

A47 Wansford to Sutton Dualling

Scheme Number: TR010039

Volume 6 **6.6 EIA Scoping Opinion**

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Forms and Procedure) Regulations 2009

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The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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6.6 SCOPING OPINION

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SCOPING OPINION:

Proposed A47 Wansford to Sutton

Case Reference: TR010039

Adopted by the Planning Inspectorate (on behalf of the
Secretary of State for Communities and Local Government)
pursuant to Regulation 10 of The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017

March 2018

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1. INTRODUCTION

1.1 Background

- 1.1.1 On 06 February 2018, the Planning Inspectorate (the Inspectorate) on behalf of the Secretary of State (SoS) received a scoping request from Highways England (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed A47 Wansford to Sutton project (the Proposed Development).
- 1.1.2 In accordance with Regulation 10 of the EIA Regulations, an Applicant may ask the SoS to state in writing its opinion '*as to the scope, and level of detail, of the information to be provided in the environmental statement*'.
- 1.1.3 This document is the Scoping Opinion (the Opinion) provided by the Inspectorate on behalf of the SoS in respect of the Proposed Development. It is made on the basis of the information provided in the Applicant's report entitled 'A47 Wansford to Sutton EIA Scoping Report' (the Scoping Report). This Opinion can only reflect the proposals as currently described by the Applicant. The Scoping Opinion should be read in conjunction with the Applicant's Scoping Report.
- 1.1.4 The Applicant has notified the SoS under Regulation 8(1)(b) of the EIA Regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development. Therefore, in accordance with Regulation 6(2)(a) of the EIA Regulations, the Proposed Development is EIA development.
- 1.1.5 Regulation 10(9) of the EIA Regulations requires that before adopting a scoping opinion the Inspectorate must take into account:
- (a) *any information provided about the proposed development;*
 - (b) *the specific characteristics of the development;*
 - (c) *the likely significant effects of the development on the environment;*
and
 - (d) *in the case of a subsequent application, the environmental statement submitted with the original application.*
- 1.1.6 This Opinion has taken into account the requirements of the EIA Regulations as well as current best practice towards preparation of an ES.
- 1.1.7 The Inspectorate has consulted on the Applicant's Scoping Report and the responses received from the consultation bodies have been taken into account in adopting this Opinion (see Appendix 2).
- 1.1.8 The points addressed by the Applicant in the Scoping Report have been carefully considered and use has been made of professional judgement and experience in order to adopt this Opinion. It should be noted that

when it comes to consider the ES, the Inspectorate will take account of relevant legislation and guidelines. The Inspectorate will not be precluded from requiring additional information if it is considered necessary in connection with the ES submitted with the application for a Development Consent Order (DCO).

- 1.1.9 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (eg on submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.
- 1.1.10 Regulation 10(3) of the EIA Regulations states that a request for a scoping opinion must include:
- (a) a plan sufficient to identify the land;*
 - (b) a description of the proposed development, including its location and technical capacity;*
 - (c) an explanation of the likely significant effects of the development on the environment; and*
 - (d) such other information or representations as the person making the request may wish to provide or make.*
- 1.1.11 The Inspectorate considers that this has been provided in the Applicant's Scoping Report. The Inspectorate is satisfied that the Scoping Report encompasses the relevant aspects identified in the EIA Regulations.
- 1.1.12 In accordance with Regulation 14(3)(a), where a scoping opinion has been issued in accordance with Regulation 10 an ES accompanying an application for an order granting development consent should be 'based on *the most recent scoping opinion adopted (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion)*'.
- 1.1.13 The Inspectorate notes the potential need to carry out an assessment under The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations). This assessment must be co-ordinated with the EIA.

1.2 The Planning Inspectorate's Consultation

- 1.2.1 In accordance with Regulation 10(6) of the EIA Regulations the Inspectorate has consulted the consultation bodies before adopting a scoping opinion. A list of the consultation bodies formally consulted by the Inspectorate is provided at Appendix 1. The consultation bodies have been notified under Regulation 11(1)(a) of the duty imposed on them by Regulation 11(3) of the EIA Regulations to make information available to

the Applicant relevant to the preparation of the ES. The Applicant should note that whilst the list can inform their consultation, it should not be relied upon for that purpose.

- 1.2.2 The list of respondents who replied within the statutory timeframe and whose comments have been taken into account in the preparation of this Opinion is provided, along with copies of their comments, at Appendix 2, to which the Applicant should refer in undertaking the EIA.
- 1.2.3 The ES submitted by the Applicant should demonstrate consideration of the points raised by the consultation bodies. It is recommended that a table is provided in the ES summarising the scoping responses from the consultation bodies and how they are, or are not, addressed in the ES.
- 1.2.4 Any consultation responses received after the statutory deadline for receipt of comments will not be taken into account within this Opinion. Late responses will be forwarded to the Applicant and will be made available on the Inspectorate's website. The Applicant should also give due consideration to those comments in carrying out the EIA.

1.3 Article 50 of the Treaty on European Union

- 1.3.1 On 23 June 2016, the United Kingdom (UK) held a referendum and voted to leave the European Union (EU). On 29 March 2017 the Prime Minister triggered Article 50 of the Treaty on European Union, which commenced a two year period of negotiations regarding the UK's exit from the EU. There is no immediate change to legislation or policy affecting national infrastructure. Relevant EU Directives have been transposed into UK law and those are unchanged until amended by Parliament.

2. THE PROPOSED DEVELOPMENT

2.1 Introduction

- 2.1.1 The following is a summary of the information on the Proposed Development and its site and surroundings prepared by the Applicant and included in their Scoping Report. The information has not been verified and it has been assumed that the information provided reflects the existing knowledge of the Proposed Development and the potential receptors/resources.

2.2 Description of the Proposed Development

- 2.2.1 The Applicant's description of the Proposed Development and its location is provided in Scoping Report Sections 2.3 and 2.4. The Proposed Development comprises the construction of a new 2.5km dual-carriageway in Cambridgeshire, between Wansford and Sutton. It would be constructed mainly off-line, on the north side of the existing A47 just east of an existing filling station where it would cross to the south side of the A47. At the western end of the Proposed Development, near Wansford, a new slip road is proposed to improve traffic flow between the A1 southbound carriageway and the A47 eastbound carriageway. At the eastern end, the Applicant proposes to enlarge the Sutton Roundabout (to accommodate the dual carriageway).
- 2.2.2 The proposed application site is located 9km to the west of Peterborough. It is an existing single-carriageway section of the A47 connecting the A1 in the west (near the town of Wansford) to the dual-carriageway section of the A47 just north of the village of Sutton. It lies mainly within the jurisdiction of Peterborough City Council (PCC), but the site boundary is bound to the south by the River Nene which is also the border with Huntingdon District Council (HDC). A site location plan is provided at Figure A.1 (Appendix A) of the Scoping Report.
- 2.2.3 The area surrounding the Proposed Development is predominately rural, with arable farmland interspersed and small areas of woodland, farms and residential settlements.

2.3 The Planning Inspectorate's Comments

Description of the Proposed Development

- 2.3.1 Section 2.4 of the Scoping Report provides a very brief description of the main components of the Proposed Development. Figure 1.1 of the Scoping Report provides an indication of the dualling element of the Proposed Development; however, it is not sufficiently detailed to indicate the junction improvement works and does not clearly distinguish the existing roads and other features referenced in the text. The Scoping Report lacks detail and this does inhibit the ability of the Inspectorate to form a comprehensive understanding of the Proposed Development.

- 2.3.2 Paragraph 2.4.6 states that the existing A47 will be retained between the existing priority junction with Sutton Heath Road and Sutton Roundabout. However no explanation is provided about the remaining stretch of the existing road. Section 2.4 also omits to specify the anticipated overall footprint for the Proposed Development site (in hectares). Similarly, the description of development does not distinguish between land required for construction and that required for permanent land-take.
- 2.3.3 The length of the scheme (in km) and the size of the application site (in hectares) should be specified in the ES. The ES should clearly identify the land that is required, including land required temporarily during construction (including, for example, the location of construction compounds and access routes), and the land that would be required permanently for the operational phase. The DCO application site boundary must include the land-take associated with all works and elements proposed as part of the application, including requisite demolition works, drainage features, and mitigation land.
- 2.3.4 Construction of the Proposed Development is anticipated to last for approximately 16 months. The ES should set out any anticipated phased approach to construction, the likely activities, the anticipated duration and location of construction activities and any temporary laydown areas. Construction traffic routing should be described (with reference to an accompanying plan), along with anticipated numbers/types of vehicle movements, with sufficient detail to enable a robust assessment in the ES. A draft/outline Construction Traffic Management Plan should be agreed with relevant consultees and provided with the DCO application.
- 2.3.5 The Scoping Report provides a very brief description of the location of the Proposed Development. The Inspectorate would expect a section in the ES which summarises the site and surroundings, and a location plan, to provide the context of the Proposed Development. The ES should provide a detailed description of the existing land uses and features across the land to which the proposed DCO application relates and the surrounding area.

Alternatives

- 2.3.6 The Scoping Report (Section 3) includes a description of the alternative route alignments that were considered and consulted upon. The Inspectorates notes that this section of the Scoping Report provides only limited reasons in support of the chosen option.
- 2.3.7 The EIA Regulations require that the Applicant provide 'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects'.

Flexibility

- 2.3.8 The Applicant's attention is drawn to the Inspectorate's Advice Note Nine 'Using the 'Rochdale Envelope'¹, which provides additional details on the recommended approach.
- 2.3.9 The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different developments. The development parameters will need to be clearly defined in the draft DCO (dDCO) and in the accompanying ES. These should include the dimensions of structures and permanent earthworks such as, for example, embankments (taking account of existing ground levels).
- 2.3.10 It is a matter for the Applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations. Where flexibility is sought for any elements of the Proposed Development the ES should set out the parameters that would apply, clearly setting out any proposed limits of deviation.
- 2.3.11 It should be noted that if the Proposed Development changes materially during the EIA process and prior to submission of the DCO application the Applicant may wish to consider requesting a new scoping opinion.

¹ Advice Note nine: Using the Rochdale Envelope. 2012. Available at:
<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

3. EIA APPROACH

3.1 Introduction

- 3.1.1 This section contains the Inspectorate's specific comments on the scope and level of detail of information to be provided in the Applicant's ES. General advice on the presentation of an ES is provided in the Inspectorate's Advice Note Seven 'Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements'² and associated appendices.
- 3.1.2 Aspects/matters are not scoped out unless specifically addressed and justified by the Applicant, and confirmed as being scoped out by the Inspectorate. The ES should be based on the Scoping Opinion in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report. The Inspectorate has set out in this Opinion where it has/has not agreed to scope out certain aspects/matters on the basis of the information available at this time. The Inspectorate is content that this should not prevent the Applicant from subsequently agreeing with the relevant consultees to scope such aspects/matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 3.1.3 Where relevant, the ES should provide reference to how the delivery of measures proposed to prevent/minimise adverse effects is secured through DCO requirements (or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.

3.2 Relevant National Policy Statements (NPSs)

- 3.2.1 Sector-specific NPSs are produced by the relevant Government Departments and set out national policy for NSIPs. They provide the framework within which the Examining Authority (ExA) will make their recommendation to the SoS and include the Government's objectives for the development of NSIPs. The NPSs may include environmental requirements for NSIPs, which Applicants should address within their ES.
- 3.2.2 The designated NPS relevant to the Proposed Development is the National Policy Statement for National Networks (NPSNN).

² Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements and annex. Available from: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

3.3 Scope of Assessment

General

- 3.3.1 The Inspectorate recommends that in order to assist the decision-making process, the Applicant uses tables:
- to demonstrate how the assessment has taken account of this Opinion;
 - to identify and collate the residual effects after mitigation for each of the aspect chapters, including the relevant interrelationships and cumulative effects;
 - to set out the proposed mitigation and/or monitoring measures including cross-reference to the means of securing such measures (eg a dDCO requirement);
 - to describe any remedial measures that are identified as being necessary following monitoring; and
 - to identify where details are contained in the Habitats Regulations Assessment (HRA report) (where relevant), such as descriptions of European sites and their locations, together with any mitigation or compensation measures, are to be found in the ES.
- 3.3.2 The information provided in the Scoping Report contains contradictory/conflicting information within a number of the aspect chapters. The Inspectorate expects the information contained in the ES to be free from such error and provide a clear and consistent understanding of the likely significant effects associated with the Proposed Development.
- 3.3.3 Not all of the features/relevant receptors identified in the aspect chapters of the Scoping Report are shown on the environmental constraints plans contained in Appendix B. The Inspectorate expects all features/relevant receptors considered in the aspect assessments to be clearly identified on figures accompanying the ES.
- 3.3.4 The Inspectorate considers that where a DCO application includes works described as 'associated development', that could themselves be defined as an improvement of a highway, the Applicant should ensure that the ES accompanying that application distinguishes between; effects that primarily derive from the integral works which form the proposed (or part of the proposed) NSIP and those that primarily derive from the works described as associated development, for example through a suitably compiled summary table. This will have the benefit of giving greater confidence to the Inspectorate that what is proposed is not in fact an additional NSIP defined in accordance with s22 of the PA2008.
- 3.3.5 It is noted that paragraph 1.1.3 of the Scoping Report states that a 'final version' of the Scoping Report will be appended to the ES. The Inspectorate does not understand the purpose of this. The ES submitted with the DCO application must be based on the most recent scoping

opinion adopted (Regulation 14(3) of the EIA Regulations). There is no requirement for the Scoping Report to be submitted with the DCO application, however, should the Applicant wish to include it, the Scoping Report must be the version on which the most recent scoping opinion is based.

- 3.3.6 The Inspectorate understands that traffic modelling will be used to assess the likely effects of the Proposed Development. The ES should clearly explain the relationship between traffic and transport modelling and figures used in the ES. The results of the traffic modelling will directly influence other aspect-based assessments including but not limited to noise and air quality. Therefore, the ES should also identify if there are limitations to the modelling which could affect other aspects in the ES.
- 3.3.7 While the structure of the ES remains for the Applicant to decide, the information that would be expected to appear in a Transport Assessment (TA) should be provided in the ES. The Inspectorate notes that a TA is not included in the draft structure of the ES presented in the Scoping Report. The Inspectorate considers that the ES must clearly explain how the information gathered as part of the TA (including traffic modelling and baseline transport information) has informed other assessments within the ES such as, for example, air quality, noise and vibration, and people and communities.
- 3.3.8 The ES should assess the impacts from proposed construction traffic management measures including any road closures or diversions. Royal Mail Group Limited has provided comments in this regard along with information on their operations in the area which could have a bearing on this assessment, to which the Applicant should have regard.
- 3.3.9 Throughout the Scoping Report, reference is made variously to 'the Proposed Scheme', 'the project', 'the site footprint', 'the construction footprint', 'the construction site', 'the red line boundary', and 'the scheme area'. Some of these terms appear to be used interchangeably. This is of particular relevance to understanding the study areas applied and how the relevant baseline information has been captured, and therefore understanding the basis of the assessments of the effects of the Proposed Development. The terminology used in the ES should be clearly explained and consistently applied throughout so that the likely significant effects of the Proposed Development can be fully understood.

Baseline Scenario

- 3.3.10 The ES should include a description of the baseline scenario with and without implementation of the Proposed Development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.

Forecasting methods or evidence

- 3.3.11 The ES should contain the timescales upon which the surveys which underpin the technical assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES (with confirmation that these timescales apply to all chapters), or in each aspect chapter.
- 3.3.12 The Inspectorate expects the ES to include a chapter setting out the overarching methodology for the assessment, which clearly states which effects are 'significant' and 'non-significant' for the purposes of the EIA Regulations. It is noted that descriptions of the levels of significance used are provided in Table 1.1 of the Scoping Report, under 'Approach to Assessment', and that the subsequent table (referenced as Table 1.2 but also titled Table 1.1) combines receptor sensitivity and impact magnitude values to determine the level of significance of an effect. However, the criteria used to define sensitivity and magnitude values have not been provided. The Inspectorate expects these criteria to be described in the ES in the overarching methodology chapter or in individual aspect chapters where there is any departure from that.
- 3.3.13 The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

Residues and emissions

- 3.3.14 The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments.
- 3.3.15 The Inspectorate notes that heat and radiation effects have been scoped out for assessment on the basis that they are unlikely to arise due to the nature of the Proposed Development. The Inspectorate agrees that significant heat and radiation effects are unlikely and that this matter may be scoped out of the ES.

Mitigation

- 3.3.16 The Inspectorate notes that the Applicant states in a number of chapters that mitigation measures will be set out in the application CEMP. Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES, and the likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured, with cross-reference made to specific DCO requirements or other legally binding agreements submitted with the DCO application.

Vulnerability of the development to risks of major accidents and/or disasters

- 3.3.17 The ES should include a description of the potential vulnerability of the Proposed Development to risks of major accidents and/or disasters, including vulnerability to climate change, which are relevant to the Proposed Development. Relevant information available and obtained through risk assessments pursuant to European Union legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.
- 3.3.18 It is stated in Section 1.8 of the Scoping Report that the Applicant proposes to scope out the need for a standalone assessment of the likely significant effects resulting from major accidents or disasters. This is on the basis that specific accidents or disasters which have the potential to cause harm to the environment (including flooding, mine collapse and spillages of contaminants) can be sufficiently addressed in the scheme design and relevant ES technical chapters. The Inspectorate notes from the scoping consultation response from the Health and Safety Executive (contained in Appendix 2 of this Scoping Opinion) that there is a major accident hazard pipeline with the site boundary and another within the 500m site buffer area.
- 3.3.19 Having had regard to the particular nature of the Proposed Development and the justification provided in the Scoping Report, the Inspectorate agrees that the Proposed Development is unlikely to require a standalone assessment regarding the Proposed Development's vulnerability to risks of, or its potential to cause, major accidents and/or disasters, on the basis that this will be covered in the technical chapters. This should include consideration of the major accident hazard pipelines. The Inspectorate notes and welcomes the Applicant's statement that the ES will include a summary table which identifies where this has been considered in the relevant technical chapters, such as, for example, road drainage and the water environment in respect of flood risk and culvert design. The Applicant should liaise with the relevant statutory consultees to better understand the likelihood of an occurrence and the Proposed Development's susceptibility to potential major accidents and disasters.

Transboundary effects

- 3.3.20 Schedule 4 Part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The Inspectorate notes that the Applicant has indicated in the Scoping Report whether the Proposed Development is likely to have significant impacts on another European Economic Area (EEA) State.

- 3.3.21 Regulation 32 of the EIA Regulations inter alia requires the Inspectorate to publicise a DCO application on behalf of the SoS if it is of the view that the proposal is likely to have significant effects on the environment of another EEA State, and where relevant, to consult with the EEA state affected. The Inspectorate considers that where Regulation 32 applies, this is likely to have implications for the examination of a DCO application.

A reference list

- 3.3.22 A reference list detailing the sources used for the descriptions and assessments must be included in the ES.

3.4 Confidential Information

- 3.4.1 In some circumstances it will be appropriate for information to be kept confidential. In particular, this may relate to information about the presence and locations of rare or sensitive species such as badgers, rare birds and plants where disturbance, damage, persecution or commercial exploitation may result from publication of the information. Where documents are intended to remain confidential the Applicant should provide these as separate paper and electronic documents with their confidential nature clearly indicated in the title, and watermarked as such on each page. The information should not be incorporated within other documents that are intended for publication or which the Inspectorate would be required to disclose under the Environmental Information Regulations 2014.

4. ASPECT BASED SCOPING TABLES

4.1 Air Quality

(Scoping Report Section 5)

The local air quality (AQ) assessment study area is described as encompassing human health receptors and ecologically designated sites within 200m of roads that are expected to be affected by the Proposed Development, which are defined according to DMRB criteria.

The regional AQ assessment study area is not defined. It is stated that the assessment will measure the change in emissions resulting from the Proposed Development, and that the 'affected roads' considered in the assessment will include those that meet the following criteria: where there would be a change of more than 10% Annual Average Daily Traffic (AADT); a change of more than 10% to the number of Heavy Duty Vehicles (HDVs); or a change in the daily average speed of more than 20km/hr.

It is explained that no further details of the areas which meet the above criteria have been provided as traffic data for the Proposed Development is not yet available.

The nearest AQMA is approximately 14.5km east of the Proposed Development.

The air quality assessment will be carried out in accordance with the DMRB Volume 11, Section 3, Part 1 (HA 207/07) and related HE Interim Advice Note (IANs), and Defra's Local Air Quality Management Technical Guidance (LAQM.TG(16)).

A 'simple' assessment (according to the DMRB) is proposed for the operational phase of the Proposed Development. It is not stated whether a simple or 'detailed' assessment will be undertaken for the construction phase.

The Applicant considers that the main risks to sensitive receptors during the construction phase would include on-site dust emissions arising from construction activities and vehicle movements, but that significant effects are unlikely with mitigation measures in place.

The Applicant identifies potential operational air quality effects resulting from changes in emissions associated with changes in traffic flows on the local road network, and changes in road layout which may bring road traffic emission sources closer to, or further away from, sensitive receptors, and notes that these effects will be dependent on traffic impacts yet to be determined.

No matters have been proposed to be scoped out of the assessment.

ID	Para/ Section	Other points	Inspectorate's comments
1	5.2.1 & 5.2.2	Study area	The Inspectorate acknowledges that information necessary to depict the study area eg the traffic data was not available at the time that the scoping request was

			submitted. However the study areas should be clearly described in the ES and delineated on plans to aid the reader.
2	Section 5.2	Receptors	The receptors that will be considered in the assessment are not identified in the aspect chapter and Figures B.1 and B.2 do not include, for example, any PRoW or locally designated features, so it is unclear whether this is because there are none in the study area or whether they have been omitted. Although references are made to 'sensitive receptors' in the area, such as, for example, in relation to determining the worst case pollutant concentration at diffusion tube monitoring locations, these receptors are not identified. Figures B.1 and B.2 appear to be general environmental constraints plans. The Inspectorate recommends that plans are provided with the ES that specifically identify the receptors relevant to air quality.
3	Section 5.3	Baseline diffusion tube monitoring	It is noted that the scheme-specific diffusion tube monitoring undertaken by HE was carried out over a 6-month period from January to June 2016. Baseline surveys undertaken for the ES should be in accordance with the most relevant Defra guidance relating to diffusion tube monitoring.
4	5.3.10	European Union (EU) Air Quality Directive compliance	It is stated that the Proposed Development is unlikely to cause non-compliance with the EU Air Quality Directive on the basis that the closest Defra Pollution Climate Mapping (PCM) link is located approximately 5.5km away and had a reported annual NO ₂ concentration in 2017 of 38µg/m ³ , which is below the annual mean limit value of 40µg/m ³ . Such a conclusion will need to be fully justified in the ES and include information on the contribution of the Proposed Development to area NO ₂ concentrations. In addition, although no reference is made in this chapter to potential cumulative effects it is acknowledged in Chapter 15 that there is potential for cumulative air quality impacts from the Proposed Development, and this

			should also be considered in the context of compliance with the Directive.
5	5.7.1	Construction effects	It is noted that the main impacts on sensitive receptors during construction are anticipated as arising from on-site dust emissions from construction activities and vehicle movements. The assessment should also address potential off-site construction impacts, such as, for example, from construction traffic on local roads.
6	5.7.2	Mitigation	The Inspectorate notes that it is anticipated that construction impacts would be mitigated through measures included within a Construction Environmental Management Plan (CEMP). No reference is made to mitigation of operational impacts, or to potential residual effects. The potential impacts during all phases of the Proposed Development and the mitigation measures proposed to address them should be described in the ES and clear cross-reference made to their location within other application documents such as, for example, the CEMP, and to where they are secured in the dDCO. Any residual effects should be identified.
7	5.7.6	Operational effects	The Inspectorate notes that the Applicant does not intend to undertake an assessment of any potential pollutants other than those identified in Section 5.7, such as potential impacts resulting from increased fine particulate matter (PM _{2.5}) emissions generated by the Proposed Development. The Inspectorate considers that the ES should include an assessment of PM _{2.5} emissions, and that in determining significance the assessment should take into account performance against relevant target/limit values.
8	5.8.1 & 5.8.2	Levels of assessment	The intended approach to the assessment of air quality impacts is unclear. It is stated that only a qualitative assessment of construction phase effects will be undertaken, and that a simple assessment (according to the DMRB) will be undertaken for the operational phase. Table 16.1 (Chapter 16) indicates that a simple

			assessment will be undertaken in respect of air quality, however Table 16.2 indicates that a simple assessment will be used for the construction phase regional impacts and a detailed assessment for the construction phase local impacts. The approach to each assessment should be fully explained and justified within the ES and agreed with PCC and HDC.
9	5.9.3	Operational phase assessment	Although NO _x and carbon dioxide (CO ₂) are identified in Section 5.7 as key pollutants for consideration in the operational phase assessment, it is indicated that only NO ₂ and PM ₁₀ will be included in the simple assessment. The Inspectorate considers that NO _x and CO ₂ emissions should be included in the assessment.
10	5.9.3 & 5.9.5	Ecological receptors	It is noted that only designated sites are referenced in relation to the determination of significant effects. The Applicant should additionally consider and assess as appropriate non-designated sites and species that could be significantly affected by the Proposed Development. The Inspectorate recommends that the relevant ecological receptors to be included in the assessment are agreed with Natural England (NE), PCC and HDC. The assessment should be informed by the ecological assessments and cross-reference made to relevant information contained in the ES biodiversity chapter.
11	Section 5.9	Methodology	The approach to determining at which receptors there is '...a reasonable risk of exceeding an air quality threshold...' should be clearly explained in the ES. The approach that will be applied to determining a significant effect is unclear. The Scoping Report only defines the magnitude criteria and sensitivity criteria. Table 5.7 of the Scoping Report refers only to 'properties', and no reference is made to ecological receptors. It is unclear what would constitute a significant effect. Information on the methodological approach applied to the assessments must be clearly set out in the ES and encompass

			impacts on both human and ecological receptors.
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4.2 Cultural Heritage

(Scoping Report Section 6)

The study area is described as being a zone 1km from the Proposed Development. In addition, a 'Zone of Visual Influence' (ZVI) generated as part of the landscape and visual impact assessment (LVIA) will be used to identify designated assets beyond 1km which may be affected. Designated and non-designated heritage assets are presented in Table 6.1 of the Scoping Report.

The Scoping Report makes reference to desk study data being obtained from Historic England and local authority records. The assessment would follow various guidance documents and standards including the DMRB HA 208/07³, Historic England guidance on the historic environment and the setting of heritage assets⁴, and 'Standard and Guidance from the Chartered Institute for Archaeologists' (no further reference provided). A detailed level of assessment is proposed.

The Scoping Report identifies potential adverse effects arising from the construction of the Proposed Development on the settings of designated buildings, one non-designated building (to be demolished), and buried archaeological deposits. Potential effects during operation on the setting of designated heritage assets are also identified.

No matters have been proposed to be scoped out of the assessment.

ID	Para	Other points	Inspectorate's comments
12	6.2.1	Study area	The ES should provide a robust justification as to why the 1km study area is appropriate and sufficient to capture all heritage assets which could experience impacts on their setting – taking into account for example, visual intrusion or increased noise emissions. To support this justification, the Applicant is advised to refer to the Zone of Theoretical Visibility (ZTV) developed for the LVIA and the conclusions of the noise impact assessment. Paragraph 6.2.2 states that a ZVI (assumed to refer to the ZTV) will be used to identify any assets that would be affected by the construction of the

³ DMRB Volume 11, Section 3, Part 2 'Cultural Heritage' (HA 208/07)

⁴ Historic England (2008) conservation Principles: Policies and Guidance; Historic England (2015) Historic Environment Good Practice Advice in Planning Note 2 (GPA2) – Managing Significance in Decision-taking in the Historic Environment; Historic England (2015) Historic Environment Good Practice Advice in Planning Note 3 (GPA3) – The Setting of Heritage Assets.

			Proposed Development. The ZTV should also be used to identify assets affected by its operation. The Applicant should seek agreement with relevant consultees regarding the appropriate study area.
13	Table 6.1	Baseline	The Applicant's attention is drawn to a third 'Building of Local Importance' adjacent to the Proposed Development, Sutton Bridge No 6-A47, which should be taken into account in the assessment, in addition to those identified in Table 6.1 of the Scoping Report.
14	6.5.1	Guidance	The Inspectorate notes the potential for impacts on buried archaeological resources. The Applicant should set out in the ES which of the Chartered Institute for Archaeologists' standards and guidance have been used to inform the assessment. In addition to the guidance listed in the Scoping Report the assessment should take into account guidance contained in Historic England's guidance document 'Preserving Archaeological Remains'⁵. The Applicant should be aware that Historic England's 'Good Practice Advice Note 3' was revised in December 2017, and should ensure that the versions of the guidance relied on for the purposes of the assessment are current.
15	6.8.1 – 6.9.6	Proposed methodology	The Scoping Report states that a detailed assessment will be undertaken. However the description of a detailed assessment in DMRB HA208/07 includes a number of options, which are not mentioned in the Scoping Report, and consequently the proposed scope of the assessment is unclear. The ES should include both a desk-based assessment and an archaeological field

⁵ Preserving Archaeological Remains: Decision taking for sites under development (Historic England, 2016)

			evaluation. Consultation with PCC, HDC and Historic England is recommended.
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4.3 Landscape

(Scoping Report Section 7)

The study area is described in the Scoping Report as 1km from the Proposed Development site boundary, extended to encompass any receptors beyond that which have the potential to experience significant effects. The assessment will follow the DMRB Part 5 on Landscape Effects⁶ in addition to guidance for a detailed assessment in IAN 135/10⁷, the Guidelines for Landscape and Visual Impact Assessment (GLVIA)⁸, and NE guidance on landscape character assessments⁹. A detailed level of assessment is proposed. The Scoping Report identifies potentially significant adverse effects on landscape character and visual amenity during both the construction and operational phases. Mitigation planting is relied on to reduce impacts in the longer term. No matters have been proposed to be scoped out.			
ID	Para	Other points	Inspectorate's comments
16	7.2.1	Study area	The Inspectorate advises that the study areas for the landscape assessment and the visual assessment need to be justified and efforts made to agree these with the relevant consultees. The ES should explain how such consultation influenced the approach taken to the assessment.
17	7.9.3	Methodology - Zone of Theoretical Visibility (ZTV)	The Scoping Report states that the ZTV will be established assuming a viewer height of 1.6m above ground level. However, the Inspectorate notes that DMRB recommends that the observer height is 1.8m above ground level. The ES should clearly explain the approach taken to the assessment and any assumptions made or deviation from recognised guidance should be identified and justified.
18	7.7.1 – 7.7.8	Potential effects	To support a robust assessment of likely significant effects, the Proposed Development should be illustrated using plans and visualisations in the ES which

⁶ DMRB Volume 11, Section 3, Part 5 Landscape Effects

⁷ IAN 135/10 Landscape and Visual Effects Assessment

⁸ GLVIA, 3rd Edition: Landscape Institute of Environmental Management and Assessment (2013)

⁹ Natural England (2014) An Approach to Landscape Character Assessments

			highlight the elements of the Proposed Development which would impact on landscape character and be visually prominent to visual and amenity receptors (for example the new dual carriageway, access roads, roundabouts and embankments). Cross sections and photomontages should be included for this purpose.
19	7.7.3 & 7.7.4	Mitigation	Mitigation planting and landscape mitigation are proposed in order to mitigate the operational effects of the development. The ES should include a tree and hedge survey and a plan and schedule of what is proposed to be retained and removed. In relation to planting, the Applicant should discuss and attempt to agree the planting specification/species mix with the relevant local planning authorities. The Applicant should also seek to agree an appropriate aftercare period for the proposed landscaping. It should be clear how the proposed landscaping would mitigate the impacts on landscape and visual receptors, and how these impacts would change as the proposed planting matures. Interactions with other ES aspects, for example beneficial impacts on local ecology, should be explained and assessed.

4.4 Biodiversity

(Scoping Report Section 8)

Table 8.1 of the Scoping Report sets out the study areas applied to assess the potential effects on various ecological receptors. The study areas vary in spatial extent depending on the nature of the receptor. They include study areas of 2km for European sites (except SACs designated for bat populations, where 30km is applied) and nationally and locally designated sites.

Baseline conditions were identified using a combination of desk study and field survey, including an Extended Phase 1 Habitat Survey of publicly accessible land. Phase 2 surveys have also been carried out for some species and are currently ongoing. The Applicant intends to rely on DMRB Volume 11, Section 3, Part 4, Ecology and Nature Conservation guidance, IAN 130/10¹⁰, and CIEEM guidance¹¹ to assess the potential for significant adverse effects that may arise from the Proposed Development.

The Scoping Report identifies potential effects during construction and operation in Section 8.7, which include:

- loss and fragmentation of habitats;
- changes in hydrology and pollution of habitats; and
- disturbance from noise, vibration, and light.

No matters have been proposed to be scoped out of the assessment.

ID	Para / Section	Points	Inspectorate's comments
20	Table 8.1	Study area	No explanation is provided for the study areas selected. In addition, it is unclear to what the 10km study area for "Statutory sites designated for their bird interest" refers, as a 2km study area is identified for SPAs, and for Ramsar sites, NNRs and SSSIs (which could be designated for their ornithological features). The study areas applied must be clearly described, justified and defined according to the extent of the likely impacts.
21	Table 8.2 & Section	Baseline – designated sites	Natural England, in their consultation response, note that the Proposed

¹⁰ HA (2010) IAN 130/10 Ecology and Nature Conservation: Criteria for Impact Assessment

¹¹ Chartered Institute of Ecology and Environmental Management (CIEEM) (2016) Guidelines for Ecological Impact Assessment in the UK

	8.3		Development falls within the Nene Valley Nature Improvement Area. The Inspectorate agrees that the ecological assessment should take into account impacts from the Proposed Development and the implications for the objectives of the Nature Improvement Area. Note that the River Wensum SAC and SSSI is located in Norfolk, not 1.6km north-east of the Proposed Scheme, as indicated in the Scoping Report.
22	Section 8.3	Baseline - figures	Not all of the ecological features identified in the Scoping Report, such as, for example, County and Local Wildlife Sites, are shown on the environmental constraints plans contained in Appendix B of the Scoping Report. The Inspectorate expects all features considered in the assessment to be included on the figures submitted with the ES.
23	Table 8.3	Location of breeding bird surveys	Table 8.3 states that breeding bird surveys will be carried out 'within the footprint of the Proposed Scheme, plus a 100m buffer'. However, the Inspectorate notes that barn owl populations within 1.5km of road boundaries are at risk of collision mortality. If barn owls are likely to be present within a 1.5km study area then the assessment should include consideration of impacts to this species. The Applicant should liaise with Natural England to ensure the assessment appropriately addresses the collision risk to barn owls.
24	8.4.2	Field surveys - Access	The Scoping Report states that ecological surveys undertaken to date were confined to locations where landowner permission was obtained. The Applicant should ensure that the ES is accompanied by an appropriate and comprehensive set of ecological surveys sufficient to inform the assessment of likely significant effects.
25	8.6.2	Consultation	The Inspectorate notes that Sutton Parish Council, in their scoping consultation response (contained in Appendix 2 of this Scoping Opinion), have questioned the Applicant's findings in relation to bats. The Applicant should ensure that the

			information provided in the ES is sufficient to support their assessment of potential effects.
26	8.8.5 & 8.8.12 vs 8.8.14	Field surveys - aquatic invertebrates & reptiles	Contradictory information is provided in the Scoping Report on the timing of the surveys proposed for aquatic invertebrates and reptiles. The Applicant should ensure that surveys are undertaken at an appropriate time (and any limitations explained, as above) and accurately reported in the ES.
27	8.7.1 – 8.7.9	Potential effects	The Scoping Report does not identify mortality/injury of protected and/or priority species as a potential impact arising from the construction and operation of the project. The Inspectorate considers that this should be assessed in the ES, for both the construction and operational phases of the development.
28	8.7.1 – 8.7.9	Potential mitigation measures	The Inspectorate recommends that effort is made to agree any proposed mitigation and monitoring measures with relevant consultees including Natural England and the local planning authorities. The ES should detail all proposed mitigation measures and demonstrate how they will be secured.
29	8.8.27 vs 8.10.1	Level of assessment	The Scoping Report contradicts itself, proposing further assessment to a simple level in paragraph 8.8.27, and to a detailed level in the concluding paragraph. The Inspectorate considers further detailed level assessment is required.

4.5 Geology and Soils

(Scoping Report Section 9)

The study area is described as being 'initially' an area within 100m of the Proposed Development for the purpose of identifying the 'baseline geo-environmental conditions' that may be extended depending upon the results of the ground investigations.

A simple level assessment will be undertaken utilising guidance from the DMRB Volume 11 Section 3 Part 11. The assessment criteria used to determine the sensitivity of receptors, magnitude of impact, and significance of effects is set out in Tables 9.3, 9.4 and 9.5, respectively.

The Applicant considers that no potentially significant effects are anticipated to occur during the construction and operational phases of the Proposed Development.

No matters have been proposed to be scoped out of the assessment. The Scoping Report proposes to include an assessment of impacts to agricultural land within aspect Chapter 12 of the ES titled People and Communities.

ID	Para / Section	Other points	Inspectorate's comments
30	N/A	Relevant receptors - soil	The Scoping Report omits reference to a soil assessment. The Inspectorate considers that the study area should be identified and an assessment of the potential impacts the Proposed Development may have on soils should be included in the ES.
31	Section 9.2	Study area	The Scoping Report states that the study area is 'initially within a 100m radius of the Proposed Development' and may 'increase depending on results of scheduled ground investigations' which will be used to establish the baseline conditions for the assessment. The extent of the proposed study area is not clear from this description. In addition, the Applicant has not identified the study area for the groundwater assessment. Within the ES the respective study areas should be clearly defined and justified, and be sufficient to address the anticipated extent of potential impacts.
32	Section 9.3	Existing and baseline knowledge	The Scoping Report refers to a Preliminary Sources Study Report (PSSR) throughout

			but has not included the PSSR or an accessible reference to the report. If the PSSR is necessary to support the assessment of likely significant effects, it should be appended to the ES or be referenced and readily accessible.
33	9.3.2 and Table 9.1	Baseline data	Table 9.1 of the Scoping Report uses chainages to located and identify where changes in superficial deposits along the route occur. No chainage sections or plans are provided within the Scoping Report. The ES should clearly describe the locations where changes in superficial deposits occur and make reference to clearly labelled plans as necessary.
34	9.4.3 & 9.4.8	Assumptions and limitations	The Scoping Report states that 'baseline conditions from site walkovers have been assumed to be accurate' but also that 'no site walkover was conducted'. Therefore the extent of the surveys undertaken to date is ambiguous. The ES should clearly describe the surveys that have been undertaken to inform the assessment. The surveys should be sufficient to ensure all relevant impacts have been identified and assessed where likely significant effects may occur. The Scoping Report states that 'it has been assumed that the Proposed Schemes will not disturb any areas of significantly contaminated ground'. The ES should clearly identify and justify any assumptions made.
35	9.6.1	Consultation	The Applicant should consult with the relevant local authority regarding the extent of known contaminated land based on available data. The Applicant should ensure that any data relied upon for the assessment, and the findings, are clearly presented within the ES.
36	Section 9.6	Consultation	The Inspectorate has been made aware that National Grid has a high voltage power line and a high pressure gas transmission line within the Proposed Development site. The Applicant should ensure that any works or interactions with these assets that may

			result in likely significant effects are assessed in the ES.
37	Section 9.7	Monitoring and mitigation measures	The Inspectorate notes that no reference has been made within the Scoping Report to any potential requirement for mitigation or monitoring measures. If mitigation and/or monitoring are required this should be described in the ES.
38	Section 9.7	Potential effects	The Inspectorate notes that potential impacts on the Sutton Heath and Bog SSSI, which is located 50m from the Proposed Development, are not considered. The ES should include an assessment of the impacts to the SSSI if significant effects are likely to occur.
39	9.7.1	Potential effects	The Scoping Report does not reference impacts from construction to soil, hydrology, hydrogeology and groundwater. The ES should assess impacts during construction to these features where significant effects are likely to occur.

4.6 Materials

(Scoping Report Section 10)

The Scoping Report explains that a study area has not been identified for this aspect on the basis that there is currently no relevant guidance available and therefore, it will be 'determined through professional judgement by the influence of the Proposed Scheme, rather than through a set geographical location'.

A simple level assessment will be undertaken utilising guidance from the DMRB Volume 11 Section 2 Part 4. No assessment criteria have been provided.

Potential impacts identified include depleting available resources, increasing emissions from the transport of materials and waste, potential contamination from hazardous waste, and reducing waste infrastructure capacities.

The Inspectorate has provided comments below on matters that the Applicant proposes to scope out of the ES.

ID	Para / Section	Applicant's proposed matters to scope out	Inspectorate's comments
40	10.8.3	Operational effects	The Applicant has provided limited justification to support the approach that no significant effects to materials will occur during operation. However, having regard to the nature of the Proposed Development and its characteristics the Inspectorate agrees that this matter can be scoped out.
ID	Para	Other points	Inspectorate's comments
41	10.2.1 - 10.2.2	Study area	The Scoping Report has not defined the study area but states that it will be determined by 'the influence of the Proposed Scheme'. No information is provided on the methodology that will be applied to determine this. The Applicant should ensure that the study area is clearly defined and justified within the ES and encompasses the anticipated extent of potential impacts.
42	10.3	Future baseline	An assessment should be made and reported in the ES of the future baseline following construction.
43	10.3.3	Existing baseline	The ES should identify the location, capacity and existing waste infrastructure receptors in order to comprehensively

			assess the impacts that generation of waste during construction may have on the environment.
44	10.3.4	Existing baseline	The Inspectorate notes that baseline information on waste generation and waste management facilities will be obtained from local planning authorities in Norfolk. The Inspectorate understands that the Proposed Development is also located partly in Cambridgeshire, and therefore recommends that information should also be obtained from Cambridgeshire County Council where relevant.
45	Section 10.5	Methodology	The Materials aspect chapter methodology should be set out in the ES in accordance with the methods recommended in the Highways Agency's Interim Advice Note (IAN) 153/11.
46	10.9.2	Waste impacts	The Scoping Report states that specific quantities of materials and waste generated by the Proposed Development will be estimated at a later stage as its design progresses. The ES should include an estimation of the quantity of construction materials required and waste arising. The packaging from construction materials should be included within the estimate of waste arising.
47	10.9.3	Methodology	The Inspectorate notes that 'professional judgement will be used to provide an assessment of effects' but makes no reference to how this would be applied. The use of professional judgement should be described in the ES.

4.7 Noise and Vibration

(Scoping Report Section 11)

The study area for both the construction and operational phases is identified as the area within 1km of the physical works associated with the Proposed Development. It is noted that it may be extended to assess the impacts from construction traffic on the existing road network and from potential diversion routes, and during operation to assess potential impacts on sensitive receptors outside the 1km study area which are adjacent to roads where the change in road traffic noise would increase or decrease by at least 1dB $L_{A10,18hr}$ on opening, or 3dB $L_{A10,18hr}$ in the long term (not defined).

The Applicant proposes to undertake a 'detailed' assessment (according to the DMRB) for both the construction and the operational phases of the Proposed Development.

The Scoping Report identifies the potential impacts anticipated during construction which will alter the noise and vibration baseline for sensitive receptors for a temporary period and the potential impacts identified during operation resulting from changes to traffic flows and road alignment which will change noise at noise-sensitive receptors, including 'Noise Impact Areas' (NIAs).

No matters have been proposed to be scoped out of the assessment.

ID	Para/ Section	Other point	Inspectorate's comments
48	11.2.2 & 11.9.9	Temporal scope	The Scoping Report does not define either the 'long-term' or the 'future assessment year'. The temporal scope of the assessment must be clearly described in the ES.
49	11.3.2 & 11.3.4	Survey data	The Scoping Report refers to results of 'previous assessments', although no other information is provided in respect of these. Survey data which is relied upon for the purposes of the assessment must be clearly referenced and be accessible or appended to the ES, as necessary.
50	11.3.5	Receptors	The Scoping Report identifies two noise-sensitive areas (NSAs) but only Sutton Heath Road is specifically named. The ES should include figures to support the textual description and that clearly identify the location of the relevant noise and vibration receptors for the assessment.
51	11.3.6	Receptors	Table 11.1 of the Scoping Report does not include hospitals, non-designated sites, or

			species, in the list of typical sensitive noise and vibration receptors. Impacts on such receptors should be assessed if it is considered that any could be significantly affected by the Proposed Development.
52	11.3.8	Methodology	The Inspectorate notes that the Scoping Report states that surveys undertaken will be 'broadly in accordance' with 'The Calculation of Road Traffic Noise' (CRTN) methodology (HMSO, 1988). The methodological approach should be clearly set out in the ES and any departure from the standard guidance should be explained and justified.
53	11.4.1	Assumptions and Limitations	The approach to the assessment set out in the Scoping Report has been provided in the absence of relevant information on potential noise and vibration impacts eg construction traffic movements, forecast traffic flows, speeds and percentage heavy goods data. Without this information it is difficult for Inspectorate and consultees to make meaningful comment. The ES should describe and assess impacts associated with these matters with sufficient detail and certainty where significant effects are likely to occur.
54	11.7.1 & 11.10.1 11.7.2 & Figures B.1 and B.2	Terminology	The Scoping Report refers to potential impacts in the vicinity of the 'Proposed Scheme envelope'. This term is not explained or used elsewhere in the Scoping Report and it is unclear how it relates to the Proposed Development site or the study area. 'NIAs' is used in this chapter (and also in Chapter 1, paragraph 1.11.9) to refer to both 'Noise Impact Areas' and 'Noise Important Areas'. The terminology used in the ES should be applied correctly and consistently throughout in order to avoid confusion.
55	11.9.2	Methodology	The Inspectorate notes that the approach set out in BS5228-1:2009+A1:2014 (BSI, 2014) will be adopted for the construction noise assessment. In addition to identifying the title of the guidance on which the

			Applicant intends to rely, the methodology should be described in the ES.
56	11.9.5	Methodology – construction vibration	The approach to determining the level of effect that would constitute a significant effect in respect of construction vibration must be clearly explained and justified in the ES.
57	Section 11.9	Methodology	The Scoping Report does not provide criteria for determining the sensitivity of receptors. This should be set out in the ES. The rationale for deciding what constitutes the 'Lowest Observed Adverse Effect Level' (LOAEL) and the 'Significant Observed Adverse Effect Level' (SOAEL) has not been provided. The LOAEL and SOAEL used for the purposes of the assessment should be agreed with PCC and HDD, and justified in the ES.

4.8 People and Communities

(Scoping Report Section 12)

A Local Impact Area (LIA) comprising a 250m area from the scheme boundary is proposed for the assessment of impacts on non-motorised users; amenity; motorised travellers driver stress; community severance; community land and community facilities; demolition of private property and associated land take; development land; and agricultural land and businesses. A wider area comprising the Unitary Authority area of Peterborough is proposed for the assessment of effects on the local economy.

The assessment methodology will follow IAN 125/15 and DMRB Volume 11 Section 3 to consider the impacts of the Proposed Development on people and communities. It will combine the Non-Motorised User and Community Effects components of DMRB Part 8 and Part 9 for impacts on Vehicular Travellers, and DMRB Part 6 for Land Use impacts.

The Scoping Report identifies potential effects on non-motorised users owing to the impacts on footpaths and cycle paths, amenity, driver stress for motorised users, community severance, and land and property including demolition and land-take.

No matters have been proposed to be scoped out of the assessment.

ID	Para	Other points	Inspectorate's comments
58	12.2.1-12.2.4	Study area	The ES should include a clear justification in support of the study areas especially given that they are in part based on professional judgement. The ES should also ensure that the study areas used are clearly depicted on corresponding figures to aid understanding. The Inspectorate notes that DMRB Volume 11, Section 3, Part 8, paragraph 2.2 states that community facilities "and their catchment areas" should be addressed by the assessment. The ES should clearly explain how this requirement has been taken into account in the selection of appropriate study areas.
59	Table 12.1	Baseline – Public Rights of Way (PRoW)	The Scoping Report states that surveys undertaken in February 2017 revealed low usage of PRoW. The Inspectorate considers that further surveys should be undertaken at including at other times of the year as usage could vary according to the season.
60	Table	Baseline – community	No baseline information is presented for community severance. The ES must include

	12.1	severance	a description of the baseline conditions against which the Proposed Development is assessed. The baseline conditions should be informed by relevant local information, including information provided by Sutton Parish Council relating to use of the Wansford picnic area and pedestrian and cyclist usage.
61	12.3.3	Baseline – local economy	The baseline information to inform the assessment on local economy uses an index of deprivation alone. The Inspectorate considers that data on local levels of employment should also be used to inform the assessment.
62	12.7.1-12.7.16	Construction impacts	Adverse impacts from construction (eg from community severance, land-take, etc) have been identified as temporary. The ES should explain the duration of impacts and what constitutes a temporary impact for the purposes of the assessment.
63	12.9.3 & 12.9.28	Methodology – view from the road	The Scoping Report states that in the assessment of views from the road, “consideration will not be given to the existing conditions experienced by motorised travellers or construction stage effects, as DMRB considers only impacts for the new road”. The Inspectorate does not agree and requires that the ES must consider the baseline conditions and assess the impacts of the Proposed Development against this baseline for all phases of development (including construction) where it is considered that significant effects are likely to occur.

4.9 Road Drainage and the Water Environment

(Scoping Report Section 13)

The study area is described as encompassing a number of water features within a 1km area around the Proposed Development, which will extend where there are features that may be affected by pollutants transported downstream.

The Applicant has utilised the DMRB Volume 11 Section 3 Part 10, and had regard to other guidance, including the National Planning Policy Framework.

Tables 13.3, 13.4 and 13.5 set out the criteria for determining the value of receptors, magnitude of impact and significance of effects, respectively.

The potential impacts identified during the construction and operational phases of the Proposed Development include adversely affecting the quality of the water environment due to contaminated surface run off and spillages impacting surface water and groundwater, and increased flood risk during operation due to reduced floodplain storage in conjunction with increase surface runoff.

No matters have been proposed to be scoped out of the assessment.

ID	Para	Other points	Inspectorate's comments
64	13.2.1	Study Area	The Scoping Report states that 'a number of water features within a 1km area' are included within the study area. No explanation or justification is provided in support of the 1km study area. Anglian Water note in their scoping consultation response (contained in Appendix 2 of this Opinion) that there are existing water mains within the site boundary. The Inspectorate considers that potential impacts on this infrastructure should be assessed in the ES where significant effects are likely. The study area used should be clearly defined and justified in the ES.
65	13.2.1	Study Area	The Inspectorate notes that the Scoping Report fails to state the study area to be used for the assessment of groundwater impacts. The ES should include a relevant study area for the assessment of groundwater impacts.
66	13.5.3	Legislation	Reference is made to implementing the requirements of 'The Town and Country Planning (Environmental Impact

			Assessment) Regulations 2017'. The Applicant should take care to ensure that the EIA accords with the 2017 Infrastructure Planning EIA Regulations, and that the correct legislation is reflected in the ES.
67	13.7	Mitigation	The Scoping Report refers to 'appropriate mitigation' and states that 'mitigation measures will be set out in the CEMP'. Required mitigation measures must be described in the ES and an assessment of their efficacy included. The ES should cross-refer confirming where and how mitigation relied upon in the assessment is secured.
68	13.7.1 and 13.7.14	Potential impacts	The Inspectorate notes that the Sacrewell Farm overbridge would require demolition and that 'significant embankment construction' would be required. An assessment of the environmental impacts that may occur from these works should be included within the ES.
69	13.7.7	Potential impacts	The extent of any works required to the public sewerage system is unclear. Noting that the potential for water pollution and flooding impacts is identified in the Scoping Report, the Applicant is advised to consult Anglian Water at the earliest opportunity in relation to works that may be needed during the construction and/or operational phases of the Proposed Development.
70	13.8.2	Aquatic ecology	The Applicant may wish to consider whether it would be more appropriate for the assessment of aquatic ecology to be undertaken within the Biodiversity aspect chapter rather than this aspect chapter.

4.10 Climate

(Scoping Report Section 14)

The study area for this aspect assessment is not identified.

The assessment will consider both the effects of the Proposed Development on climate, and the vulnerability of the Proposed Development to climate change.

Greenhouse gases and carbon dioxide emissions during construction and operation will be predicted using the 'Mott MacDonald Carbon Portal', and compared to baseline, regional (if available) and UK emissions predictions. A qualitative assessment of the vulnerability to climate change is proposed according to DMRB Volume 11 Section 2 Part 5, and Highways England Major Projects' Instructions 'Environmental Impact Assessment: Implementing the Requirements of 2011/92/EU as amended by 2014/52/EU (EIA Directive)'.

Potential impacts during construction are identified as being those from embodied carbon emissions from construction material, and from greenhouse gas emissions arising from the use of plant and transport of materials. Potential impacts during operation are identified as an increase in local CO₂ emissions due to changes in traffic flow and speed limits.

Potential impacts on the Proposed Development from climate change are identified as deterioration of the road surface as a result of a temperature increase, and precipitation changes affecting the foundation strength of the road surface, potentially leading to an increased flood risk.

No matters have been proposed to be scoped out of the assessment.

ID	Para / Section	Points	Inspectorate's comments
71	Section 14.2	Study area	The extent of the study area for this aspect assessment is not included in the Scoping report. It must be described and justified in the ES.
72	1.1.1 (below 14.2.2)	Inter-relationships with other aspects	The Inspectorate notes that the Applicant considers that there may be inter-relationships between this and other aspects that are assessed elsewhere in the ES. The ES should describe the nature of the inter-relationships and clearly cross-refer relevant information contained in other aspect chapters.
73	14.3.1	Baseline information	The Scoping Report refers to 'Peterborough County Council greenhouse gas emissions', and references a footnote which may provide an explanation but is missing. The Applicant should ensure that all information relevant to the assessment of likely

			significant effects is provided in the ES.
74	14.3.8	UKCP09 projections	As set out in the NPSNN, the Applicant's assessment of likely significant effects should take into account the potential impacts of climate change using the latest UK climate projections. This should include the anticipated UKCP18 projections where appropriate.
75	Section 14.7	Mitigation	The Inspectorate notes that mitigation intended to address the effects during construction of the Proposed Development on and its vulnerability to climate change would be contained in a CEMP. The ES should identify the potential impacts and the specific mitigation measures required providing a clear cross-reference to information contained in the CEMP (where relevant) and explaining how and where such measures are secured.
76	14.9.6	Methodology	The Inspectorate notes that the Applicant intends to use the 'Mott MacDonald Carbon Portal' to predict the CO ₂ and greenhouse gases emissions of the Proposed Development. The methodology applied to the assessment should be clearly set out in the ES and include details of the model used to inform the assessment and how it relates to relevant national policy, guidance and standards.
77	Section 14.9	Methodology	It is not explained in the Scoping Report how the significance of effects resulting from the Proposed Development will be determined and what would constitute a significant effect. This should be included in the ES within the description of the methodology section.

4.11 Combined and Cumulative Effects

(Scoping Report Section 15)

The combined effects assessment study area is not yet determined. The cumulative effects assessment (CEA) study area is defined as a 2km Zone of Influence (ZOI) around the boundary of the Proposed Scheme for both construction and operation.

The assessment will apply the methodology set out in DMRB Volume 11 Section 2 Part 5 'Assessment and Management of Environmental Effects', and take account of the advice contained in Planning Inspectorate's 'Advice Note Seventeen: Cumulative Effects Assessment'.

The Scoping Report identifies potential combined and cumulative impacts on all receptors during construction, and cumulative impacts on habitats, protected species, agricultural land, noise and air quality during operation.

No matters have been proposed to be scoped out of the assessment.

ID	Para / Section	Points	Inspectorate's comments
78	15.2.2	Study area	The rationale for selecting a 2km ZOI for the CEA is unclear, as it is indicated under 'Assumptions and Limitations' that the other developments to be included in the CEA have not yet been identified. The Applicant should ensure that the study area is sufficient to encompass all developments that together with the Proposed Development could generate significant cumulative effects, and must justify the approach in the ES. Effort should be made to agree the study area with relevant consultees including PCC and HDC.
79	15.3.2 & 15.6.1	Baseline information	The Applicant should consult relevant consultees including HDC and PCC in effort to agree the baseline information and the list of developments to be included in the CEA.
80	15.9.2 & 15.9.8	Mitigation	In addition to identifying the combined and cumulative residual effects following the implementation of mitigation, the ES should identify the potential effects prior to mitigation and the measures proposed to address them. Mitigation measures relied upon in the ES should be identified and cross-reference should be made to information confirming where and how

			these measures are secured.
81	15.9.10	Methodology	The significance criteria that will be used for the assessment is unclear. Reference is made to Table 15.4 of the DMRB as setting out the combined and cumulative effects significance criteria that will be applied to the assessment. However, the only table contained in the DMRB which appears relevant is Table 2.6 'Determining Significance of Cumulative Effects', and it is not clear how this relates to the information contained in Table 15.2 in the Scoping Report, titled 'Combined and Cumulative Significance Criteria', as they reflect different terminology and criteria. The criteria used for the assessment must be clearly and consistently described and applied throughout the aspect chapter.
82	Chapter 1, Table 1.1	Methodology	The description of a 'moderate' effect provided in Table 1.1 implies that only moderate effects of a Proposed Development may contribute to cumulative effects. The Applicant is reminded that effects which may not be significant alone can contribute to a significant cumulative effect together with effects of other proposed developments, and that this should be borne in mind when undertaking the cumulative effects assessment (CEA).

5. INFORMATION SOURCES

5.0.1 The Inspectorate's National Infrastructure Planning website includes links to a range of advice regarding the making of applications and environmental procedures, these include:

- Pre-application prospectus¹²
- Planning Inspectorate advice notes¹³:
 - Advice Note Three: EIA Notification and Consultation;
 - Advice Note Four: Section 52: Obtaining information about interests in land (Planning Act 2008);
 - Advice Note Five: Section 53: Rights of Entry (Planning Act 2008);
 - Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements;
 - Advice Note Nine: Using the 'Rochdale Envelope';
 - Advice Note Ten: Habitat Regulations Assessment relevant to nationally significant infrastructure projects (includes discussion of Evidence Plan process);
 - Advice Note Twelve: Transboundary Impacts
 - Advice Note Seventeen: Cumulative Effects Assessment; and
 - Advice Note Eighteen: The Water Framework Directive.

5.0.2 Applicants are also advised to review the list of information required to be submitted within an application for Development as set out in The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended).

¹² The Planning Inspectorate's pre-application services for applicants. Available from: <https://infrastructure.planninginspectorate.gov.uk/application-process/pre-application-service-for-applicants/>

¹³ The Planning Inspectorate's series of advice notes in relation to the Planning Act 2008 process. Available from: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES¹⁴

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Clinical Commissioning Group	Cambridgeshire and Peterborough Clinical Commissioning Group
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England - East of England
The relevant fire and rescue authority	Cambridgeshire Fire and Rescue Service
The relevant police and crime commissioner	Cambridgeshire Police and Crime Commissioner
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Thornhaugh Parish Council
	Sutton Parish Council
	Sibson cum Stibbington Parish council
	Wansford Parish Council
The Environment Agency	The Environment Agency - East Anglia
The Civil Aviation Authority	Civil Aviation Authority
The Relevant Highways Authority	Peterborough City Council Highway Control
The Relevant Highways Authority	Cambridgeshire County Council Highway Control

¹⁴ Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The relevant strategic highways company	Highways England - East
Relevant statutory undertakers	See Table 2 below
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	Forestry Commission - East and East Midlands
The Secretary of State for Defence	Ministry of Defence

TABLE A2: RELEVANT STATUTORY UNDERTAKERS¹⁵

STATUTORY UNDERTAKER	ORGANISATION
The relevant Clinical Commissioning Group	Cambridgeshire and Peterborough Clinical Commissioning Group
The National Health Service Commissioning Board	NHS England
The relevant NHS Trust	East of England Ambulance Service NHS Trust
Railways	Highways England Historical Railways Estate
Canal Or Inland Navigation Authorities	Inland waterways Association
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes and Communities Agency
The relevant Environment Agency	Environment Agency - East Anglia

¹⁵ 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (as amended)

STATUTORY UNDERTAKER	ORGANISATION
The relevant water and sewage undertaker	Anglian Water
The relevant public gas transporter	Cadent Gas Limited
	Energetics Gas Limited
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Quadrant Pipelines Limited
	National Grid Gas Plc
	National Grid Gas Plc
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
The relevant electricity distributor with CPO Powers	Energetics Electricity Limited
	Energy Assets Power Networks
	ESP Electricity Limited
	G2 Energy IDNO Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited

STATUTORY UNDERTAKER	ORGANISATION
	Leep Electricity Networks Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Utility Distribution Networks Limited
	Eastern Power Networks Plc
	UK Power Networks Limited
	National Grid Electricity Transmission Plc
	National Grid Electricity Transmission Plc

TABLE A3: SECTION 43 CONSULTEES (FOR THE PURPOSES OF SECTION 42(1)(B))¹⁶

LOCAL AUTHORITY¹⁷
Huntingdonshire District council
South Kesteven District Council
South Holland District Council
East Northamptonshire District Council
Fenland District Council
South Cambridgeshire District Council
East Cambridgeshire District Council

¹⁶ Sections 43 and 42(B) of the PA2008

¹⁷ As defined in Section 43(3) of the PA2008

LOCAL AUTHORITY¹⁷
Cambridgeshire County
Bedford Borough Council
Central Bedfordshire Council
Peterborough City Council
Northamptonshire County Council
Lincolnshire County
Hertfordshire County
Suffolk County
Norfolk County
Essex County

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

Consultation bodies who replied by the statutory deadline:

Anglian Water
Environment Agency
ESP Utilities Group Limited
Fenland District Council
Health and Safety Executive
Highways England
Historic England
NATS (En Route) Public Limited Company
National Grid
Natural England
Peterborough City Council
Royal Mail
South Kesteven District Council
Sutton Parish Council
Wansford Parish Council



Alison Down
EIA and Land Rights Advisor
The Planning Inspectorate
3D Eagle Wing
Temple Quay House
2 The Square
Bristol, BS1 6PN

Strategic Planning Team
Water Resources
Anglian Water Services Ltd
Thorpe Wood House,
Thorpe Wood,
Peterborough
PE3 6WT

Tel ([REDACTED])
www.anglianwater.co.uk
Our ref 00026924

Your ref TR010039-000007

2 March 2018

Dear Alison,

A47 Wansford to Sutton: Environmental Statement Scoping Report

Thank you for the opportunity to comment on the scoping report for the above project. Anglian Water is the water and sewerage undertaker for the above site. The following response is submitted on behalf of Anglian Water.

General comments

Anglian Water would welcome further discussions with Highways England prior to the submission of the Draft DCO for examination.

In particular it would be helpful if we could discuss the following issues:

- Wording of the Draft DCO including protective provisions specifically for the benefit of Anglian Water.
- Requirement for water and wastewater services.
- Impact of development on Anglian Water's assets and the need for mitigation.
- Pre-construction surveys.

13 Road Drainage and water environment

Reference is made to principal risks of flooding from the above project being ground water and surface water flooding as set out in Table 13.1 of the report.



Registered Office
Anglian Water Services Ltd
Lancaster House, Lancaster Way,
Ermine Business Park, Huntingdon,
Cambridgeshire. PE29 6YJ
Registered in England
No. 2366656.

an AWG Company

Anglian Water is responsible for managing the risks of flooding from surface water, foul water or combined water sewer systems. At this stage it is unclear whether there is a requirement for a connection(s) to the public sewerage network for the above site or as part of the construction phase. Consideration should be given to all potential sources of flooding including sewer flooding (where relevant) as part of the Environmental Statement and related Flood Risk Assessment.

Anglian Water would also wish to be consulted on the content of the proposed Flood Risk Assessment if a connection to the public sewerage network is required.

We welcome the intention to have further discussions with Anglian Water to ensure access can be maintained to our existing asset Wansford pumping station. It is important to ensure that adequate safeguards are put in place to ensure that the proposed highway improvements to the A47 do not adversely affect the continued operation of Anglian Water's existing assets or pollution of the river Nene.

In addition there existing water mains within the boundary of the site which potentially could be affected by the development. It is therefore suggested that the Environmental Statement should include reference to existing water mains as well as the Wansford pumping station.

Maps of Anglian Water's assets are available to view at the following address:

<http://www.digdat.co.uk/>

Should you have any queries relating to this response please let me know.

Yours sincerely

A black rectangular box redacting the signature of Stewart Patience.

Stewart Patience

Spatial Planning Manager

Helen Down
The Planning Inspectorate
3C Eagle
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Our ref: AN/2018/127067/01-L01
Your ref: TR010039-000007
Date: 07 March 2018

Dear Helen

Application by Highways England (the applicant) for an order granting development consent for the A47 Wansford to Sutton project (the proposed development)
A47 Wansford To Sutton Peterborough

Thank you for consulting us on the Scoping Opinion for the proposed Development Consent Order for the A47 Wansford to Sutton project, which was received on 07 February 2018.

The focus of our response is on the following environmental topics for which we are responsible:

1. Flood risk
2. Water quality
3. Land contamination
4. Environmental permitting.

Our technical comments detailing the information we consider should be included in the Environmental statement are provided on the following pages.

1. Flood Risk

The land immediately surrounding the River Nene and Wittering Brook 'Main Rivers' are located within Flood Zones 2 and 3 and are at high risk of fluvial flooding. A Flood Risk Assessment (FRA) will therefore need to be included in the Environmental Statement to demonstrate that the proposed development is safe, will not increase flood risk elsewhere and where possible, reduce flood risk overall (Paragraph 103, footnote 20 of the National Planning Policy Framework (NPPF)). In particular, the FRA will need to confirm that there will be no loss of floodplain as a result of the development. The FRA will need to provide details on any raising or lowering of land within the floodplain. Any loss of floodplain should be compensated for on a level for level, volume for volume basis (i.e. re-grade the land at the same level as that taken up by the development) therefore providing a direct replacement for the lost storage volume. Within the FRA, detailed information must be provided to demonstrate how this can be achieved.

For further advice and guidance on the provision of floodplain compensation, please refer to direct replacement of flood storage within Section A3.3.10 Compensatory Flood Storage of CIRIA Guide C624: Development and Flood Risk, guidance for the construction industry.

The majority of the land surrounding the existing A47 is located within Flood Zone 1 and is therefore at low risk of flooding. We therefore assume and recommend, that the proposed road is located in Flood Zone 1 to avoid placing the development at flood risk.

We have a river level monitoring station present between the proposed scheme and the River Nene, adjacent to Wansford Pumping Station. The FRA would need to ensure that this is not affected at any point during the works. We would welcome future discussion with the applicant on this matter.

We can provide flood data to the applicant to help support and inform the FRA. In particular, we can provide River Nene level and flow information. To do this, we ask that the applicant makes a formal enquiry to our Customers and Engagement team at LNenquiries@environment-agency.gov.uk and request a Product 3.

We would like to make you aware that The River Nene in this location is 'flashy' and levels can raise dramatically, impacting land and properties on both sides of the bank. Additionally, there is quite a slope between the current A47, (near the petrol station and picnic area), and the River Nene. We would therefore welcome discussions with the applicant as to how the development will be facilitated to ensure that flood risk is appropriately addressed.

Under the terms of the Environmental Permitting Regulations 2016, a permit or exemption may be required for any proposed works or structures, in, under, over or within 8 m of the River Nene designated a 'Main River'. Our Flood Engineers can provide advice on this and we recommend that the applicant contacts them by email at PSOWN@environment-agency.gov.uk to discuss the proposals. The team will be able to advise if a permit or exemption is required and the fee applicable. Please be aware that we have up to two months to determine the application from duly made date, therefore prompt discussions are advised.

The FRA will also need to consider the design of the surface water management network for the development. Flood risk from surface water is an important consideration for new development and the Lead Local Flood Authority (LLFA) is the body responsible for overseeing such designs. We therefore recommend that the LLFA is contacted and due consideration given to their advice.

2. Water Quality

The Water Framework Directive (WFD) status of the surface water and groundwater bodies located within the red line boundary of the proposed development must not deteriorate as a result of the development. We consider that the scope detailed within Chapter 13 of the Highways England Environmental Statement would provide the necessary information for the Environmental Statement. We would however, like the Environmental Statement to go further and consider how measures could be undertaken to improve the status of the WFD waterbodies and would welcome discussions with the applicant as to how this could be achieved.

3. Land Contamination

The NPPF (paragraph 109) states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing

development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. The site is underlain by both Principal and Secondary Aquifers (permeable strata capable of supporting water supplies and/or river base flow at local and strategic scales) and is therefore of high environmental sensitivity with regard to the water environment and particularly at risk from pollution. The site has been in use as an existing roadway. We are satisfied that this use does not pose a significant polluting potential to the water environment and do not therefore have any comments to make in relation to land contamination in the Environmental Statement.

Chapter 9 of the Highways England Environmental Statement concludes that a ground investigation will be carried out to establish baseline information for the proposed scheme area and will form part of the Environmental Statement. The Local Authority can provide advice on generic aspects of land contamination management. We recommend that, where planning controls are considered necessary, these should seek to integrate any requirements for human health protection with those for protection of the water environment.

4. Environmental Permitting

Flood Risk Activity Permit

Under the terms of the Environmental Permitting Regulations 2016, a permit or exemption may be required for any proposed works or structures, in, under, over or within 8 m of the River Nene designated a 'Main River'. Our Flood Engineers can provide advice on this and we recommend that the applicant contacts them by email at PSOWN@environment-agency.gov.uk to discuss the proposals. The team will be able to advise if a permit or exemption is required and the fee applicable. Please be aware that we have up to two months to determine the application from duly made date, therefore prompt discussions are advised.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours faithfully

Jennifer Moffatt
Sustainable Places Planning Adviser

Direct dial [REDACTED]

Direct e-mail [REDACTED]



Awarded to the Environment, Planning and Engagement Department,

From: [ESP Utilities Group Ltd](#)
To: [A47 Wansford to Sutton](#)
Subject: Your Reference: TR010039-000007. Our Reference: PE134366. Plant Not Affected Notice from ES Pipelines
Date: 08 February 2018 12:06:06

A47 Wansford to Sutton
The Planning Inspectorate

8 February 2018

Reference: TR010039-000007

Dear Sir/Madam,

Thank you for your recent plant enquiry at (TR010039-000007).

I can confirm that ESP Gas Group Ltd has no gas or electricity apparatus in the vicinity of this site address and will not be affected by your proposed works.

ESP are continually laying new gas and electricity networks and this notification is valid for 90 days from the date of this letter. If your proposed works start after this period of time, please re-submit your enquiry.

Important Notice

Please be advised that any enquiries for ESP Connections Ltd, formerly known as British Gas Connections Ltd, should be sent directly to us at the address shown above or alternatively you can email us at: PlantResponses@espipelines.com

Yours faithfully,

Alan Slee
Operations Manager



Bluebird House
Mole Business Park
Leatherhead
KT22 7BA



<http://www.espug.com>

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Alison Down EIA And Land Rights Advisor
The Planning Inspectorate
3D Eagle Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN

Contact: Polly Harris Gorf
Development Services
Direct Dial Tel: [REDACTED]
E-mail: [REDACTED]

Our ref: F/YR18/0135/GEN
Your ref: TR010039-000007

2
26 February 2018

Dear Alison Down EIA And Land Rights Advisor

Consultation about the A47 Wansford to Sutton project from The Planning Inspectorate at Planning Enquiries County Road March Cambridgeshire

Thank you for your consultation received 7 February 2018 in reference to the above.

Having considered your proposal in accordance with Local and National Planning Policies the Council has no comments to make on this proposal, subject to the matters below.

Key issues that you will need to consider in the determination of this proposal are

- the traffic impact of the proposal on highway safety and flow
- the submission of wildlife surveys and mitigation.

Yours sincerely



David Rowen
Development Manager, Development Services

CEMHD Policy - Land Use Planning
NSIP Consultations
Building 2.2, Redgrave Court
Merton Road, Bootle
Merseyside, L20 7HS

Your ref: TR010039
Our ref: 4.2.1.6281
HSE email: NSIP.applications@hse.gov.uk

FAO Alison Down
The Planning Inspectorate
Bristol
BS1 6PN
By e-mail

21/02/18

Dear Ms Down

**PROPOSED A47 WANSFORD TO SUTTON PROJECT (the project)
PROPOSAL BY HIGHWAYS ENGLAND (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as amended) – Regulations 10 and 11**

Thank you for your letter of 7th February 2018 regarding the information to be provided in an environmental statement relating to the above project.

HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?1

According to HSE's records, there are no major accident hazard installations in the vicinity of the infrastructure project, including the 500m buffer area.

However there is one major accident hazard pipeline within the red line boundary; HSE reference 7470, operated by national grid the 9 feeder Peterborough comp / Huntingdon.

There is also one major accident hazard pipeline within the 500m buffer area; HSE reference 8266, 18 feeder Peterborough comp tree / Luton

Hazardous Substance Consent1

The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) will probably require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015.

Hazardous Substances Consent would be required to store or use any of the Named Hazardous Substances or Categories of Substances at or above the controlled quantities set out in schedule 1 of these Regulations.

Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Explosives sites

HSE has no comment to make in this regard as there are no licensed explosive sites in the vicinity of the proposed project.

Electrical Safety

No comment from a planning perspective

Please send any further electronic communication on this project directly to the HSE's designated e-mail account for NSIP applications. Alternatively any hard copy correspondence should be sent to:

Mr Dave Adams (MHPD)
NSIP Consultations
2.2 Redgrave Court
Merton Road, Bootle,
Merseyside L20 7HS

Yours sincerely,



Dave Adams
(CEMHD4 Policy)

From: [REDACTED]
To: [A47 Wansford to Sutton](#)
Subject: WANS - A47 Wansford to Sutton - EIA Scoping Notification and Consultation
Date: 08 February 2018 10:31:48

For the Attention of Alison Down

Further to the email sent on 7 February regarding the above scheme, Highways England (Spatial Planning) has no comments to offer.

Regards.

Davina Galloway

Davina Galloway

Asset Manager

Operations 'East'

Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW

Tel: +44 ([REDACTED])

Web: <http://www.highways.gov.uk>

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Highways England Company Limited | General enquiries: 0300 123 5000
| National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park,
Birmingham B32 1AF | [https://www.gov.uk/government/organisations/highways-](https://www.gov.uk/government/organisations/highways-england)
[england](http://www.highwaysengland.co.uk) | info@highwaysengland.co.uk

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Historic England

EAST OF ENGLAND OFFICE

Mr Michael Breslaw
The Planning Inspectorate
3D, Temple Quay House
Temple Quay
Bristol
BS1 6PN

Direct Dial: [REDACTED]

Our ref: PL00331862

6 March 2018

Dear Mr Breslaw

Scoping Opinion for EIA for DCO for the A47 Wansford to Sutton

Thank you for your letter of 8th February 2018 notifying Historic England of the Environmental Impact Assessment (EIA) Scoping Opinion for the proposed development at the A47 between Wansford and Sutton.

The historic environment is a finite and non-renewable environmental resource which includes designated heritage assets, non-designated archaeology and built heritage, historic landscapes and unidentified sites of historic and/or archaeological interest. It is a rich and diverse part of England's cultural heritage and makes a valuable contribution to our cultural, social and economic life.

This development could, potentially, have an impact upon a number of designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

The Scoping document acknowledges that the proposed development has the potential for impacts on cultural heritage. We are pleased this will be dealt with in a specific chapter within the Environmental Statement. We advise that all supporting technical information (desk-based assessments, evaluation and post-excavation reports etc.) are included as appendices. Where relevant, the cultural heritage should be cross-referenced to other chapters or technical appendices; for example noise, light, traffic and landscape.

The EIA should consider the impact upon both designated and non-designated heritage assets. This should include the impact upon the setting of the heritage assets within the surrounding area.

This development could, potentially, have a significant impact upon a number of designated heritage assets and their settings in the area around the site. In line with



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

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HistoricEngland.org.uk



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the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

Designated assets within 1km of the site include five scheduled monuments, seven grade I listed structures, seven grade II* listed structures and over 70 grade II listed buildings. There are also three Conservation Areas, Wansford, Sutton and Stibbington, in the study area.

We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk <<http://www.heritagegateway.org.uk>>) and relevant local authority staff.

We would strongly recommend that the applicant involves the Conservation Officer of Peterborough City Council and the archaeological staff at Peterborough in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

There is also potential for undesignated buried archaeological remains within the proposed development site. The EIA should define (where possible) the nature, extent and significance of these assets in order to assess the impact from the proposed development. We welcome continued discussion as the project moves forward.

Historic England has had early pre-application discussions regarding the significance of the assets and the degree to which they might be impacted by the proposed development. In particular, discussion has focussed upon the impact on setting of the scheduled monuments as well as listed buildings.

Assessment of setting should not be restricted to visual impact, but should also consider other environmental factors such as noise, traffic and lighting, where relevant. The assessment should be carried out in accordance with established policy and guidance, including the National Planning Policy Framework. The Planning Practice Guidance contains guidance on setting, amplified by the Historic England document *Historic Environment Good Practice Advice in Planning Note 3 The Setting of Heritage Assets*, which provides a thorough discussion of setting and methods for considering the impact of development on setting, such as the use of matrices. Whilst



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standardised EIA matrices or are useful tools, we consider the analysis of setting (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems. Historic England therefore recommends that these should be seen primarily as material supporting a clearly expressed and non-technical narrative argument within the cultural heritage chapter. The EIA should use the ideas of benefit, harm and loss (as described in NPPF) to set out 'what matters and why' in terms of the heritage assets' significance and setting, together with the effects of the development upon them.

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this. Given the number of designated heritage assets within the area, we would welcome continued discussions with the applicant in order to agree the key sites and setting issues which will need to be addressed within the EIA. In particular any heritage specific viewpoints should be identified by the heritage consultant and should be included in the LVIA.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to *in situ* decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

We have the following specific comments to make regarding the content of the Scoping Report:

It would be helpful to present diagrams of the alternative options.

We note the proposed assessment methodology is broadly in accordance with the requirements of the DMRB. We would suggest that in addition to the matrix assessment approach, some commentary is provided relating to heritage and impact on significance and setting.

Table 6.1 sets out the existing baseline in terms of designated and non-designated assets which is helpful. This would appear to be comprehensive.

At paragraph 6.5.1 we would refer the applicants to the revised version of the Good Practice Advice on Planning Note 3 - The Setting of Heritage Assets that was published in December 2017. <https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets.pdf/>>



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





Historic England

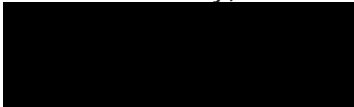
EAST OF ENGLAND OFFICE

There would appear to be some confusion regarding the level of engagement with Historic England to date on this project. Highways England and their consultants have held two meetings with Historic England on 31.8.16 and 10.5.17 during which the potential impacts on the historic environment of the A47 proposals were considered.

Finally, we should like to stress that this response is based on the information provided in this consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise, where we consider that these would have an adverse effect upon the historic environment.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely,



Debbie Mack
Historic Environment Planning Adviser, Planning Group



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Sent: 07 February 2018 11:29
To: A47 Wansford to Sutton
Subject: RE: WANS - A47 Wansford to Sutton - EIA Scoping Notification and Consultation (Our Ref: SG25828)

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours Faithfully



NATS Safeguarding

D: [REDACTED]
E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



From: A47 Wansford to Sutton [<mailto:A47WansfordtoSutton@pins.gsi.gov.uk>]
Sent: 07 February 2018 10:11
Subject: WANS - A47 Wansford to Sutton - EIA Scoping Notification and Consultation

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

Dear Sir/Madam

Please see the attached correspondence about the A47 Wansford to Sutton project.

Please note that the deadline for consultation responses is 7 March 2018 and is a statutory requirement that cannot be extended.

Kind Regards

Alison

Alison L Down

EIA & Land Rights Advisor – Environmental Services Team

Major Applications and Plans

The Planning Inspectorate, 3C Eagle, Temple Quay House, Temple Quay, Bristol,
BS1 6PN

Direct Line: [REDACTED]

Helpline: 0303 444 5000

Email: alison.down@pins.gsi.gov.uk

Web: <https://infrastructure.planninginspectorate.gov.uk/> (National Infrastructure Planning)

Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

Twitter: @PINSgov

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Sent electronically to:

A47WansfordtoSutton@pins.gsi.gov.uk

Nick Dexter
DCO Liaison Officer
Land & Business Support

Tel: +44 [REDACTED]

www.nationalgrid.com

6th March 2018

Dear Sir / Madam,

Ref: TR010039 - A47 Wansford to Sutton Project - EIA Scoping Notification and Consultation

I refer to your letter dated 7th February 2018 in relation to the above proposed application for a Development Consent Order for the proposed A47 Wansford to Sutton Project. Having reviewed the Scoping Report, I would like to make the following comments:

National Grid infrastructure within / in close proximity to the order boundary

Electricity Transmission

National Grid Electricity Transmission has a high voltage electricity overhead transmission line within or in close proximity to the proposed order limits. The overhead line forms an essential part of the electricity transmission network in England and Wales. The details of the overhead line are shown below:

- 4VK (400kV) overhead line route

Gas Transmission

National Grid Gas has a high pressure gas transmission pipeline located within or in close proximity to the proposed order limits. The transmission pipeline forms an essential part of the gas transmission network in England, Wales and Scotland:

- Feeder Main 9 (Peterborough to Whitwell)

I enclose a plan showing the route of National Grid's overhead line and the gas transmission pipeline.

Electricity Infrastructure:

- National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no

permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 3 (2004).

- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive’s (www.hse.gov.uk) Guidance Note GS 6 “Avoidance of Danger from Overhead Electric Lines” and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum “sag” and “swing” and overhead line profile (maximum “sag” and “swing”) drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation (“pillar of support”) drawings can be obtained using the contact details above
- National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.
- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

Gas Infrastructure:

The following points should be taken into consideration:

- National Grid has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings, or structures, change to existing ground levels, storage of materials etc.

Pipeline Crossings:

National Grid is a trading name for:
National Grid Electricity Transmission plc
Registered Office: 1-3 Strand, London WC2N 5EH
Registered in England and Wales, No 2366977

National Grid is a trading name for:
National Grid Gas plc
Registered Office: 1-3 Strand, London WC2N 5EH
Registered in England and Wales, No 2006000

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at previously agreed locations.
- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.
- The type of raft shall be agreed with National Grid prior to installation.
- No protective measures including the installation of concrete slab protection shall be installed over or near to the National Grid pipeline without the prior permission of National Grid.
- National Grid will need to agree the material, the dimensions and method of installation of the proposed protective measure.
- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to National Grid.
- Please be aware that written permission is required before any works commence within the National Grid easement strip.
- A National Grid representative shall monitor any works within close proximity to the pipeline to comply with National Grid specification T/SP/SSW22.
- A Deed of Consent is required for any crossing of the easement

Cables Crossing:

- Cables may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- A National Grid representative shall supervise any cable crossing of a pipeline.
- Clearance must be at least 600mm above or below the pipeline.
- Impact protection slab should be laid between the cable and pipeline if cable crossing is above the pipeline.
- A Deed of Consent is required for any cable crossing the easement.
- Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.

General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and National Grid's specification for Safe Working in the Vicinity of National Grid High Pressure gas pipelines and associated installations - requirements for third parties T/SP/SSW22.

- National Grid will also need to ensure that our pipelines access is maintained during and after construction.
- Our pipelines are normally buried to a depth cover of 1.1 metres however; actual depth and position must be confirmed on site by trial hole investigation under the supervision of a National Grid representative. Ground cover above our pipelines should not be reduced or increased.
- If any excavations are planned within 3 metres of National Grid High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a National Grid representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.
- Excavation works may take place unsupervised no closer than 3 metres from the pipeline once the actual depth and position has been confirmed on site under the supervision of a National Grid representative. Similarly, excavation with hand held power tools is not permitted within 1.5 metres from our apparatus and the work is undertaken with NG supervision and guidance.

To view the SSW22 Document, please use the link below:

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW/safeworking.htm>

To download a copy of the HSE Guidance HS(G)47, please use the following link:

<http://www.hse.gov.uk/pubns/books/hsg47.htm>

Further Advice

We would request that the potential impact of the proposed scheme on National Grid's existing assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.

Where any diversion of apparatus may be required to facilitate a scheme, National Grid is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by National Grid. Further information relating to this can be obtained by contacting the email address below.

Where the promoter intends to acquire land, extinguish rights, or interfere with any of National Grid apparatus protective provisions will be required in a form acceptable to it to be included within the DCO.

National Grid requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: box.landandacquisitions@nationalgrid.com

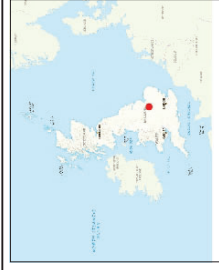
I hope the above information is useful. If you require any further information please do not hesitate to contact me.

The information in this letter is provided not withstanding any discussions taking place in relation to connections with electricity or gas customer services.

Yours Faithfully



Nick Dexter.

**Legend:**

- Substations Commissioned
- Circuit
- Commissioned
- Decommissioned Group
- Decommissioned
- OHL 400kV Commissioned
- OHL 275kV Commissioned
- OHL 132kV & Below Commissioned
- Towers Commissioned
- Decommissioned Towers
- Barred Cable Commissioned
- Decommissioned Barred Cable
- Fiber Cable Commissioned
- Pilot Cable
- Oil Pipe
- Cooling Station
- RAMM
- Gas Operational Boundary
- Gas Site Boundary
- Block Valve
- Compressor
- Valve
- Malfunction
- Minimum Offtake
- Future Minimum Offtake
- Offtake
- Pressure Reduction Installation
- Pig Trap
- Terminal
- Transformer Offtake
- Transformer
- Gas Pipe Breaker
- Gas Pipe Follower
- Commissioned
- Decommissioned
- Planned and Spares
- GPV Projected Section
- Range

Notes:

A47 Wansford to Sutton - NG Assets



Date: 7 March 2018
Our ref: 13110/238670
Your ref: TR010039-000007



The Planning Inspectorate
3D Eagle Wing
Temple Quay House
2 The Square
Bristol, BS1 6PN

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Sir/Madam

Environmental Impact Assessment Scoping consultation (Regulation 15 (3) (i) of the EIA Regulations 2011):

Proposal: Application by Highways England (the Applicant) for an Order granting Development Consent for the A47 Wansford to Sutton Project (the Proposed Development)
Location: A47 Wansford to Sutton Project, Cambridgeshire

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated 7 February 2018 which we received on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law¹ and guidance² has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Louise Oliver on 020802 64893. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully

Louise Oliver
Norfolk and Suffolk Area Team

¹ Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)

² *Note on Environmental Impact Assessment Directive for Local Planning Authorities* Office of the Deputy Prime Minister (April 2004) available from <http://webarchive.nationalarchives.gov.uk/+/http://www.communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/noteenvironmental/>

Annex A – Advice related to EIA Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

2. Biodiversity and Geology

2.1 Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EclA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.118 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2 Internationally and Nationally Designated Sites

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (e.g. designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2017. In addition paragraph 118 of the National Planning Policy Framework requires that potential Special Protection

Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)

The development site is close to the following designated nature conservation site(s):

- Sutton **Heath and Bog** Site of Special Scientific Interest (SSSI)
- Wansford Pasture SSSI (which lies to the south **west**)
- Old Sulehay Forest SSSI
- West Abbot's and Lound Woods SSSI (which lies to the **north west**)
- Castor Hanglands SSSI
- **Castor Flood Meadows SSSI (which lies to the south east)**
- **Castor Hanglands National Nature Reserve (NNR) (which lies to the north east)**

Wording in bold above reflects corrections to, or omissions from the list of sites in *Table 8.2. Summary of Existing Nature Conservation Baseline* in the EIA scoping document. Please note there is an error in *Table 8.2.* as the River Wensum SAC and SSSI is located solely in Norfolk, rather than being listed as 1.6 km to the north-east of the proposed scheme.

- Further information on the SSSIs and their special interest features can be found at www.magic.gov. The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within these sites these sites and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.
- Natura 2000 network site conservation objectives are available on our internet site <http://publications.naturalengland.org.uk/category/6490068894089216>

2.3 Regionally and Locally Important Sites

The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

At the pre-submission stage, Natural England made several requests, to the applicant, to ensure that County or Local Wildlife Sites were depicted on all relevant plans. It is disappointing to note that within the submitted EIA scoping document, these sites have not been included on either *Figure B1 Environmental Constraints Site Level* or on *Figure B.2 Environmental Constraints Wider Context*. We trust this omission will be rectified on all future relevant plans as a number of Local Wildlife Sites will be affected or destroyed by the proposal.

2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted [standing advice](#) for protected species which includes links to guidance on survey and mitigation.

2.5 Habitats and Species of Principal Importance

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here <https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity>.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g. whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

2.6 Contacts for Local Records

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

Local Record Centre (LRC) in Cambridgeshire please contact:

Cambridgeshire and Peterborough Environmental Records Centre
The Manor House
Broad Street
Greater Cambourne
Cambridgeshire CB23 6DH

Telephone: 01954 713570 Email: data@cperc.org.uk

3. Designated Landscapes and Landscape Character

Landscape and visual impacts

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography. The European Landscape Convention places a duty on Local Planning Authorities to consider the impacts of landscape when exercising their functions.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant [National Character Areas](#) which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

Heritage Landscapes

You should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list may be obtained at www.hmrc.gov.uk/heritage/lbsearch.htm.

4. Access and Recreation

Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Rights of Way, Access Land, and National Trails

The EIA should consider potential impacts on access land, public open land and rights of way routes in the vicinity of the development. Appropriate mitigation measures should be incorporated for any adverse impacts. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

5. Soil and Agricultural Land Quality

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 112 of the NPPF. We also recommend that soils should be considered under a more general heading of sustainable use of land and the ecosystem services they provide as a natural resource in line with paragraph 109 of the NPPF.

Soil and Agricultural Land Quality

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably.

The applicant should consider the following issues as part of the Environmental Statement:

1. The degree to which soils are going to be disturbed/harmed as part of this development and whether 'best and most versatile' agricultural land is involved.

This may require a detailed survey if one is not already available. For further information on the availability of existing agricultural land classification (ALC) information see www.magic.gov.uk. Natural England Technical Information Note 049 - [Agricultural Land Classification: protecting the best and most versatile agricultural land](#) also contains useful background information.

2. If required, an agricultural land classification and soil survey of the land should be undertaken. This should normally be at a detailed level, eg one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, ie 1.2 metres.
3. The Environmental Statement should provided details of how any adverse impacts on soils can be minimised. Further guidance is contained in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#).

As identified in the NPPF new sites or extensions to new sites for peat extraction should not be granted permission by Local Planning Authorities or proposed in development plans.

6. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition ([England Biodiversity Strategy](#), Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

7. Climate Change Adaptation

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' ([NPPF](#) Para 109), which should be demonstrated through the ES.

8. Contribution to local environmental initiatives and priorities

The road proposal falls within The Nene Valley Nature Improvement Area (NIA), which is re-creating and re-connecting natural areas along the Nene and its tributaries from Daventry to Peterborough. Further information about this NIA can be found here (<http://www.nenevalleynia.org/>). It is one of 12 NIAs that were selected through a national competition announced in the Natural Environment White Paper in 2011. The Nene Valley Nature Improvement Area (NIA) focuses its policies, funding and delivery across its area to deliver a step change in nature conservation, with local organisations, businesses and communities working together with a shared vision for the natural environment, aiming to create more and better-connected habitats over large areas in the Nene Valley, which provide the space for wildlife to thrive and adapt to climate change. The Nene Valley NIA also helps people as well as wildlife – through enhancing a wide range of benefits that nature provide us, such as recreation opportunities, flood protection, cleaner water and carbon storage.

The proposed improvements to the A47 between Wansford to Sutton should fit with, and compliment, the objectives of The Nene Valley NIA.

9. Cumulative and in-combination effects

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the

development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Telephone: 01733 453410
Email: planningcontrol@peterborough.gov.uk
Case Officer: Mrs T J Nicholl
Our Ref: 18/00329/CONSUL
Your Ref:



Planning Services

Ms Alison Down
The Planning Inspectorate
3C Eagle
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Town Hall
Bridge Street
Peterborough
PE1 1HF

Peterborough Direct: [REDACTED]

6 March 2018

Dear Ms Down

Planning enquiry

Proposal: Consultation regarding A47 Wansford to Sutton project

Site address: A47 Wansford Peterborough

Your client: Ms Alison Down The Planning Inspectorate

Further to your enquiry received on 7 February 2018, in respect of the above, the Local Planning Authority makes the following comments:

The Local Planning Authority wishes to make it clear that our comments on this EIA Scoping Report are limited to the scoping exercise for EIA purposes only. The LPA has not been party to consultation to date and has therefore not provided input into the consultation undertaken to date. Therefore our views on this scoping report should not be taken as the LPA having no objections or comments to make on the merits of the scheme. If the applicant wishes to seek pre-application engagement with the LPA on a comprehensive basis contact should be made in the first instance with Theresa Nicholl (Development Manager) - theresa.nicholl@peterborough.gov.uk

Comments on the Scoping Report dated February 2018:

Appendix B doesn't map County Wildlife Sites, Conservation Areas or locally listed buildings and it should do as these designations are potentially affected by the proposals.

It is agreed that population and human health can be addressed in other chapters (but needs to be clear) and that major accidents and disasters, heat and radiation and transboundary effects can be scoped out.

1.11 Planning Policy Context - does not include Peterborough City Council development plan policies nor the NPPF. The scheme needs to be assessed against all prevailing planning policy and not just highways policies.

Paragraph 2.3.3 should be Figure B.1 in Appendix A and not A.1

Consideration of Alternatives/Consultation

This has been undertaken and narrowed to one option without consultation with the LPA. It is not clear from this Scoping Report why the option being put forward has been chosen. We understand that as far as the local consultation is concerned, the chosen option was the least favoured so explaining why the preferred option has been chosen needs to be transparent and logical. As it

appears to have been largely a modelling exercise and the local views have not been given much weight, such transparency and logic is difficult to see in this Scoping Report. Paragraph 3.1.6 refers to a Sutton Scheme Assessment Report but it is understood this report has not yet been put in the public domain. The Local Planning Authority has not been provided with a copy of this report. Paragraph 3.2.4 states that key concerns raised during the non statutory consultation resulted in a change to the Option 2 chosen. The Environmental Assessment must clearly set out what concerns have been raised and by who and how these have influenced (or not) the option chosen. It is reiterated that the LPA has not been requested to date to take part in consultation which we consider is a failing on the part of the applicant. Engagement with the LPA should have commenced well before an option was chosen. The same is true for the statutory environmental bodies. It is difficult to see how an option could already be chosen which is likely to affect designated nature and heritage assets and yet the input of the relevant bodies has not been sought. This lack of consultation brings into question the robustness of the consideration of alternatives and effectiveness of meaningful consultation.

Cultural Heritage

Locally listed buildings are designated heritage assets. The scoping is quite vague ie paragraph 6.8 states it is probable that geophysical surveys and trial trenching will take place. Given the potential for archaeology in this area, we don't understand how this scheme could take place without such site investigations. We agree that further detailed assessment must be undertaken and that Historic England and PCC archaeology should be consulted/involved.

Landscape and Visual Effects

Contractors for the applicant have contacted PCC about agreeing viewpoints for the LVIA. We are dealing with this as pre-application advice. Paragraphs 7.73 and 7.74 discuss retaining existing trees and hedges and providing new planting. The ES must include a full tree and hedge survey (identifying the quality of each) and a plan and schedule of what is to be retained and what would be removed. There must also be a proposed mitigation planting plan and schedule.

Biodiversity

The scope of the surveys and assessments is acceptable. However, there will need to be reasoned justification as to why the route option which has most affect on the County Wildlife Sites has been chosen.

Geology and Soils

Paragraphs 10.3.3 and 10.3.4 refer to Norfolk. The site is in Cambridgeshire and close to the border with Northamptonshire and nowhere near Norfolk.

Conclusions

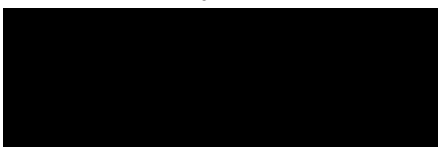
Table 16.2 cultural heritage - needs to be PCC archaeologist as the site is within the Peterborough City Council boundary and PCC is a unitary authority.

Each chapter must be attributed to a competent person as required by Section 14 (4) a and b of the Infrastructure Planning EIA Regulations 2017.

Finally, we advise that as well as consulting with the LPA, the applicant should be engaging with the local Parish Councils in a meaningful way and could benefit from the local knowledge of the area that the Parish Councils have.

I trust that the above advice is of use however should you have any further queries, please do not hesitate to contact me on the details shown at the top of this letter.

Yours sincerely

A large black rectangular box used to redact the signature of the sender.

Mrs T J Nicholl
Development Manager



A47 Wansford to Sutton

Royal Mail Group Limited comments on information to be provided in applicant's Environmental Statement

Introduction

Reference the letter from PINS to Royal Mail dated 7 February 2018 requesting Royal Mail's comments on the information that should be provided in Highways England's Environmental Statement for the proposed A47 Wansford to Sutton improvements.

Royal Mail's consultants BNP Paribas Real Estate have reviewed the applicant's Scoping Report as published on 6 February 2018.

Royal Mail– relevant information

Royal Mail is responsible for providing efficient mail sorting and delivery nationally. As the Universal Service Provider under the Postal Services Act 2011, Royal Mail has a statutory duty to deliver mail to every residential and business address in the country as well as collecting mail from all Post Offices and post boxes six days a week.

Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.

Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.

Royal Mail therefore wishes to ensure the protection of its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations which may potentially be adversely affected by the construction of this proposed road scheme.

Royal Mail has three operational facilities within 10 miles of the proposed scheme:

1. Peterborough Mail HUB, Unit 5 Haddenbrook Business Centre, Peterborough PE2 6YX
2. Orton Southgate Delivery Office, Newcombe Way, Peterborough PE2 6BZ
3. Peterborough MC / DO, Papyrus Road, Peterborough PE4 5PE

The A47 west of Peterborough is an important distribution route for Royal Mail services. In exercising its statutory duties, Royal Mail vehicles from the above and other operational facilities use on a daily basis all of the local roads that may potentially be affected by additional traffic arising from the construction of the proposed scheme.

It is envisaged that the proposed scheme will, once constructed, have benefits for Royal Mail operational traffic movements. However, Royal Mail is concerned about the potential for disruption to its operations during the construction phase. In particular, Royal Mail requires more information and certainty from Highways England about traffic management measures that will be put in place to mitigate construction impacts on traffic flows on the surrounding local highway network.



Royal Mail's comments on information that should be provided in Highways England's Environmental Statement

In view of the above, Royal Mail has the following comments / requests:

1. The ES should include information on the needs of major road users (such as Royal Mail) and acknowledge the requirement to ensure that major road users are not disrupted through full advance consultation by the applicant at the appropriate time in the DCO and development process.
2. The ES and DCO application should include detailed information on the construction traffic mitigation measures that are proposed to be implemented by Highways England / its contractor, including a draft Construction Traffic Management Plan (CTMP).
3. Royal Mail is fully pre-consulted by Highways England / its contractor on any proposed road closures / diversions/ alternative access arrangements, hours of working and the content of the CTMP. The ES should acknowledge the need for this consultation with Royal Mail and other relevant major road users.

Royal Mail is able to supply Highways England with information on its road usage / trips if required.

Should PINS or Highways England have any queries in relation to the above then in the first instance please contact Joe Walsh ([REDACTED]) of Royal Mail's Legal Services Team or Daniel Parry-Jones ([REDACTED]) of BNP Paribas Real Estate.

From: [REDACTED]
To: [A47 Wansford to Sutton](#)
Subject: Scoping opinion consultation
Date: 20 February 2018 14:24:52
Attachments: [image001.png](#)

Ref: TR010039-000007

Dear Sir/ Madam,

I can confirm that South Kesteven District Council has no comments to make in respect of the above consultation.

Phil Jordan
Development Management Planning Officer
Development & Growth
South Kesteven District Council
Council Offices, St. Peter's Hill
Grantham, Lincolnshire, NG31 6PZ
Tel: [REDACTED]
Email: [REDACTED]
www.southkesteven.gov.uk

East Midlands Building Consultancy a partnership between South Kesteven DC, Rushcliffe BC and Newark and Sherwood DC.

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info@eastmidlandsbc.com / www.eastmidlandsbc.com



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SUTTON PARISH COUNCIL



5th March 2018

The Planning Inspectorate
3D Eagle Wing
Temple Quay House
2 The Square
BRISTOL BS1 6PN

Your Ref: TR010039-000007
Attn: Alison Down

Dear Alison Down

Application by Highways England for an Order Granting Development Consent for the A47 Wansford to Sutton Project: Scoping consultation.

Thank you for your letter of 7th February 2018 and subsequent communication.

I attach the comments of Sutton Parish council on the Scoping Report.

Yours sincerely



Deirdre McCumiskey
Clerk to Sutton Parish Council

Copy: Clerk to Wansford Parish Council
Chair of Wansford/Sutton A47 Community Consultation Team

Scoping Report: Proposed A47 Dualling between Wansford and Sutton

COMMENTS OF SUTTON PARISH COUNCIL

1. Introduction

- 1.1 By letter dated 7 February 2018, (your reference TR010039-000007) Sutton Parish Council (SPC) was invited to “inform the Planning Inspectorate of the information you consider should be provided in the Environmental Statement” (ES) with respect to the proposed dualling of the A47 between Wansford and Sutton by Highways England (HE). This invitation followed an application to the Planning Inspectorate by HE for a Scoping Opinion supported by the latter’s *EIA Scoping Report* of February 2018.
- 1.2 At the date of this invitation, SPC had not been provided with HE’s full reasons and assessments for the choice of the Preferred Route. A Scheme Assessment Report (SAR) had been promised for before the end of 2017 but had not been forthcoming. On 13 February 2018, SPC therefore asked that the request for comments be suspended until after the SAR became available otherwise it would not be possessed of sufficient information to make substantive comments. The Planning Inspectorate declined this request on grounds that the detail provided in the Scoping Report was a matter for HE and appeared to satisfy the relevant Regulations. Fortuitously, that same day (13 February), the SAR received a limited release from HE albeit still marked “Draft” and with a request to restrict its circulation.
- 1.3 SPC now makes these comments pursuant to the Planning Inspectorate’s invitation based on the Scoping Report and draft SAR. For ease of reference the main headings and paragraph numbers used in these comments correspond to those in the Scoping Report. Where no heading or paragraph number appears SPC has no comment at this time.

2. Proposed Scheme

- 2.1 SPC agrees that the present single-carriageway A47 is a dangerous bottleneck. Dualling is long overdue; a dualling scheme under the aegis of the Department of Transport was proposed as far back as the 1970s. A 2015 feasibility study by AECOM on behalf of HE identified two route options both of which were to the north of the existing A47. No southern route of the type now proposed by HE was recommended. SPC strongly disagrees that the Preferred Route is the best option. It is SPC’s case that the better route is to the north of the existing A47, namely Option 3 (originally Option 10) as defined at paras 3.1.12 and 3.2.1 of the Scoping Report.
- 2.2 SPC supports the Proposed Scheme Objectives. However SPC does not accept that the Preferred Route to the south of the present A47 is the best option for achieving all these objectives. In particular there will be severe adverse impacts on local residents and the natural environment. The Preferred Route brings the A47 nearer the only major settlement along the route to be dualled (the village and Conservation Area of Sutton) and goes through the County Wildlife Site along the north bank of the River Nene. Nor do the

proposals adequately take into account local communities, cyclists, walkers, equestrians and other non-motorist groups (NMUs); in contrast Option 3 would allow for the existing A47 to be utilized by these groups and local traffic. Furthermore, on HE's own costs estimates given in the draft SAR, the Preferred Route is at least 10% (£6m) more expensive than Option 3.

- 2.3.3 SPC notes that the proposed draft Development Consent Order (DCO) site boundary may be subject to change. While this perpetuates the uncertainties that have surrounded HE's plans, SPC urges that the opportunity for change allows the incorporation of Option 3 within the ES and its proper evaluation and adoption. In short, the DCO boundary should be expanded to allow for alternative road alignments to be included, specifically Option 3.

3. Consideration of Alternatives

- 3.2.2 The public consultation results showed little enthusiasm for the Preferred Route contrary to the impression given in the Scoping Report. Of the three options presented, the Preferred Route was the least popular with only 36 respondents somewhat or strongly in favour. In contrast, 87 respondents were somewhat or strongly in favour of Option 3, which made it the most popular option (see Figure 25-7 at p.181 of the SAR). For reasons known only to itself, HE has sought to play down the significance of the public consultation (see for example Para 24.6.1 at page 176 of the SAR). In fact the 170 respondents represent a healthy two thirds of households along the route.
- 3.2.3 HE has provided no proper explanation either here or in the SAR as to how the factors determining the choice of route have been assessed and weighted in their decision-making processes. Certain assessments may favour the Preferred Route but others clearly favour Option 3, to include the cheaper cost, the higher Benefit Cost Ratio and better Buildability (SAR paras 27.11.7-8).
- 3.2.4 It is inaccurate to say that "most of the existing A47" will remain in place for local traffic and other users under the Preferred Route. So far as SPC understands the current HE proposal, the entirety of the existing A47 west of the Sutton Heath Road will be lost, which represents about half of the road's length.

4. Consultation

The factual content of this section of the Scoping Report may not be incorrect, although there has been a suggestion that not all affected landowners were consulted. Furthermore much of the consultation to date has been of limited value and has given rise to great frustration due to the minimal illustrative nature of the route options. There has been an unwillingness to illustrate likely land-take and no information as to how side roads are (or are not) to be connected to the new road in the various options. Nowhere have routing solutions for cyclists, pedestrians and equestrians been suggested despite 'providing a safer route between communities for cyclists, walkers, equestrians and other non-

motorised groups' being one of the Proposed Scheme objectives (para 2.2.1 page 20 of the Scoping Report)

These shortcomings have not prevented public opinion from favouring Option 3 which clearly has the greatest potential for minimizing the environmental impacts of noise, light and air pollution in Sutton, damage to the County Wildlife Site and the adverse effect on the landscape of this part of the Nene Valley. Option 3 also offers the most obvious solution for NMUs in that the existing A47 road surface can be utilized for them.

Hence SPC strongly considers that Option 3 and/or the AECOM 2015 northerly option should be included within the DCO site boundary so that a northern option can be assessed as part of the ES and become part of the statutory consultation process.

5. Air Quality

It appears that air monitoring has only been performed at the Western end of the proposed scheme and with only two sets of monitoring results. This is totally unsatisfactory. Detailed measurements need to be taken at appropriate locations and times along the whole route to include the village of Sutton, the only major settlement along the eastern section of the route. A sample of sufficient size is needed to guard against flaws in instruments.

6. Cultural Heritage

6.3.4 Table 6.1 Buildings of Local Importance.

There are three, not two, adjacent to the Preferred Route. The three are listed in the Local List of Heritage Assets in Peterborough: December 2016 (a Secondary Evidence document supporting the New Local Plan). The three are:

Heath House (S1)

Former Railway Station buildings (S2).

Sutton Bridge No6- A47 (S3)

6.4.1 It is essential that investigations include Option 3 for the reasons already described, in particular the serious flaws with the Preferred Route.

6.4.2 It is well established that this area is rich in archaeology from many periods. SPC consider it seriously remiss that HE has not already commissioned a comprehensive non-invasive archaeological assessment. Instead, HE has simply regarded the Scheduled Monument as the only relevant archaeological feature on the route and one to be avoided at all costs. This has unduly constrained HE in its route choice and caused an unjustified rigidity in route selection. HE appears to have given no proper consideration as to whether wholly exceptional circumstances exist for a small section of the Scheduled Monument (one out of several Bronze Age barrows that occupy the Scheduled Monument site) to be either excavated or bridged as part of Option 3. SPC notes that both CCC and PCC requested that archaeological assessments be undertaken (in 6.6.2) and that limited work will or has been undertaken (6.6.3). Since this appears to be restricted to the Scheduled Monument

itself, SPC has commissioned a professional assessment for a strip 200m either side of the Preferred Route line. This will be made available to HE and other interested parties in due course.

- 6.7.1. Although the old station house and bridge are building of local importance they are, because of their location, almost completely unknown to the residents of the area. The old station house would be of considerably greater significance if it was relocated and there are possible sites for this along the route of the long abandoned Wansford to Stamford railway. Heath House would not be affected by any of the likely alignments.
- 6.8.1 SPC considers it essential that a desk-top study, geophysical survey and, where appropriate, trial trench evaluation be undertaken for the entire length of both the Preferred Route and Option 3.
- 6.10.1 SPC welcomes the proposed assessment of operational impacts on sensitive receptors within 1km of the Proposed Scheme.

7. Landscape

The Preferred Route will start to the north of the existing A47 in gently undulating land. Once it crosses the A47 to the south side it will go very close to the river Nene and, because the road will be high above the river, it will have a massive impact on the visual amenity of the area. This impact will be very apparent to the many users of the Nene Way footpath if indeed the path can be fitted between the road and the river. The area south of the river is a designated area of high landscape value, a fact that the Scoping Report ignores. Immediately east of the old railway line, the preferred route would wipe out the only fragment of ancient forest in the immediate area.

By comparison the Option 3 alignment traverses fairly level land and is not overlooked from any vantage points. It has been suggested that this alignment obstructs the view from the Sacrewell Centre but this is not correct. There is a rise in the ground between the two.

It is essential that both routes are evaluated to demonstrate the extent of the landscape damage done by the Preferred Route.

8. Biodiversity

Placing the new road very close to the River Nene will displace a well-documented population of otters and water voles, as confirmed in the Environmental Scoping. Strangely the Scoping Report does not mention insects, even though these are the food for many of the species referred to. The river bank is rich in insect life and this is why birds and bats are frequently seen along the river. This insect life will be destroyed by the road on the Preferred Route alignment. Putting the road close to the river will cut a valuable wildlife corridor and have adverse effects both directly physically and through vibration and noise. The Option 3 route has none of these impacts.

There is locally gathered information to indicate that the distribution of bat roosts described is wrong. The breeding birds survey was carried out when most birds had finished breeding.

It is important that the ecological studies are redone, preferably working with the local community and wildlife groups who know the area well. Their knowledge would be of value as a supplement to single day visits by outsiders. It is interesting that this section of the Scoping Report does not mention working with local bodies.

9. Geology and Soils

The slope down from the A47 to the river Nene is well known to be unstable. Both the Filling Station and the Anglian Water pumping station have slipped towards the river at various times. This problem was documented in 1981 in a paper by Chandler. HE were warned about this at the beginning of the project and yet the Scoping Report makes no mention of a literature search being carried out.

Building the road close to the river will be expensive and will always carry the risk of ground movement.

The SAR document expects these problems to add £6 million to the cost of the project.

The size of this additional cost makes it important that the various issues are investigated fully.

10. Materials

All options use basically the same materials except that the Preferred Route will require the importation of a large amount of high quality fill to construct the embankment (or other structure) on the floodplain. Extraction of this fill will do environmental damage. The Preferred Route will presumably require the removal of quantities of asphalt which then has to be treated as a contaminated material. Option 3 avoids these problems and emphasizes the need to assess all options.

11. Noise and Vibration

Wansford Parish Council has serious concerns about noise and vibration impacts on their residents. Whilst of a different nature, there will clearly be an increase in adverse noise effects in Sutton too.

Moving the road closer to the river Nene will increase the levels of noise and vibration, significantly degrading the habitat for wildlife.

The noise and vibration from the upgraded road must be fully investigated and the results made public before any decisions are made.

12. People and Communities

12.3.2 Table 12.1 Under Community and land there is no mention of the serious and protracted problems associated with the Wansford picnic area's use as a truck stop. This contributes to the current impassability of the A47 corridor as a west-east route for NMUs and equestrians.

NMUs: A February survey of PROWS (page 103) would indeed show low usage. This is significantly higher in the warmer months. But demand is depressed by the dangerous nature of the A47 carriageway for cyclists and the unsavoury nature of parts of the Nene Way (i.e. at the truckstop) for pedestrians and equestrians.

Development Land (page 104). The current suite of Local Development Plan Documents is due shortly to be replaced by a new Local Plan, currently at Submission stage. The proposal for up to 1200 homes on land owned by the former Homes and Communities Agency (HCA) was reduced by the HCA during the draft local plan process by the deletion of the triangle of land north of Sutton. And now the entire proposal has been deleted from the Submission Version due for Independent Examination Hearing in April/May 2018. The land has been in public ownership since the 1970s but its development would be contrary to current and proposed planning policy so it should not be regarded as 'development land'. Indeed it is ideally placed to accommodate Option 3. Agricultural Land: Land to the north of the A47 is predominantly Grade 3b with historical cropping information identifying severe restrictions on range and yield. To the south the land is predominantly Grades 2 and 3a. The DCO boundary taken further north to allow for an Option 3 would safeguard the higher quality land.

12.7.4 Driver Stress. The amount of disruption during the construction of the Preferred Route will be considerable due to severance of the existing A47 and the need for lengthy and time-consuming diversions. This would not be necessary with the adoption of Option 3 which would allow the existing carriageway to continue in use for far longer and very significantly reduce driver stress during the construction phase.

12.7.17 The need for a new NMU route along this A47 corridor as part of this project is of great importance both to improve local connectivity between villages for local residents and to provide a much-needed strategic link between the Peterborough area and the Northampton countryside for pedestrians, cyclists and equestrians. Restricting the DCO boundary so tightly on the northern side of the Preferred Route unduly restricts design options.

13. Road Drainage and Water Environment

13.10 HE's findings based on "previous assessments" concludes at para. 13.10 that there are "potentially significant impacts" on water and flooding. Bearing in mind the potential for pollution of the river due to its proximity these needs the fullest possible investigation.

15. Combined and Cumulative Effects

- 15.1.2 HE states that with “further assessment ... required for a number of environmental topics....no assessment” has been made under this heading in the Scoping Report. Apparently these further assessments will follow in the Environmental Statement. In this unsatisfactory situation it is difficult for SPC to make any meaningful comment on Combined and Cumulative Effects. As a general observation, however, it is clear that the Preferred Route will have major and in some cases detrimental effects which should be compared with the situation were Option 3 to be pursued.

16. Conclusions

16.1.2 Table 16.1.

SPC considers that a “Detailed” level of assessment should be undertaken in all categories save Climate. The reasons for this are described under the respective categories above, but to illustrate the point a “Simple” assessment of impact on the water environment when the Preferred Route passes over a floodplain and is bound to generate substantial storm water runoff into it seems to verge on the reckless.

16.1.3 Table 16.2

Cultural Heritage: consultation should also be undertaken with Rebecca Cassa-Hatton, Peterborough City Archaeologist who maintains the relevant HER.

Landscape: To take advantage of local knowledge we urge that consultation on viewpoints also be undertaken with Sutton and Wansford Parish Councils and Stibbington PC

Concluding comments of Sutton Parish Council

a) SPC has seen a draft of Wansford Parish Council’s comments on the Scoping Report and fully endorses them. It is astonishing that this far into the planning process there is no clear information about the intentions for the A1/A47 junction nor the connection of side roads, provision for NMUs or proposals for the Sutton Roundabout (styled the Nene Way roundabout by HE).

b) The Scoping Report is based on the flawed premise that the Preferred Route is the only option worthy of examination. Yet as indicated above it is based entirely on the incorrect notion of the inviolability of any part of the Scheduled Monument. In contrast Option 3 is the cheaper, technically simpler and more environmentally friendly option. SPC strongly recommends that the DCO site boundary be enlarged to allow for the design and proper consideration of Option 3 as this matter goes forward.

WANSFORD PARISH COUNCIL

www.wansfordvillage.com

Clerk: Wendy Gray



Telephone: [REDACTED]

The Planning Inspectorate
3D Eagle Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN

5 March 2018

Dear Sir

Response to the A47 Wansford to Sutton Environmental Impact Assessment Scoping Report

References:

Your letter TR010039-000007 dated 7 Feb 18

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Highways England (the Applicant) for an Order granting Development Consent for the A47 Wansford to Sutton Project (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

In response to your letter of the 7th February, Wansford Parish Council has considered the issues in the **A47 Wansford to Sutton Environmental Impact Assessment Scoping Report (EIASR)** carefully and our conclusions are given in the attached report.

We have several major problems with the document:-

There is a general lack of information about the Project. At the time your letter was sent, no one had seen the Project Scheme Assessment Report (SAR) on which the EIASR is based. Since your letter, Highways England (HE) has issued a draft of that Report to Councillors but we are not allowed to circulate it to gain input from our many knowledgeable residents.

Even with sight of the draft SAR, there is no clarification of the scheme layout at the A1/A47 junction and hence no one can assess the impacts it will have.

Despite overwhelming public support for the Option 3 alignment in the non-statutory consultation, HE has declared the Option 2 alignment to be the Preferred Route. This decision seems to though the damage to this from Option 3 would be minor (an opinion that is supported by professional archaeological advice). HE has ignored the substantial negative impact that be driven entirely by the presence of a Scheduled Monument, even the

Preferred Route would have in other aspects. It has also ignored a 10% (£6 million) uplift in the Project costs as a result of its decision.

Rather than delay the work on the EIA, we would suggest that it goes ahead on the basis of the Scoping Report but with the defined Development Consent Order area expanded to allow for the Option 3 alignment and for any likely layout of the A47/A1 boundary. The exact extent of this enlargement will have to be defined after discussions.

We would be pleased to discuss this letter and the contents of the attached report.

Yours faithfully



Parish Clerk
On behalf of Wansford Parish Council

Copy:

HE Bedford
Leader Peterborough City Council - Cllr John Holditch
PCC Highways Dept – Attn Andy Tatt
Chairman Sutton Parish Council - Cllr Peter Lee

Attachment:

Response to the A47 Wansford to Sutton Environmental Impact Assessment Scoping
Report dated 5 Mar 18

For

The Planning Inspectorate

A47 Wansford to Sutton

Comments on the EIA Scoping Report

By

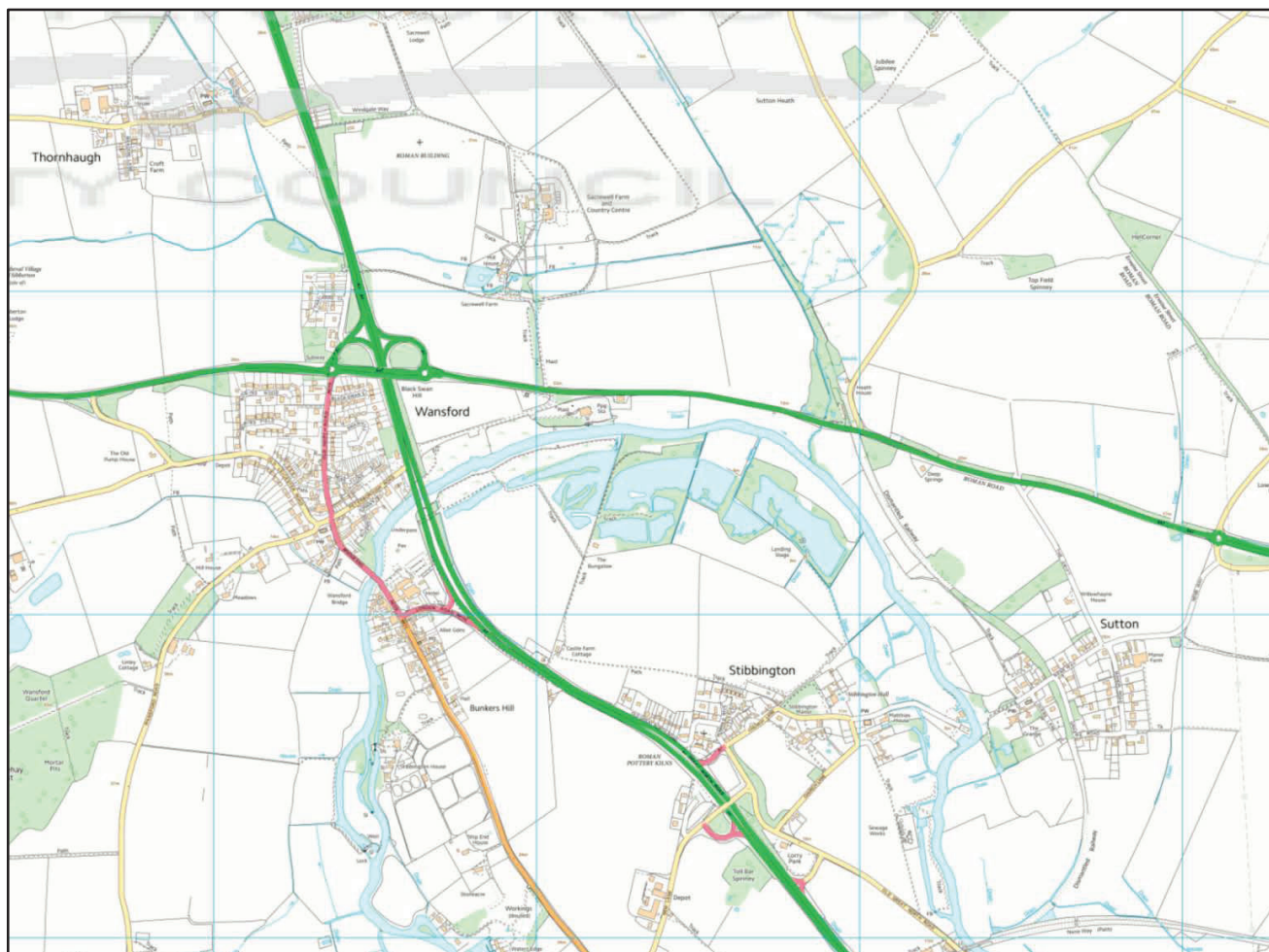
March 2018

**Wansford Parish
Council**





A47 Wansford to Sutton EIA - Scoping Report Comments



A47 Wansford to Sutton

Comments on the EIA Scoping Report

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1 Introduction

1.1 Purpose of this Document

This document has been produced by Wansford Parish Council in response to the Planning Inspectorate's letter of the 7th February 2018 inviting statutory consultees to provide input to the Scoping Opinion for the A47 Wansford to Sutton Project.

1.2 Background to the Project

The declared Aim of the Project to upgrade the A47 between Wansford and Sutton is to improve the capacity of this stretch of road, and by so doing, its resilience to disruption and its safety. In addition, Highways England (HE) has undertaken to provide improved access along the route for non-motorised users.

Wansford Parish Council (WPC) fully supports these objectives and, at a meeting with HE, the council 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.

Wansford Parish Council has particular concerns about the impact of the Project on the A1/A47 junction, the western section of which is embedded in the village, and on the high value landscape of the Nene Valley.

1.3 Progress of the Project to Date

In March and April 2017, HE carried out a non-statutory consultation on the selection of the preferred route for this Project. In August 2017, HE published the Preferred Route but gave very little explanation of how the choice was made. The only certainty is that the route selected was not that supported by the overwhelming majority of those who responded to the consultation. This response was large with 170 responses from a combined community of approximately 250 households.

Since the Preferred Route was published, WPC has made numerous requests for information to HE but the only item that has been received is a report on non-intrusive investigations of the Scheduled Monument to the north of the existing road. WPC was repeatedly told that all the requested information would be in the Scheme Assessment Report (SAR) to be published in December. By the beginning of March, the SAR has still not been published although in mid-February members of WPC received a draft copy of this document with a request not to circulate it.

The draft SAR demonstrated that the basis of the selection of the preferred route was deeply flawed with inadequate information being available and some data being misinterpreted. Had HE been more open about its decision making process and not waited 7 months to release any significant information, this matter could have been resolved quickly and considerable wasted effort avoided.



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The SAR made little comment on the Wansford Western Roundabout or the road linking this to the Eastern Roundabout. Wansford therefore still has no information on how the village itself will be affected by the Project.

These failings do not prevent the Environmental Scoping going ahead but the boundaries of the Development Consent Order (DCO) should be expanded to allow alternative alignments to be included. The DCO boundary has to take in all options for the upgrading of the A47 and its access roads within Wansford.

2 The Proposed Scheme

The Proposed Scheme described in the scoping documentation is based on the selection of Route Option 2 by HE. Unfortunately the information given is incomplete and some of it is already out of date at the time of the Scoping Consultation.

2.1 Proposed Scheme Objectives

Wansford Parish Council supports the Proposed Scheme Objectives as set out in section 2.2 of the Scoping Report but wishes to stress that all these objectives are important. The Scheme as outlined delivers support for economic growth, a safe network and a more free-flowing network.

Regrettably the Scheme will do considerable environmental damage as it will impact on the high value landscape of the Nene Valley and destroy a valuable wildlife habitat. Much has been made of the potential damage to the Scheduled Monument north of the existing road but professional advice indicates that this will be minimal¹.

The Scheme as proposed does not appear to make provision for cyclists, walkers, equestrians and other non-motorised groups.

The Proposed Scheme certainly does not represent value for money as it is at least 10% (£6 million) more expensive than the option 3 preferred by the local community. This figure is based on HE's own pricing.

It is clear that the Proposed Scheme fails three out of the six Scheme Objectives.

2.2 Proposed Scheme Description

The Proposed Scheme description indicates the intention to provide 2 traffic lanes in each direction between the Wansford west and Wansford east roundabouts. There is no indication of any modifications to the Wansford west roundabout. The configuration described would greatly increase traffic speeds into this roundabout and make it lethally dangerous for vehicles emerging from Old North Road, Wansford. WPC suggested a solution to this 8 months ago but no response has been received from HE.

¹ See "An archaeological desk-based evaluation of land along the line of the A47 road between Wansford and Sutton roundabout, to the west of Peterborough" by Stephen G. Upex Cert.Ed., B.Ed., PhD., MCIfA., FSA.

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It is not clear how the proposed access to the Wansford fuel station will be achieved.

3 Consideration of Alternatives

The presentation of the Options considered in the document is very confusing because of the lack of diagrams and we seek to clarify the matter using diagrams from HE's own publications. For the sake of brevity we have concentrated on Options 1, 2 and 3 as described in section 3.2 of the Scoping Document. These are the Options that were included in the non-statutory consultation.

3.1 Project constraints

As part of the non-statutory consultation HE published the project constraints map shown below as Figure 1.

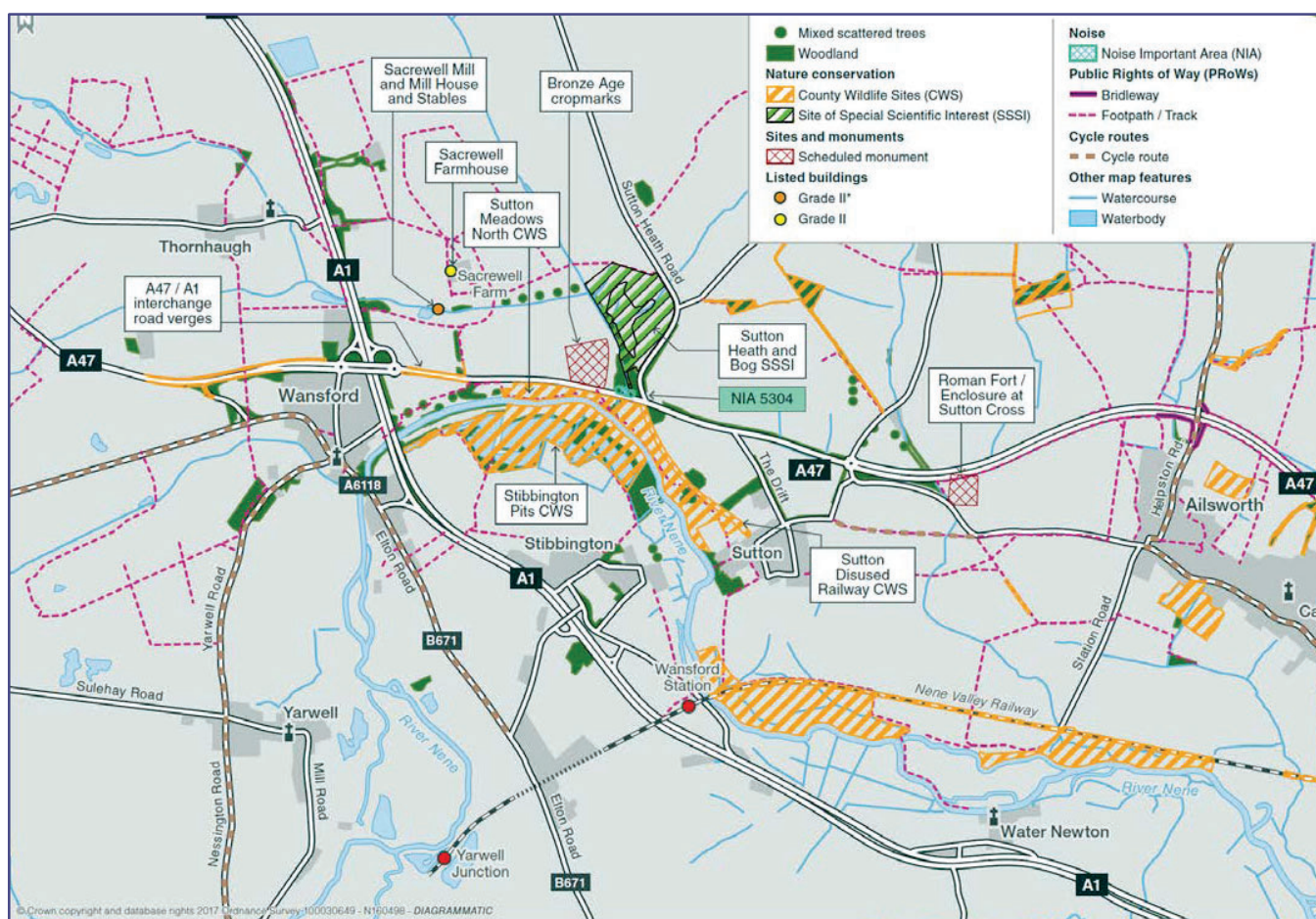


Figure 1 – HE Environmental Constraints Plan

Despite the assurance given in para 1.4.2, it is very clear that the maps shown in Appendix B of the Scoping Report does not show all the environmental constraints that apply to the Project. In particular it ignores the various designations that apply to the banks of the River Nene.

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3.2 Alternative Options

In the non-statutory consultation, HE offered three routes for the upgraded road shown in Figures 2, 3 and 4 below.

Of the three options presented, the Preferred Route was the least popular with only 13% of respondents strongly in favour. In contrast, 64% of respondents were strongly in favour of Option 3, which made it the most popular option (see Figure 25-7 at p.181 of the SAR).

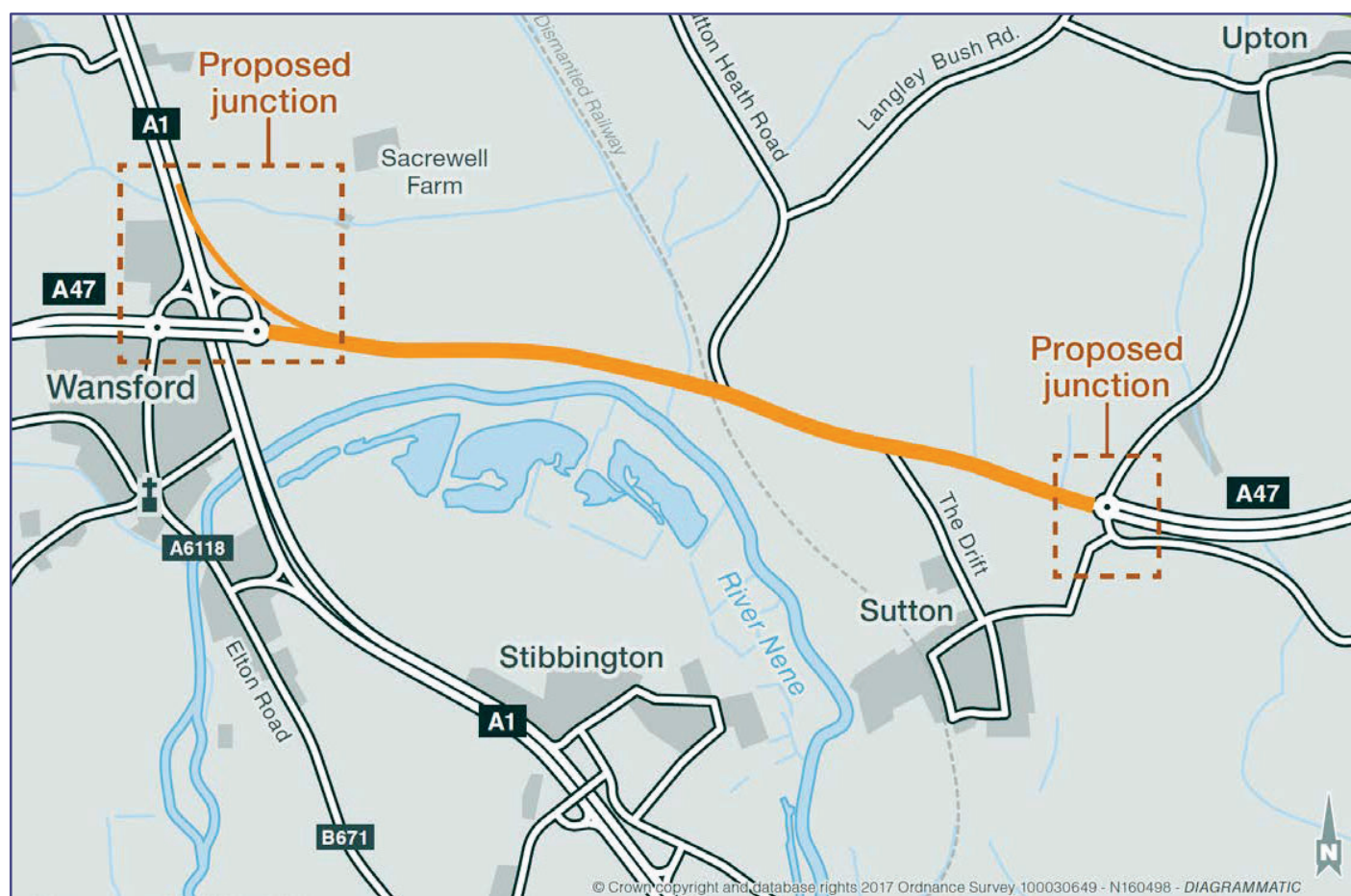


Figure 2 – HE Route Option 1

This route reused the existing road alignment and would have caused massive disruption during construction, and has made no provision for non-motorised traffic. The only merit of the scheme was to minimise land take. There was no indication how the junctions would be configured.

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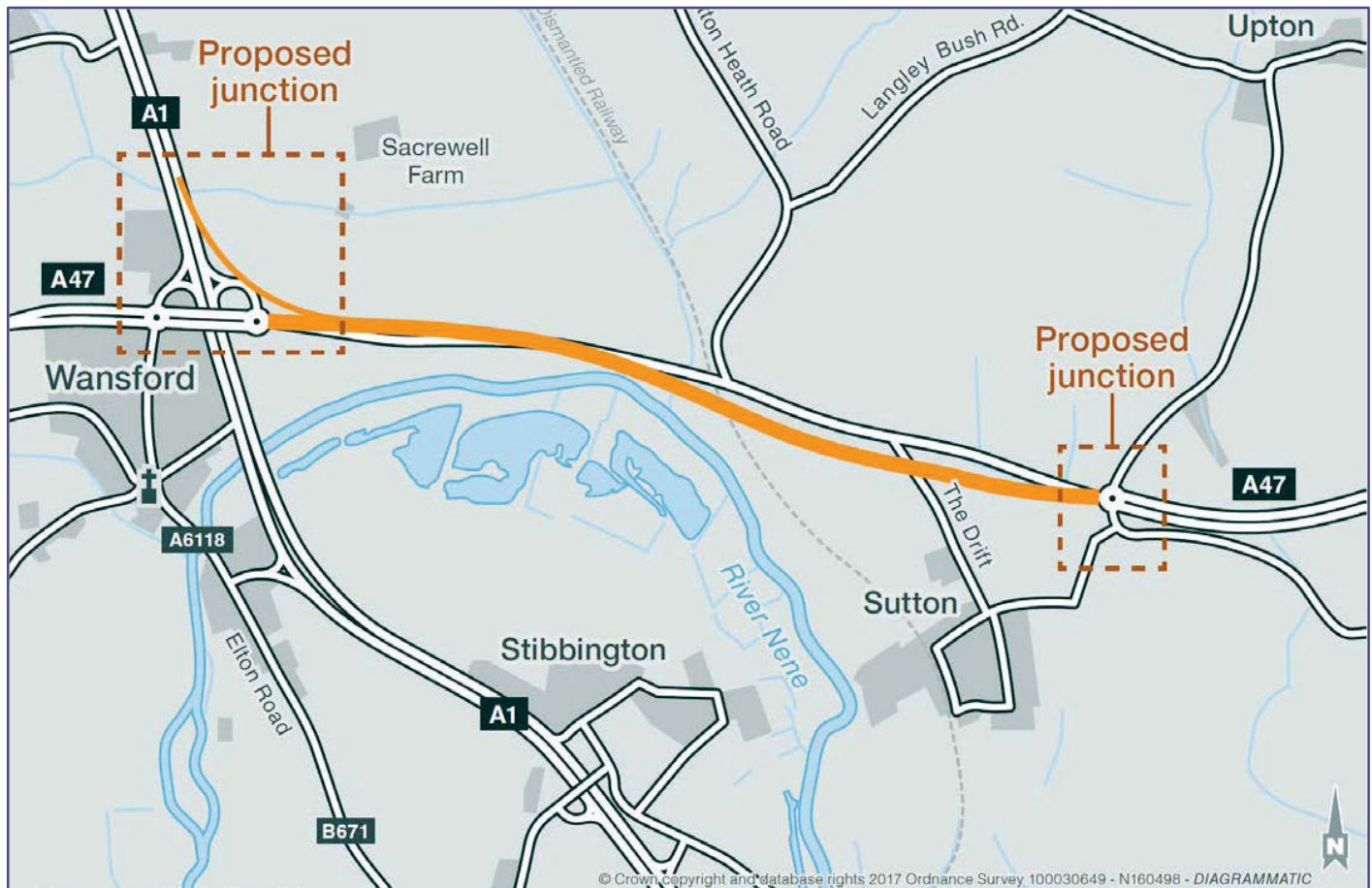


Figure 3 – HE Route Option 2

This route started off north of the existing road and then crosses to the south immediately to the west of the Scheduled Monument. This route produces the following problems:-

- Where the new road crosses the existing there will be considerable disruption.
- The road goes right through the County Wildlife Site between the A47 and the Nene.
- The County Wildlife Site is also a designated area of high landscape value.
- The slope between the A47 and the Nene is known to be unstable so there will be considerable geotechnical risk with this route. Were the road embankment to slip, as several structures in the area have previously, the river channel would be compromised.
- It will be impossible to protect the river from runoff or spills from the road.
- The banks of the Nene in this area has populations of otters, water voles and insects. All these will be displaced.
- The road goes straight through a pocket of ancient woodland.
- Professional advice is that there is likely to be considerable archaeological remains in the area between the existing road and the Nene.

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- The route involves the purchase of private land along the whole of its route.
- The route requires the purchase of one residential property, Deep Springs.
- There is no practical continuous route for non-motorised traffic.
- The long established Nene Way footpath will be disrupted.

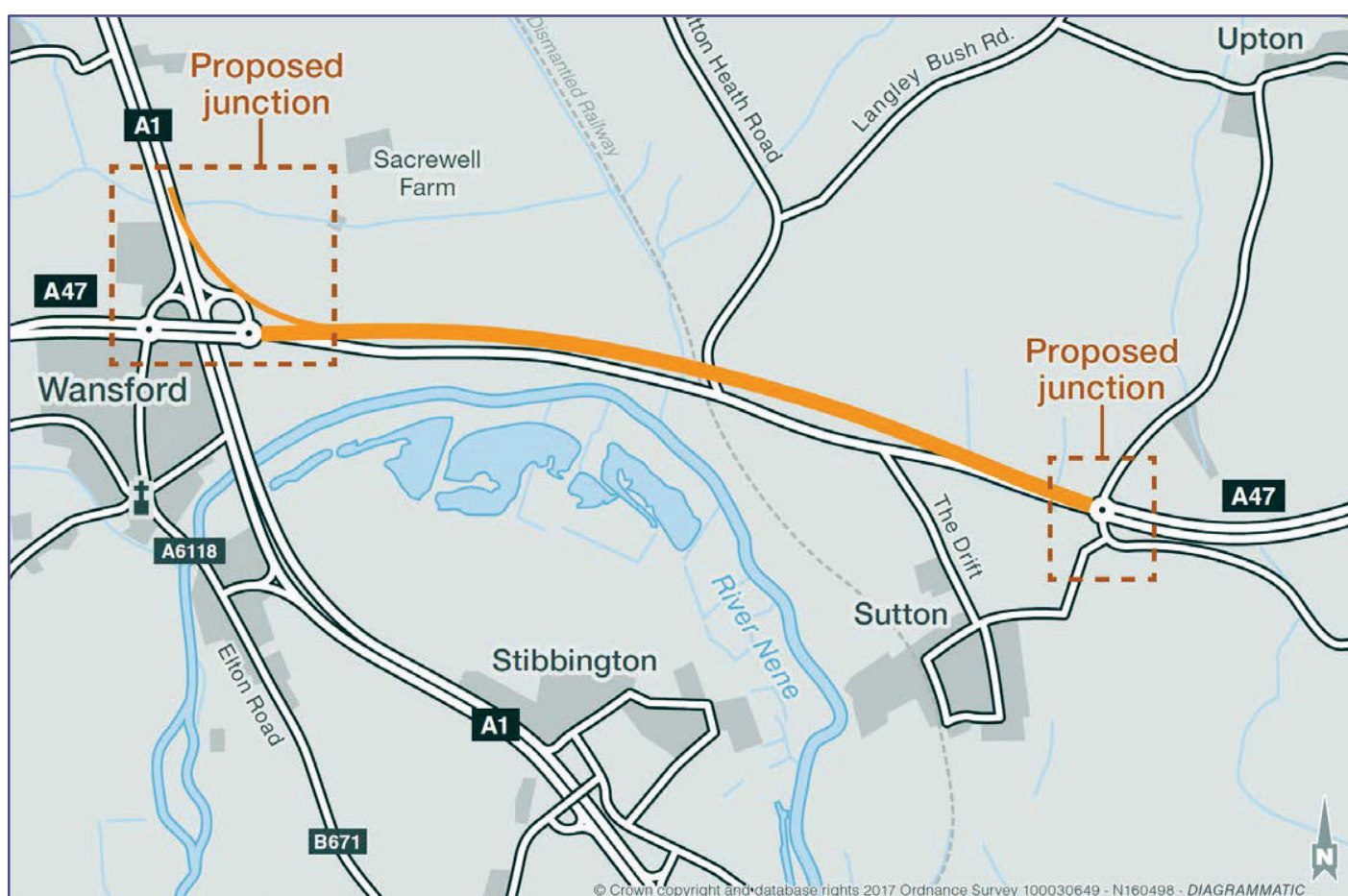


Figure 4 – HE Route Option 3

This route avoids all the environmental damage from going close to the river and, because it is completely off the existing roadline, there will be minimal disruption during construction.

If it is kept close to the existing road it does not impinge on the Sutton Heath and Bog SSSI although care will have to be taken to ensure that the drainage system is maintained.

All the land used in the eastern section of the road is already in government ownership. At one stage this was going to be part of the Castor new township but this has been removed from the Local Development Plan and is no longer under consideration.

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With an estimated construction cost at least £6 million less than the other options this route has to be value for money.

This Option was supported by the overwhelming majority of those who responded to the non-statutory consultation.

The downside of this route is that it goes through the southern edge of the Scheduled Monument to the west of Sutton Heath Road. HE appears to have rejected this option purely because of this, a constraint that was already known when it offered the Option.

When the make up of the Scheduled Monument is examined, it is clear that the new road would only touch one feature of the many on the site. This feature is thought to be a ploughed out burial mound of a type that is quite common in the area. Professional advice is that fully excavating this feature would be of greater value than preserving it in its present state. Figure 5 shows a geophysical map of the Scheduled Monument clearly demonstrating the isolated feature at the southern edge.

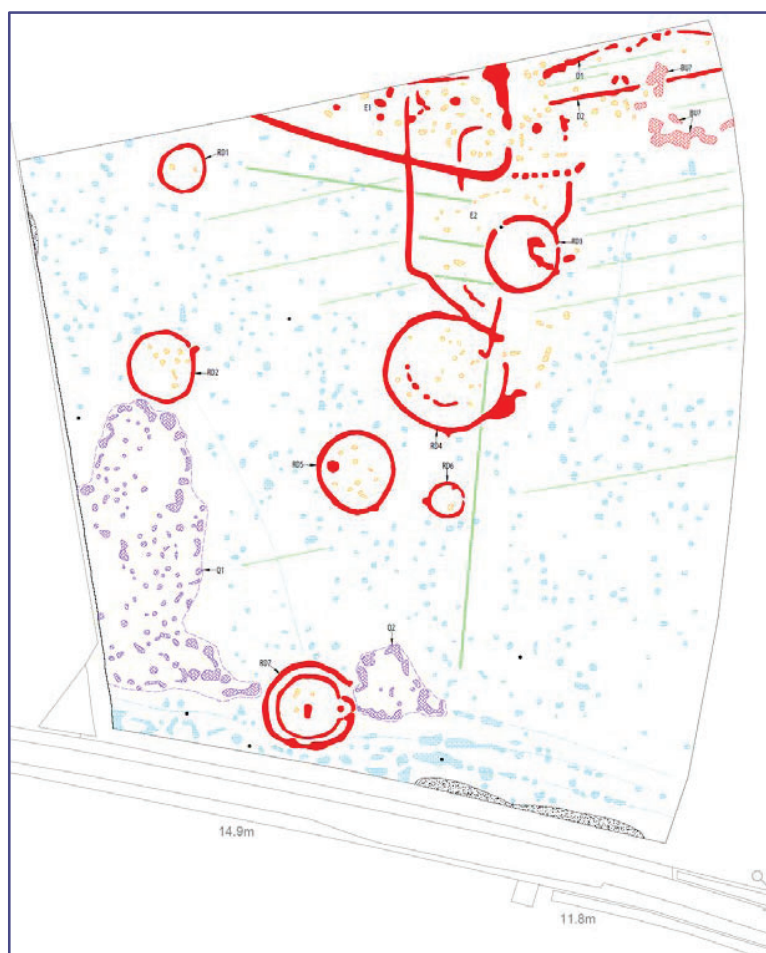


Figure 5 – Geophysical survey of the Scheduled Monument



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This route requires the purchase of one property, the Old Station Building. This is in the Peterborough City Council local list of heritage assets but is not a listed building as such. The present location of this building makes it invisible to the public. There would be the option to reconstruct is on another more visible site.

4 Consultation

HE did indeed carry out the Public Consultation described. Regrettably HE appears to have ignored the outcomes of the consultation, taking forward an option that was only supported in 13% of the responses. The Option that was supported by 64% of the respondents was rejected because it impinged on the Scheduled Monument. This was known about before the consultation so one has to question why the Option was included.

Including Options that HE already has the grounds to reject seems a strange approach to consultation.

There are grounds to believe that not all of the land owners in the effected area were consulted.

5 Air Quality

It appears that HE is basing it's entire assessment of Air Quality on two sets of monitoring results. This makes no allowance for the possibility that the monitoring may have contained an error. A sample of at least 4 monitoring instruments is needed to guard against flaws in the instruments.

It is very unfortunate that the position of the monitoring stations is on a map so small that it is not possible to see whether the locations are appropriate or may have been prejudiced by local factors.

The baseline monitoring should be repeated using enough instruments to give statistically sound results.

6 Cultural Heritage

In the Scoping Report it is stated that investigations will only be carried out along the selected route. In the light of the very significant flaws in the selection of this route it is imperative that the investigations take in the route of Option 3 as well.

Much play is made of the significance of the Scheduled Monument. The area of the Project contains numerous archaeological remains and it is clear that the boundaries of the Scheduled Monument are entirely nominal. This is clearly demonstrated at the north end of the Monument where the boundary passes through the middle of a very significant set of Roman remains. It is simply implausible that the archaeological interest is restricted to this one site.

To avoid the destruction of artefacts that may be of much greater significance than those in the Scheduled Monument it is very important that the whole of any proposed alignment is examined using the same non-intrusive techniques that were used in the Scheduled Monument. Where necessary any areas of interest should be trenched.



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To allow comparison with any features that are found elsewhere, the single feature in the southernmost part of the Scheduled Monument should also be excavated. This is a very limited area and it is already known that the feature has been deep ploughed on a number of occasions. In the area of the single feature there is the remains of a quarry but this is known to be from the modern era.

Although the Old Station House is described as a building of local importance it is, because of its hidden location, almost completely unknown to the residents of the area. 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. Heath House would not be affected by any of the likely alignments.

7 Landscape

The Preferred Route will start to the north of the existing A47 in gently undulating land. Once it crosses the A47 to the south side it will go very close to the river Nene and, because the road will be high above the river, it will have a massive impact on the visual amenity of the area. This impact will be very apparent to the many users of the Nene Way footpath if indeed the path can be accommodated between the road and the river. The area south of the river is a designated area of high landscape value, a fact that the Scoping Report ignores. The Officers at Peterborough City Council consider that it would be an act of desecration to put the road through here.

Immediately east of the old railway line, the Preferred Route would demolish the only fragment of ancient forest in the immediate area.

By comparison the Option 3 alignment traverses fairly level land and is not overlooked from any vantage points. It has been suggested that this alignment obstructs the view from the Sacrewell Centre but this is not correct. There is a rise in the ground between the two.

It is essential that both routes are evaluated to demonstrate the extent of the landscape damage done by the preferred route.

8 Biodiversity

Placing the new road very close to the River Nene will displace a well-documented population of otters and water voles, as confirmed in the Environmental Scoping. Strangely the Scoping does not mention insects, even though these are the food for many of the species referred to. The river bank is rich in insect life and this is why birds and bats are frequently seen along the river. This insect life will be destroyed by the road on the Option 2 alignment. Putting the road close to the river will cut a valuable wildlife corridor. The Option 3 route has none of these impacts.

The Peterborough City Council Ecology Officer has stated that the damage from moving the A47 closer to the River Nene would be completely unacceptable.



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There is locally gathered information to indicate that the distribution of bat roosts described is wrong.

The breeding birds survey was carried out when most birds had finished breeding.

It is important that the ecological studies are redone, preferably working with the local community who know the area well. Their knowledge will always be better than single day visits by outsiders. It is interesting that this section of the Scoping Report does not mention working with local bodies.

9 Geology and Soils

The slope down from the A47 to the river Nene is well known to be unstable. Both the Filling Station and the Anglian Water pumping station have slipped towards the river at various times. This problem was documented in 1981 in a paper by Chandler. HE were warned about this right at the beginning of the project and yet the Scoping Report makes no mention of a literature search being carried out.

Building the road close to the river will be expensive and will always carry the risk of ground movement.

The SAR document expects these problems to add £6 million to the cost of the project. The size of this additional cost makes it important that the various issues are investigated fully.

10 Materials

All the options for this road will use basically the same materials except that the preferred alignment will require the import of a large amount of high quality fill to construct the embankment. Extracting this fill will do environmental damage wherever it is extracted.

The Option 1 and 2 alignments will require the removal of substantial amounts of asphalt which then has to be treated as contaminated material.

The Option 3 alignment avoids both these problems allowing balanced cut and fill within the road corridor.

The environmental assessment must consider all these options.

11 Noise and Vibration

Moving the road closer to the river Nene will increase the levels of noise and vibration, significantly degrading the habitat for wildlife.

Any changes to the A47 close to Wansford will have a major effect on the noise and vibrations experienced by the residents of Old North Road, Black Swann Spinney and Robinswood. This was demonstrated the last time that the road was modified.



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The noise and vibration from the upgraded road must be fully investigated and the results made public before any decisions are made.

12 People and Communities

The upgrading of the A47 has the potential to improve the quality of life for the users of the road but it will have an impact on the residents of this area.

The point of maximum impact on people will be in the northern part of Wansford but this has been completely ignored both in the work done to date by HE and in the Scoping Report. HE must decide what modifications are to be made to the A1/A47 junction and then a whole new round of scoping and consultation must be carried out.

The proposed route also takes the road closer to the village of Sutton and this will have to be studied in detail and appropriate mitigation put in place.

Full provision must be made for non-motorised traffic and this can only be done by using the Option 3 alignment.

13 Road Drainage and Water Environment

The drainage from the road has the potential to pollute the River Nene and its tributaries. Normal run off will carry oil, tar and asbestos and this must be trapped and cleaned before it enters the river.

In the event of a fuel spill, and there have been several on the A47 in the last few years, the spill must be trapped before it reaches the river.

The closer the road is to the river, the greater the risks so the Option 2 route will require significantly greater study and potentially more costly mitigation measures than the other routes.

The characteristics of the Sutton Heath and Bog SSSI depend on certain drainage conditions. These will have to be carefully studied and the Scheme designed to maintain these conditions.

14 Climate

It is unlikely that climate change will have a significant effect on the scheme except that the increased incidence of extreme weather may require the storm water drainage to be upgraded.

15 Combined and Cumulative Effects

It is very important that the full combined effect of all the impacts of the road upgrade are considered. This process should not only consider mitigation measures but large scale changes to the Scheme to remove certain impacts.



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Inevitably the Scheme will cause some damage but this can be minimized by intelligent planning and design. It is important that the local community be involved in the evaluation of the impacts and mitigation. It is the local community that has to live with the results so it is only right and proper that they should be involved in the decision making.

16 Conclusions

The difficulties with this Scoping Report are:-

- There is very little information about the project on which to base any judgements. The SAR has not been officially released and there is absolutely no information on what has been planned for the A1/A47 junction close to Wansford.
- That it starts from the wrong point because it talks only about the preferred route option. It is very clear that the decision about this is flawed as it seems to be based entirely on preserving one ploughed out barrow in the Scheduled Monument. It completely ignored the impact of building close to the river Nene with its associated costs, landscape and ecological effects.

Until these issues are resolved it is difficult to analyse in detail the work that is needed to produce a satisfactory EIA.

If an EIA is to be started immediately after this scoping, the only satisfactory approach is to increase the area of the DCO site boundary to allow for other options in the road alignment and for a range of solutions for the A1/A47 junction.

Author,

Cllr Richard Clarke. MA(Cantab) C Eng MICE

for and on behalf of Wansford Parish Council.