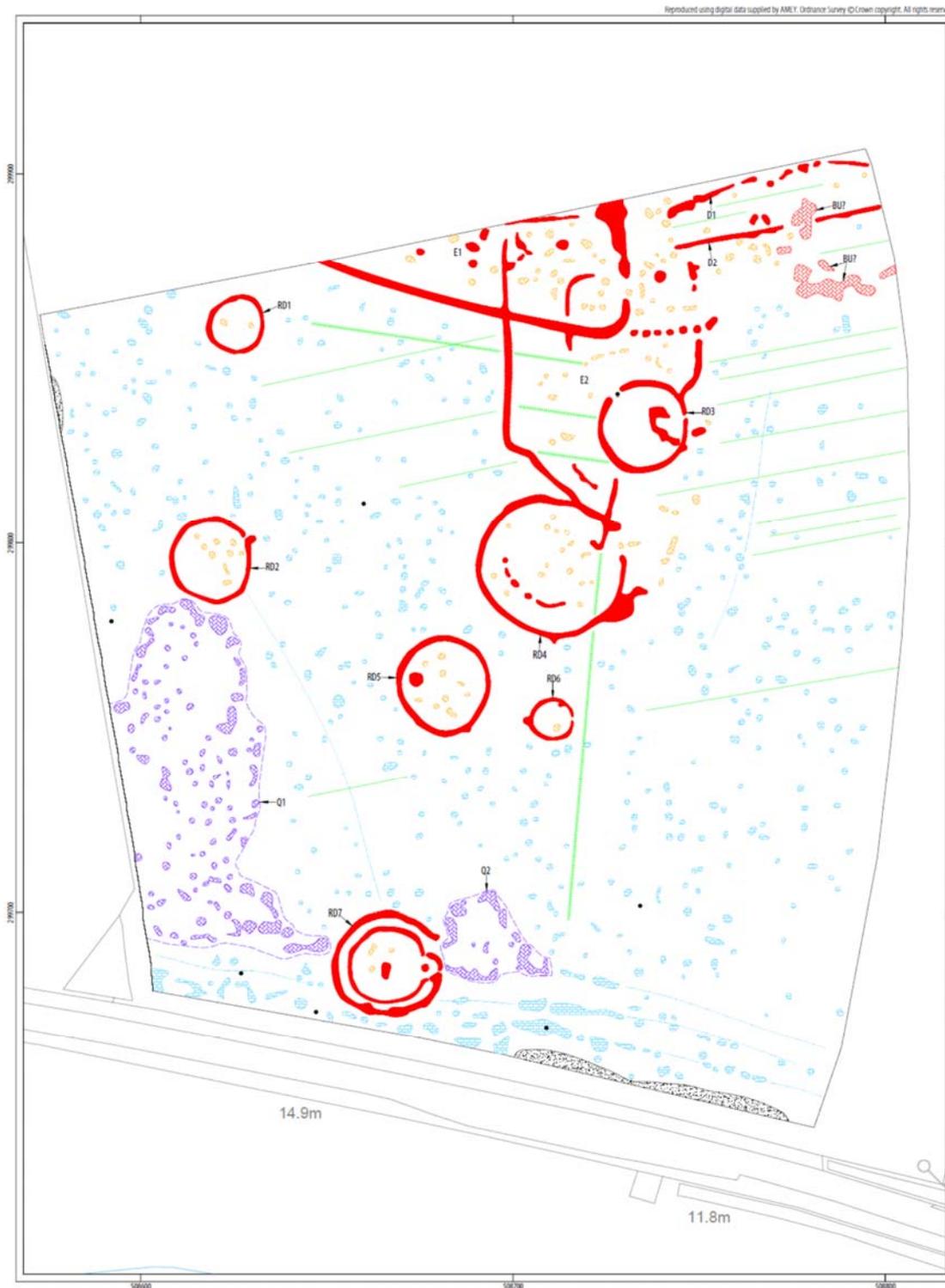


Figure 7 – The Scheduled Monument magnetometer survey by Headland Archaeology on behalf of Highways England

This survey shows a series of outlines at the northern edge of the site which are interpreted as the remains of a Roman settlement. Further south there are 7 ring shapes which are interpreted as bronze age

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barrows. On the southern edge of the site there are also two areas of quarrying which are thought to be more recent than the barrow structures. The rest of the southern area of the site is generally clear of identified targets except for modern field drains.

The ring patterns are assumed to be bronze age barrows based simply on their shape. There appears to be no other evidence to support this assumption. The southern barrow shows a different form to the others and expert opinion indicates that this may be from a different period to the other rings. It may be that the southern ring is part of a separate group closer to the river but with no survey results outside the Scheduled Monument it is impossible to confirm this. Bronze age barrows exist at numerous sites in the area and across England and Historic England's claims that these particular barrows are of national significance is not supported by any published evidence.

7.1 The Status of Scheduled Monuments

The position of a Scheduled Monument within the context of a Development Consent Order application for a national infrastructure project is governed by the *National Policy Statement for National Networks (NPSNN)* (Dept. of Transport, December 2014)

This document states that that projects doing substantial damage to a Scheduled Monument will only be approved in exceptional circumstances. This essentially sets up two tests, whether the damage is substantial and whether the circumstances are exceptional.

In this case there is no doubt that avoiding the Scheduled Monument will do permanent and irreversible damage to the Nene valley and risks destroying other unrecorded archaeological assets. Whether that is an exceptional circumstance is debatable.

The other question is whether it is possible to build the new road across the Scheduled Monument without doing substantial damage. This is examined in the next section.

7.2 Crossing the Scheduled Monument

There are four main options for crossing the Scheduled Monument which are discussed below.

7.2.1 Crossing the Scheduled Monument to the North of the Southern Barrow

The Headland report shows a gap of 45m between the southern barrow and the next feature to the north. The proposed dual carriageway requires a 25m wide corridor including verges and fence lines. The Headland magnetometer survey shows no targets in this area that the road would traverse so it would appear that there is no damage to any known archaeology. This approach would separate the southern barrow from the others but there is some indication that it is from a different period historically and not necessarily linked to the other barrows. If it is proved that there are further archaeological remains between the A47 and the river, this approach would group the south barrow with them which may be correct for the context of this barrow. This route is illustrated in Figure 8. Before this route could be adopted there is a need to investigate in detail the proposed road route through the Scheduled Monument. There are a number of ways of doing this either by trenching or by more sophisticated non-intrusive methods.

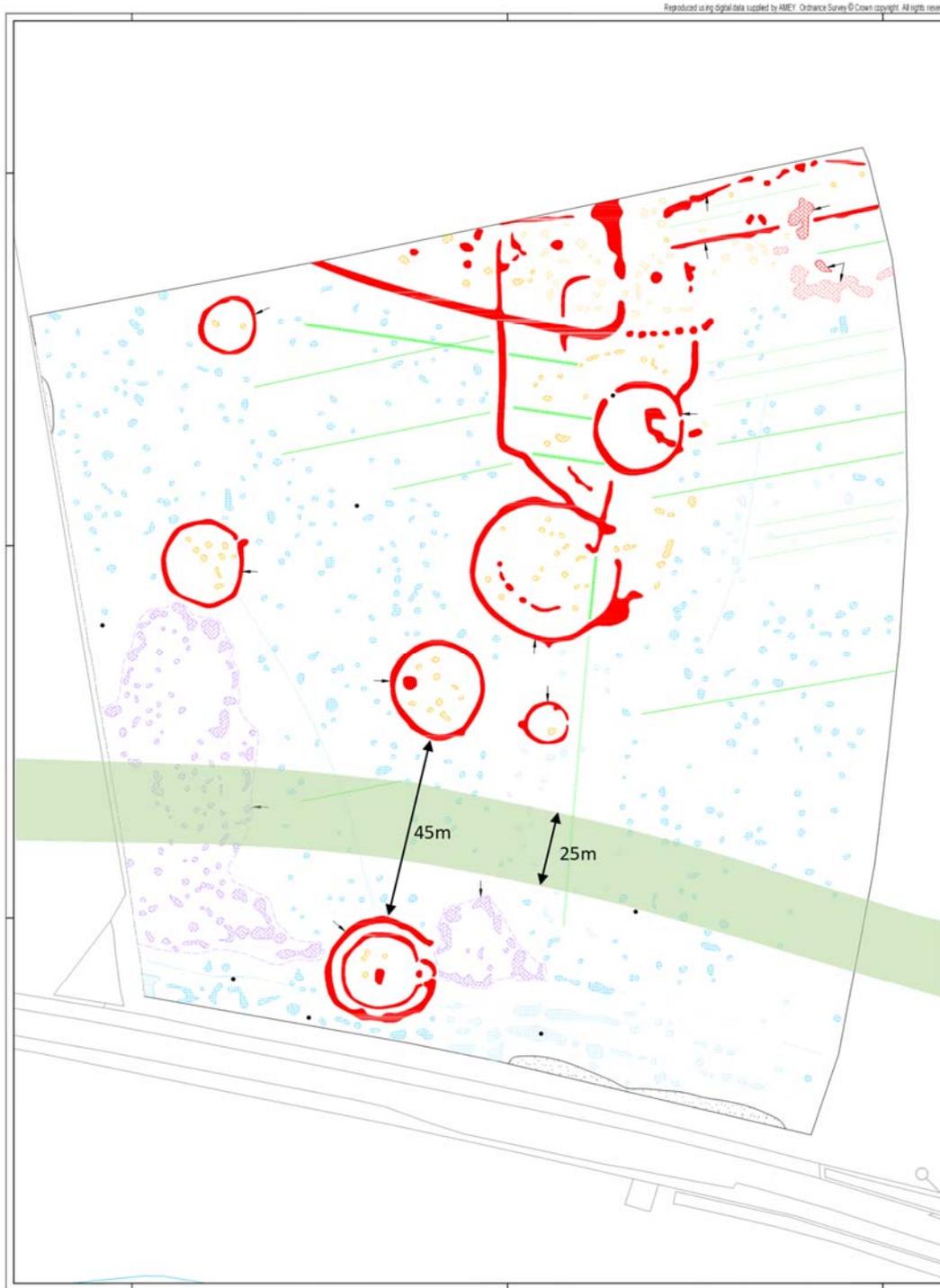


Figure 8 – Crossing the Scheduled Monument to the north of the south barrow

7.2.2 Through the Southern Barrow

If the Scheduled Monument did not exist, the logical route for the road would run along the southern edge of the Scheduled Monument through the southern barrow. For this option to be followed, it would be necessary to fully excavate the barrow using the latest techniques. If there are significant finds these could either be displayed locally, in a custom built visitor centre, or in the Peterborough museum. The

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£6 million difference in cost between this and the southern route would allow significant expenditure on the excavations and display. Excavating this barrow would leave the rest of the site completely untouched and considerably increase the understanding of the rest of the monument for both professional archaeologists and the public. This option is shown in Figure 9.

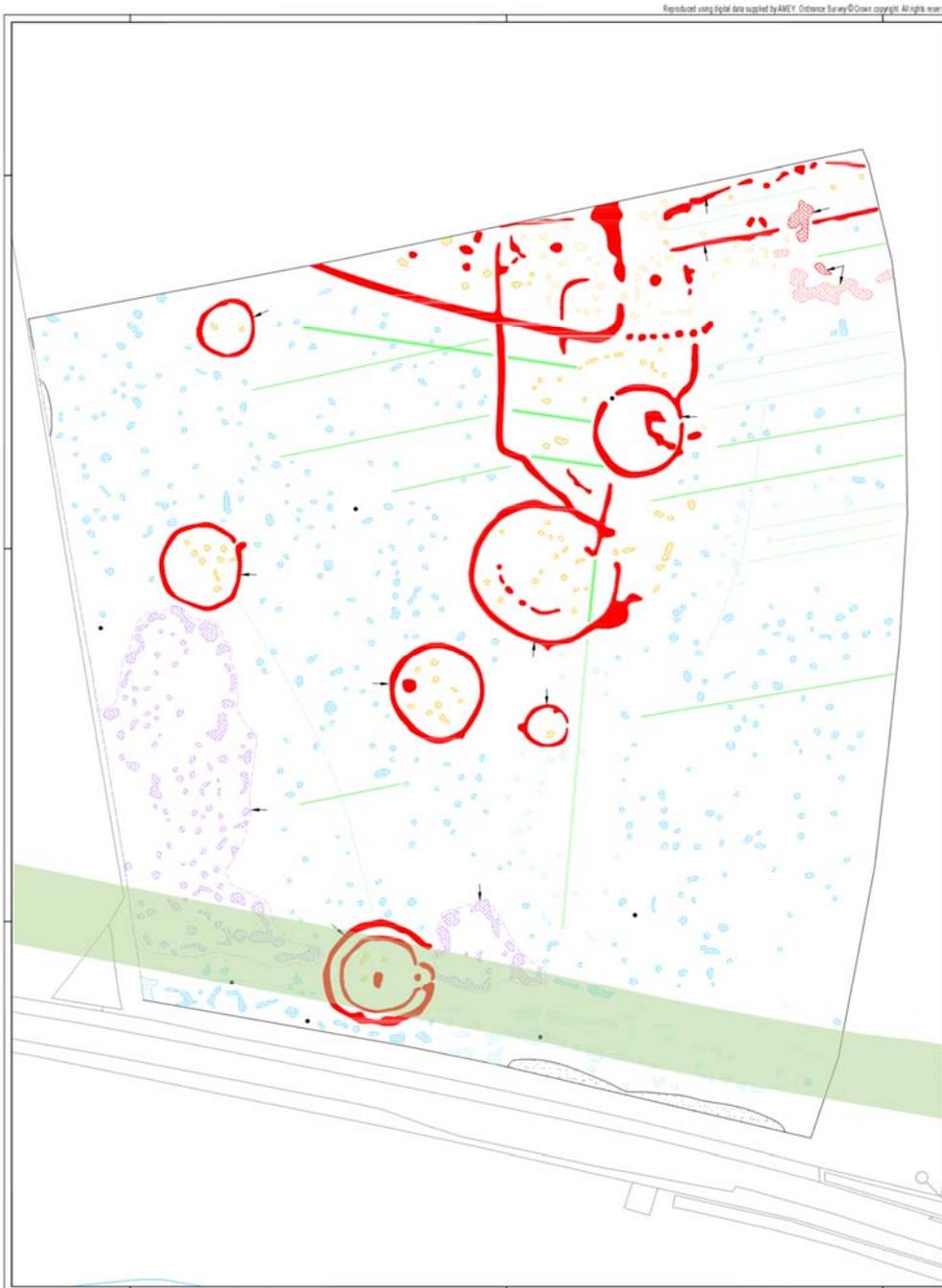


Figure 9 – The A47 Routed over the Southern Barrow

7.2.3 Bridging over the Southern Barrow

The southern barrow has a diameter of 27m according to the Headland report. It would be possible to bridge across this area, leaving the barrow completely untouched. Although such a bridge is expensive,

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it would still leave the northern route considerably lower in price than the southern option. This solution has been used at other locations. The plan layout for this is the same as in Figure 9.

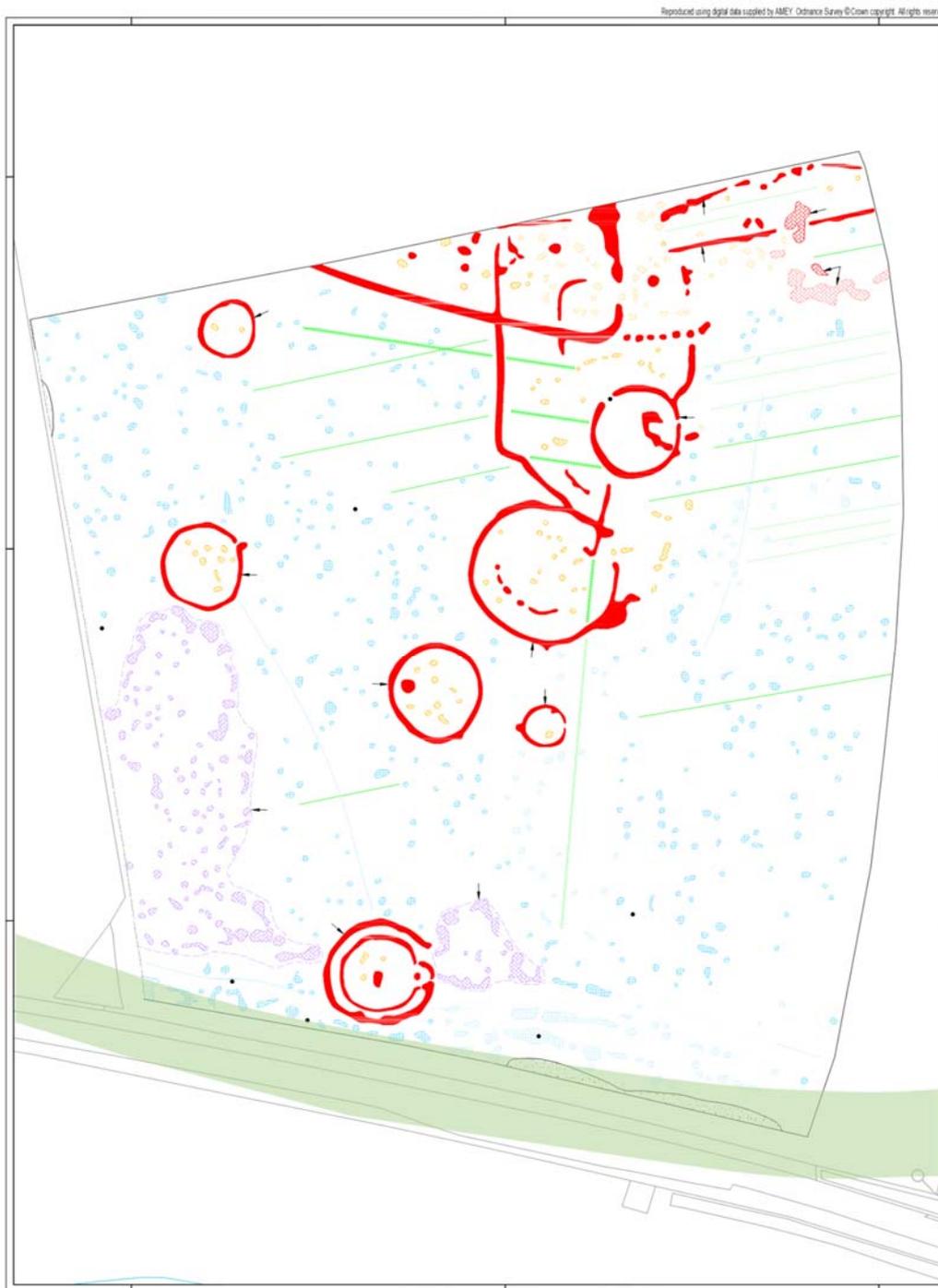


Figure 10 – Passing to the south of the barrows

7.2.4 Passing Through the Southern Corners of the Scheduled Monument

The fourth option would be to build the road across the south west corner of the Scheduled Monument, passing approximately 10m south of the southern barrow and then re-entering the area and cutting across the south east corner. This leaves all the barrows intact. The only areas of the Scheduled Monument

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being covered are those which have been quarried in more recent times. This option, whilst enabling the northern route to be adopted to the east of the monument, fails to overcome concerns about the impact on the Nene Valley and the difficulty of providing a continuous parallel cycling/walking/horse riding route. It is shown in figure 10,

7.2.5 Passing Close to the Southern Boundary of the Scheduled Monument

This option is similar to that shown in Figure 10 except with the road moved south to avoid impinging on the actual footprint of the Scheduled Monument. This pushes the new road further into the river valley, with all the complications described above, but would still allow the use of the northern alignment east of the Scheduled Monument.

8 Conclusions

It is clear that the use of the northern route for the A47 Wansford to Sutton Dualling saves a great deal of money when compared with the southern route and avoids the permanent destruction of the ecology and landscape of the Nene valley. It also avoids substantial geotechnical risks in the construction of the road.

Using the northern route will impact the Scheduled Monument but it seems possible to build the road without touching any of the features for which the site is listed. This does not appear to represent substantial damage to the site.

The issue is where the balance between these options lies. In the view of the two parish councils and the local residents, a northern route minimizing impacts on the Scheduled Monument is the preferred option.

To take this forward, the section of the Scheduled Monument in the proposed road alignment should be investigated in more detail to check that nothing of significance will be damaged. These investigations should be undertaken by Highways England to unlock a potential saving of approximately £6 million on the project cost.