

A47 Wansford to Sutton Dualling

Scheme Number: TR010039

Volume 9

9.15 Applicant's Comments on Peterborough City Council's Local Impact Report

Infrastructure Planning (Examination Procedure) Rules 2010
Rule 8(1)(c)

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**The Infrastructure Planning
(Examination Procedure) Rules 2010**

**A47 Wansford to Sutton
Development Consent Order 202[x]**

**9.15 APPLICANT'S COMMENTS ON PETERBOROUGH
CITY COUNCIL'S LOCAL IMPACT REPORT**

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CONTENTS

1	INTRODUCTION.....	4
2	COMMENTS ON LOCAL IMPACT REPORT	5

1 INTRODUCTION

- 1.1.1 The Development Consent Order (DCO) application for the A47 Wansford to Sutton Scheme was submitted on 5 July 2021 and accepted for examination on 02 August 2021.
- 1.1.2 The purpose of this document is to set out National Highways' (the Applicant) comments on Peterborough City Council's Local Impact Report (**REP2-068**).

2 COMMENTS ON LOCAL IMPACT REPORT

Reference	Written Representation	Applicant's Response
1	<p>1. Introduction</p> <p>This Local Impact Report (LIR) has been prepared by Peterborough City Council (PCC) in accordance with the advice and requirements set out in the Planning Act 2008 (as amended). The sole definition of an LIR is given in s60(3) as, 'a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)'. This provides a means for Local Planning Authorities to present knowledge and evidence of local issues in a full and robust report to the Examining Authority. This report is based on the existing local knowledge of Council Officers.</p> <p>The content of the LIR is a matter for the local authority concerned as long as it falls within this statutory definition.</p> <p>In preparing this LIR the local authority has had regard to the DCLG's Guidance for the examination of applications for development consent (2015) and the Planning Inspectorate's Advice Note One, Local Impact Reports (2012).</p> <p>In producing a LIR, the local authority is not required to carry out its own consultation with the community as parish councils, organisations and members of the public are able to make representations directly to the Planning Inspectorate as "interested parties" so that their comments about the scheme will be considered by the Examining Authority. Therefore the views of local interest groups have not been sought specifically for the purposes of this report.</p>	<p>No response required.</p>

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2	<p>2. Peterborough Context</p> <p>Peterborough is a unitary authority located in the East of England, approximately 125 kilometres (80 miles) north of London. It comprises the City of Peterborough itself, and 25 villages set in countryside extending over an area of approximately 344 square kilometres. The area borders the local authorities of Fenland, Huntingdonshire, East Northamptonshire, Rutland, South Kesteven and South Holland.</p> <p>Peterborough is situated on the very edge of the Fens. To the east of the City, the fenland landscape is flat and open, with the villages of Eye and Thorney on islands of higher ground and a settlement pattern of dispersed hamlets and farms. To the west and north, the shallow river valleys of the Nene and Welland give way to an undulating limestone plateau, with a denser pattern of attractive stone villages. Historic houses and their grounds, like Burghley and Milton, feature prominently in the landscape, as does the RAF base at Wittering, beside the A1 towards the western edge of the area.</p> <p>There is a long history of settlement in Peterborough, with evidence from the Bronze Age remains at Flag Fen. The Norman Cathedral still stands at the heart of the modern city. Peterborough is an important regional centre, providing employment, shopping, health, education and leisure facilities for people across a wide catchment area.</p> <p>In addition to its important built heritage, the area contains a rich biological diversity. There are two Special Areas of Conservation (Orton Pit and Barnack Hills & Holes); part of a Special Protection Area and Ramsar site (Nene Washes); three National Nature Reserves (Castor Hanglands, Bedford Purlieus and Barnack Hills & Holes); five Local Nature Reserves; and a</p>	No response required.

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	<p>large number of Sites of Special Scientific Interest and other County Wildlife Sites.</p> <p>Peterborough has a diverse economy, ranging from innovative small business to large global headquarters.</p> <p>Peterborough is situated in a prime location beside the (north-south) A1 and (east-west) A47. The City of Peterborough continues to grow with urban extensions at Hampton and Cardea and the urban extension at Great Haddon.</p>	
3	<p>3. Details of the proposal</p> <p>In summary the scheme proposes the following key elements:</p> <ul style="list-style-type: none"> • Approximately 2.6km of the section of the A47 between the Wansford junction with the A1 and the Nene Way roundabout near Sutton is to be upgraded to dual-carriageway standard, including the construction of two new underpasses. • a new free-flow link road connecting the existing A1 southbound carriageway to the new A47 eastbound carriageway. • a new link road from the Wansford eastern roundabout to provide access to Sacrewell Farm, the petrol filling station and the Anglian Water pumping station. • closure of the existing access to Sacrewell Farm with a new underpass connecting to the farm from the link road provided. • a new slip road from the new A47 westbound carriageway also providing access to the petrol filling station. • a link road from the new A47 Sutton Heath roundabout, linking into Sutton Heath Road and Langley Bush Road. • new junction amendments for access to Sutton Heath Road and Langley Bush Road. 	<p>These details do not appear to state the full description of the project. The correct project description is stated in Section 2.5 of Environmental Statement (ES) Chapter 2 The Proposed Scheme (REP2-008).</p>

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	<ul style="list-style-type: none"> • closure of the existing access to the A47 from Sutton Heath Road, Sutton Drift and Upton road • new passing places and limited widening along Upton Drift Road (also referenced as Main Road) • a new walking and cycling route connecting Wansford to Sutton. This includes a new underpass at the disused railway to connect to Sutton Heath Road. • new safer access to the properties on the A1, north of Windgate Way. 	
4	<p>4. Relevant Development Proposals There are no other planning applications or other proposals in the district which are directly relevant to the proposal.</p>	This is noted.
5	<p>5. Policy Framework The following polices of the adopted Peterborough Local Plan (2019) are considered to be of relevance: Policy LP1: Sustainable Development and the Creation of the UK's Environment Capital Policy LP7: Health and Wellbeing Policy LP11: Development in the Countryside (part F) Policy LP13: Transport Policy LP16: Design and the Public Realm Policy LP17: Amenity Provision Policy LP19: The Historic Environment Policy LP22 Green Infrastructure Network Policy LP24: Nene Valley Policy LP27: Landscape Character Policy LP28: Biodiversity and Geological Conservation Policy LP29: Trees and Woodland Policy LP32: Flood and Water Management Policy LP33: Development on Land Affected by Contamination</p>	<p>The Scheme complies to these policies as detailed below:</p> <ul style="list-style-type: none"> • Policy LP1: Sustainable Development and the Creation of the UK's Environment Capital - There has been stakeholder consultation, including community engagement, throughout the development of the Scheme, to promote a Scheme that is socially sustainable. <p>As shown in the Case for the Scheme (AS-022) there is a need for the Scheme as the A47 is an important route for both commuter and longer distance east/west traffic. It forms part of the Strategic Road Network (SRN) between Yarmouth on the east coast and the A1, connecting Norwich and Peterborough and the towns and villages between. The rapid economic growth along this corridor is expected to</p>

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		<p>continue with continuing implications for traffic growth.</p> <p>The objectives of the Scheme align with this policy, they are:</p> <ol style="list-style-type: none"> 1. Supporting economic growth - The Scheme will improve journey times and journey time reliability. This will help contribute to sustainable economic growth by providing benefits such as effectively bringing businesses closer together and encouraging more people to join the labour market as a result of reduced commuting costs. 2. Making a safer network - Improving road safety for all road users by designing to modern highway standards appropriate for a major A road. 3. Providing a more free-flowing network - Increasing the resilience of the A1 / A47 junction to cope with incidents such as collisions, breakdowns, maintenance and extreme weather. The improved A47 section from Wansford to Sutton will be more reliable, reducing journey times and providing capacity for future traffic growth. 4. Creating an accessible and integrated network - Ensuring the proposals take into account the local communities access to the road network, and provide a safer route between the communities for walking, cycling, horse-riding and other road users.

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		<p>PCC have stated in Section 6 of the LIR that: <i>“The principle of the proposed scheme is supported. The dualling the A47 will help to boost the economic prosperity of Peterborough and the regional economy as well as helping to deliver our planned growth.”</i></p> <ul style="list-style-type: none"> • Policy LP7: Health and Wellbeing - ES Chapter 12 Population and human health (REP2-016) shows that during construction, there are not likely to significant effects on local communities with mitigation in place. Overall, impacts on population and human health are predominantly non-significant once the Scheme is operational. For those travelling by vehicle to access properties, businesses and community assets using the Scheme by vehicle, benefits would be experienced in terms of safety for road users. • Policy LP11: Development in the Countryside (part F) - The construction of the Scheme results in the permanent and temporary land-take of Grade 2 and Grade 3a land, which is considered to be BMV agricultural land, as well as Grade 3b land. A Soil Management Plan (SMP) will be developed to help preserve land quality on the temporary land take areas and to make effective reuse of the soils taken from the areas of permanent land-take. Long-term residual effects on agricultural soils will consist of the permanent loss of agricultural land. Provided that the mitigation and monitoring measures are effective, and areas of temporary land-take are restored back to their former condition, the long-term residual effects

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		<p>on agricultural soils would be limited to the permanent loss of agricultural land.</p> <p>During operation residual effects have been identified to be neutral for the operation of the Scheme.</p> <p>There is in sufficient lower grade land available and the impacts of the proposal upon ongoing agricultural operations have been minimised through the use of appropriate design solutions, therefore the Scheme accords with this policy.</p> <ul style="list-style-type: none"> • Policy LP13: Transport - The Case for the Scheme (AS-022) demonstrates that the dualling of the A47 and relief of the impacts of congestion on productivity, as part of a package of infrastructure measures, is critical to this delivery. The Local Transport Plan also emphasises the interrelationship between the region's transport objectives and the delivery of wider goals relating to the economy, society and environment. <p>The Scheme provides support to walking, cycling and vulnerable users of the footpath/road network by incorporating safe, convenient, accessible and attractive routes for pedestrians and cyclists. The Scheme will upgrade and realign the A47 with a section of the existing A47 alignment de-trunked to local road status and a section closed to vehicular traffic. This will allow safer passage along the route, away from the upgraded A47 dual carriageway</p>

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		<p>The Applicant has considered the merits of this policy in various documents submitted as part of this application including Traffic Regulations Plans (APP-013), Outline Traffic Management Plan (REP2-029), and the Transport Assessment (REP2-025).</p> <p>Given the overall benefits of the Scheme, its compliance with national, regional and local transport policy and the fact that it achieves its stated objectives, the Scheme aligns with this policy. Again, PPC have said that the principle of the proposed scheme is supported in Section 6 of the LIR.</p> <ul style="list-style-type: none"> • Policy LP16: Design and the Public Realm - ES Chapter 7 Landscape and visual effects (APP-045) considers the effect of the Scheme on landscape character within the study area, including the direct impact on existing landscape features within the Scheme boundary such as: vegetation (woodlands, trees and hedgerows); and landform; the field pattern; or hydrological features such as the River Nene. Impacts are mitigated as much as possible. <p>The Scheme complies to the other requirements of this policy b) to i), for example the Scheme provides support to walking, cycling and vulnerable users of the footpath/road network by incorporating safe, convenient, accessible and attractive routes for pedestrians and cyclists.</p> <ul style="list-style-type: none"> • Policy LP17: Amenity Provision -

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		<p>ES Chapter 7 Landscape and Visual (APP-045) concludes that the Scheme would not result in a significant long term residual effect on overall landscape and visual amenity. While a small number of visual receptors would experience a residual adverse (albeit not significant) visual effect, this would be a relatively limited change.</p> <p>ES Chapter 12 Population and human health (AS-016) states that with mitigation in place, impacts on population and human health are not expected to be significant.</p> <p>Therefore the Scheme adheres to this policy.</p> <ul style="list-style-type: none"> • Policy LP19: The Historic Environment – The Applicant undertook a heritage assessment which can be found in ES Chapter 6 Cultural Heritage (REP2-010). The impact of the Scheme on heritage assets is considered to be in accordance with local and national planning policy. • Policy LP24: Nene Valley - The landscape setting and the river valley have been considered throughout the development of the Scheme. After reviewing the feedback following the consultation, the Scheme was moved away from the Nene Valley and moved as close as possible to the southern edge of the existing A47 at the eastern end of the Scheme in order to protect it during the development of the scheme, as highlighted in the Case for the Scheme (AS-022). Where the Nene Valley is impacted, the ecological impacts are

Reference	Written Representation	Applicant's Response
		<p>mitigated where possible, as shown in ES Chapter 8 Biodiversity (AS-015).</p> <ul style="list-style-type: none"> • Policy LP27: Landscape Character – The impact of the Scheme on landscape character areas, including the distinctiveness of the Nene Valley landscape character area have been assessed during the development of the Scheme as discussed in ES Chapter 7 Landscape and Visual Effects (APP-045). <p>DMRB LA 107 requires that the combined effect of the Scheme on landscape and visual amenity as a whole is to be assessed independently and the outcome combined into a single conclusion on the overall likely significance of effect. Having considered the residual (Year 15) landscape and visual assessments of effect, this assessment concludes that overall, combining both landscape and visual effects, the Scheme would not, overall, result in a significant long term residual effect on overall landscape and visual amenity. It is acknowledged that a small number of visual receptors would experience a residual adverse (albeit not significant) visual effect, however in the context of the overall Proposed Scheme this would be a relatively limited change. Therefore it is considered that the Scheme adheres to his policy.</p> <ul style="list-style-type: none"> • Policy LP28: Biodiversity and Geological Conservation - Policy LP22 Green Infrastructure Network <p>The Applicant notes that Peterborough City Council clarifies in Section 8 of the LIR that: <i>“Whilst the scheme will have impacts on biodiversity and habitats, subject to further clarification on the proposed</i></p>

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		<p><i>mitigation and compensation the proposal would comply with policies LP22 and LP28 of the adopted Peterborough Local Plan."</i></p> <ul style="list-style-type: none"> • Policy LP29: Trees and Woodland - The ES documents demonstrate the Scheme's compliance with the policy in conserving the natural environment. <p>No trees surveyed are within a Conservation Area (CA), as shown in the Environmental Statement: Arboricultural Impact Assessment Appendix 7.6 (REP2-022). The design has evolved with the aim of avoiding trees where possible and habitat loss kept to the minimum. The Environmental Masterplan (AS-021) shows the current proposals for tree planting.</p>
	<p>6. Traffic and transport The principle of the proposed scheme is supported. The dualling the A47 will help to boost the economic prosperity of Peterborough and the regional economy as well as helping to deliver our planned growth. Peterborough's Local Plan, which was adopted in July 2019, sets out the overall vision, priorities and objectives for Peterborough for the period up to 2036. The strategy identifies the required delivery of 21,315 new homes and 17,600 new jobs between 2016 and 2036.</p> <p>The population of Peterborough has grown considerably over recent years and we are one the UK's top cities for population growth, making us one of the UK's fastest growing cities. We are also a member of the A47 Alliance, a collaboration of a variety of business leaders, politicians, local authorities from Peterborough, Norfolk, Cambridgeshire, Lincolnshire and Suffolk, who have come together to make the case for a fully</p>	<p>These comments are noted.</p>

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	<p>dualled A47.</p> <p>We want the A47 Wansford to Sutton dualling and do not have any technical engineering objections to the plans. A critical issue with this scheme has been access to the village of Upton and we are pleased that the applicant has been undertaking meaningful dialogue with the village in recent months. It is important that the right mitigation is put in place to ensure that Upton are not negatively impacted upon by this scheme.</p>	
	<p>The majority of the technical issues have been addressed through the informal consultation process. However, there remains the need for some clarity relating to the severing of Sutton Heath Road and how the resulting dead end (for motorists) will be best used once the dualling has been completed.</p> <p>The approach seems unclear as different documents seem to reference either simply gating it off to provide pedestrian, cyclist and landowner use, or stopping up the land in question.</p> <p>The Local Highways Authority is content that a suitable solution can be reached however there will be a requirement for an agreement that will best suit the general public and not attract anti-social behaviour.</p>	<p>Please refer to Applicant's response to RR-036-3 in the Applicant's Response to Relevant Representations (REP1-010).</p>
	<p>Rights of Way The creation of new routes between Wansford and Sutton and the new link under the A47 toward Sutton Heath Road using the old railway bridge is welcomed.</p>	<p>This comment is noted.</p>
	<p>Confirmation is required as to who will be responsible for the <u>maintenance of these new routes and adjacent verges.</u></p>	<p>Please refer to Applicant's response to RR-036-5 in the Applicant's Response to Relevant</p>

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	<p>Drawing no TR010039/APP/2.4 and HE551494-GTY-HKF-000-DR-CH-31006 shows areas of stopped up highway with a cycleway along it. Confirmation is required as to who would be responsible for the maintenance of the shared cycleway and adjacent verges.</p>	<p>Representations (REP1-010).</p> <p>The Applicant will be responsible for the new Walking Cycling and Horse Riding (WCH) routes that form part of the Scheme and are within the National Highways boundary once the Scheme is complete. Where new routes fall outside these areas, requirements for the maintenance of the new routes and adjacent verges, as shown in the Rights of Way and Access Plans (REP2-004) will be agreed with Peterborough City Council and agreements will be outlined in a Statement of Common Ground which is 'In draft' (see the Statement of Commonality (TR010039/EXAM/8.1).</p> <p>With regards to the Rights of Ways and Access Plans (REP2-004) (drawing No. HE551494-GTY-HKF-000-DR-CH-31006), the Applicant will maintain the stopped up A47 highway and subsequent cycle track along it (C7/A5). Where the Sutton Drift is stopped up (A6/SU18/ SU19), it is expected that Peterborough City Council will continue to maintain this area along with the Sutton side road and cycle track (SU17).</p>
	<p>The new link to Sacrewell under the new road access should be available 24 hours a day for pedestrians as this forms a part of the long distance path known as the Hereward way.</p>	<p>Please refer to Applicant's response to RR-036-6 in the Applicant's Response to Relevant Representations (REP1-010).</p>
	<p>The existing bridges on the public right of way from Sutton to Wansford should be replaced/upgraded to accommodate increased use of the routes.</p>	<p>Please refer to Applicant's response to RR-036-8 in the Applicant's Response to Relevant Representations (REP1-010).</p>
7	7. Cultural Heritage	Substantial harm is predicted for the Former Wansford

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	<p>Policy LP19 (The Historic Environment) of the adopted Peterborough Local Plan advises that development should protect, conserve and enhance where appropriate the local character and distinctiveness of the area particularly in areas of high heritage value.</p> <p>Unless it is explicitly demonstrated that a proposal meets the tests of the NPPF permission will only be granted for development affecting a designated heritage asset where the impact would not lead to substantial loss or harm. Where a proposal would result in less than substantial harm this harm will be weighed against the public benefit.</p> <p>In the case of application sites which include, or could potentially include, heritage assets with archaeological interest, designated or non-designated, the council will require the developer to carry out a preliminary desk-based assessment. If this does not provide sufficient information, developers will be required to undertake a programme of field evaluations.</p>	<p>Road Railway Station (WAN1). The NPSNN is the relevant planning policy for the Proposed Scheme. Substantial harm is addressed in section 5.131 of the NPSNN and relates only to designated heritage assets. As a locally listed building, the asset is a non-designated heritage asset (NPPF annex 2) and so the application does not require to meet the tests set out in the NPPF. However, the effect on the asset has been taken very seriously in the assessment and in the development of the proposed design. PCC have been included in discussions throughout the assessment process.</p> <p>Both desk-based assessments (REP2-010 and APP-085) and field evaluations (APP-086 through APP-090) have been undertaken and incorporated into the application.</p>
	<p>Archaeology The applicant has submitted a Heritage Statement as part of the ES (APP-044). The assessment has considered effects on designated and non-designated heritage assets.</p> <p>The proposed road scheme will cross areas of known archaeological significance, with particular reference to the evidence for prehistoric, Roman and early medieval activity. The road will also skirt and partly bisect Scheduled Monument NHLE Ref: 1006796 - Cropmark site of a barrow cemetery and a quadrilateral ditched enclosure, together with pits and a pit alignment, approximately 837m southeast of Sacrewell Farmhouse.</p>	<p>No response required.</p>

Reference	Written Representation	Applicant's Response
	<p>There are no major concerns in principle with the proposed scheme. However, the route entails the destruction of part of the southernmost portion of the Scheduled Monument. In consultation with Historic England, a programme of strip-map-record must be implemented in accordance with an approved WSI.</p>	<p>Mitigation proposals have been included in Record of Environmental Actions and Commitments (REAC) commitments CH2, 3, 5 and 6 within the Environmental Management Plan (EMP) (REP2-027).</p>
	<p>The programme of archaeological work has not been completed, namely targeted area excavations, including the area of the SM which will be obliterated. As it stands, based on the available evidence, it is difficult to assess significance with a reasonable degree of confidence.</p>	<p>Mitigation proposals have been included in REAC commitments CH2, CH3, CH5 and CH6 within the EMP (REP2-027). Detailed proposals (the detailed heritage mitigation strategy) will be developed in consultation with PCC post-determination. The Applicant acknowledges that, short of full excavation of the entire Scheme footprint, complete confidence is impossible to achieve. However, commitment to appropriate monitoring of archaeological mitigation works (REAC commitment CH8), protocols for unexpected finds (REAC commitment CH 7) and preservation in-situ where appropriate (REAC commitment CH5) are considered sufficient to provide confidence that works will respond appropriately to significance.</p>
	<p>In addition, the results of the archaeological fieldwork have not been included in the heritage assessment, despite claims that these have been considered. As a result, the passement simply lists a series of entries in the Historic Environment Record (HER). The problem stems from the definition of 'non-designated heritage assets' which is still surrounded by controversy. Historic England is looking into it. Regardless of the definition, for the sake of consistency, the results of the geophysical survey and trial trenching should have been integrated to make the Zoning more meaningfully. There are outstanding areas of the revised route and there are now Zones</p>	<p>Results of archaeological fieldwork are included in whole as ES Appendices 6.2 to 6.6 (APP-086 to APP-090), in summary in section 6.6.72 to 6.6.79, 6.8.13 and Table 6.6 of the ES Chapter 6 Cultural Heritage (REP2-010). Results of all investigations as well as previously known assets were used in the drafting of the archaeological zones. Limitations of investigation are discussed in Section 6.8.13 (bullet 7) of ES Chapter 6 Cultural Heritage (REP2-010). Zoning of mitigation will be undertaken in development of the detailed heritage mitigation strategy in consultation</p>

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	<p>which have not been investigated.</p>	<p>with PCC and Historic England and will also consider all sources of information.</p> <p>Table 6.2 of ES Chapter 6 Cultural Heritage (REP2-010) states that non-designated assets can be of up to Very High value/sensitivity. Most of the archaeological zones are assessed as of Medium value/sensitivity, putting them level with some designated assets. Zone 2 is assessed as of Medium value/sensitivity with potential for (non-designated) remains of up to high value, which would put them on the same level as the scheduled monument and grade I and II* listed buildings.</p> <p>Individual features were not given new asset numbers due to the large number of features identified from the various works. Also, the relationships between them will be explored during mitigation works, clarifying which belong together as discrete assets. The decision to classify and group individual features can be taken by the Peterborough Historic Environment Record on completion of mitigation works.</p>
	<p>Built Environment The Chapter 7 [APP-044] of the Environmental Statement lists the Heritage Assets which may be potentially affected by the proposals and there is general agreement regarding those assets which have the greatest potential to materially impact by the proposals.</p>	<p>This is noted.</p>
	<p><u>Mile Marker</u> The mile marker currently situated on the north verge of the A47, slightly to the east of the petrol station. As an asset which is intrinsically linked with the road the mile marker must be</p>	<p>Please refer to Applicant's response to RR-036-18 in the Applicant's Response to Relevant Representations (REP1-010).</p>

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	<p>conserved during construction works, with a management plan in place. Subsequent to the work being completed the mile marker must be re-laid as close to its original position as possible on the northern side.</p>	
	<p>Conservation Areas There are four Conservation Areas which are within close proximity of the proposed site, Ailsworth, Sutton, Thornhaugh and Wansford. With regard Ailsworth it already abuts the dual carriageway section of the A47 which forms its northern border and the extension of the dual carriageway is not considered to materially impact it further.</p>	<p>This is noted.</p>
	<p><u>Thornhaugh Conservation Area</u> In terms of Thornhaugh Conservation Area, the existing A1 is considered to form a sufficient barrier that the proposals, which at nearest points are limited will not be materially impactful.</p>	<p>This is noted.</p>
	<p><u>Wansford Conservation Area</u> No assessment of the impact upon the setting of the Wansford Conservation Area has been undertaken. Whilst no works are to be carried out within the boundary of the Conservation Area, substantive alterations will be 100m away.</p> <p>The by-passing of the village by the A1 has created a substantial barrier to the proposed site from the Conservation Area. As such the relationship between the two is no longer significant and the magnitude of the works within what is already an enclosed space, is not sufficient to be a materially detrimental impact upon the setting of the Wansford Conservation Area.</p>	<p>This is noted.</p>
	<p><u>Sutton Conservation Area</u></p>	<p>Please refer to Common Response C in the</p>

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	<p>Sutton has over the course of the 20thC become more isolated as a village due to the loss of the active ford and the upgrading of the A47. The proposals stop the active usage of The Drift, the historic main access.</p> <p>There is a clear preference for historical accesses to be maintained and there does not appear to be any justification in this instance for its truncation, considering that the route will be maintained but just blocked. It is recommended that the blocking of the access be removed from the proposals.</p>	<p>Applicant's Response to Relevant Representations (REP1-010).</p>
	<p>If access it blocked it is essential the manner in which access is denied does not undermine the clear appreciation of The Drift as the main and historical access. In addition the works should not undermine the holistic maintenance of the tree avenue. The existing A47 is heard from the otherwise quite tranquil village and is partially visible in northward views. These existing aspects of the A47 are considered to have a limited detrimental impact upon the setting of the Conservation Area. The proposal will to a limited extent exacerbate the existing detrimental aspects, however, due to the landscaping and distance these impacts and not considered materially detrimental.</p>	<p>Please refer to Common Response C in the Applicant's Response to Relevant Representations (REP1-010).</p>
	<p>Model Farmhouse The proposals do not materially impact the setting of the Grade II Listed building. It has been raised that the curtilage listed northern wall could potentially be structurally impacted as a consequence of the carrying out of the works. The mitigation measure of a structural survey and a construction risk assessment as has been suggested are considered prudent and reasonable.</p> <p>If resulting from the assessment it is deemed that the wall requires substantive preventative measures, there would be an</p>	<p>Please refer to Applicant's response to RR-036-23 in the Applicant's Response to Relevant Representations (REP1-010).</p> <p>A Level 2 record is proposed as part of REAC commitment CH4 within the EMP (REP2-027) as a minimum. However, should further information or risks come to light, an appropriate response will be agreed with PCC as set out in commitment CH8. It is possible that an appropriate response could include adding to</p>

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	<p>expectation of a Level 2 Historical Building Recording of the wall prior to works being carried out. If the wall is considered to be unstable and requires substantive rebuilding, then a Level 3 Historical Building Recording with a laser scan would be expected.</p>	<p>the Level 2 record with a laser scan, yet still fall outside the strict definition of a Level 3 record.</p>
	<p>Railway Buildings The proposals require the demolition of the Locally Listed Sutton Station. Locally Listed buildings are NDHA's for the purposes of NPPF paragraph 203 for which balanced judgment regarding the scale of the harm on the asset is required. As such the total loss is considered to be less than substantial harm.</p> <p>There is a presumption in favor of the retention in situ and viable for future use of Locally Listed Heritage Assets. The existing building is considered viable with no identified structural deficiencies identified and as such there is a principle objection to this proposal.</p> <p>It is understood however that due to other constraints which are hierarchically more significant for which the resulting alignment has been designed to avoid, this has given rise to a need to demolish the Locally Listed Building. Although it would be possible for only partial demolition, the proposed mitigation of allowing the relocation of the station is considered preferable as this would also mitigate the impact of the loss of the station building.</p> <p>In terms of mitigation there is agreement with the suggestion for Historic Building Recording and its proposed extent, however, there is disagreement with the proposed level 3. As the relocation would break up the collection of Locally Listed railway buildings, a Level 4 Building Recording should be</p>	<p>Please refer to Common Response G in the Applicant's Response to Relevant Representations (REP1-010).</p> <p>The gate piers are included in the mitigation proposals in ES sections 6.8.6 to 6.8.9 (REP2-010) and REAC commitment CH4 within the EMP (REP2-027).</p>

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	<p>undertaken upon the former Station Building. The main difference between the two levels is the extent of research which would be required and this information would be essential for the buildings interpretation going forward.</p> <p>There is no further information regarding the future treatment of the gate piers. These should if possible be reused on the site, however if this is not practical they should remain with the station.</p>	
8	<p>8. Biodiversity Policy LP22 (Green Infrastructure Network) advises that the Council will seek to maintain and improve the existing green infrastructure network in Peterborough. This will be achieved by enhancing, creating and managing multi-functional green infrastructure, within and around settlements, that are well connected to each other and the wider countryside, and which reflect the broad strategic framework set out in the Green Infrastructure and Biodiversity SPD.</p> <p>Strategic and major development proposals should incorporate opportunities for green infrastructure provision, to reverse the decline in biodiversity and restore ecological networks at a landscape scale, reverse habitat fragmentation and increase connectivity of habitats, and to preserve, restore and create priority and other habitats within and adjacent to development schemes.</p> <p>Proposals will be expected to provide clear arrangements for long term maintenance and management. Development must protect existing linear features of the green infrastructure network. Proposals which would cause harm will not be permitted unless the need for and benefits of the development demonstrably outweigh any adverse impacts.</p>	<p>The Applicant notes that Peterborough City Council clarifies in Section 8 of the LIR that:</p> <p><i>“Whilst the scheme will have impacts on biodiversity and habitats, subject to further clarification on the proposed mitigation and compensation the proposal would comply with policies LP22 and LP28 of the adopted Peterborough Local Plan.”</i></p>

Reference	Written Representation	Applicant's Response
	<p>Policy LP28 (Biodiversity and Geological Conservation) advises:</p> <p>Part 1: Designated Site International Sites- The highest level of protection will be afforded to these sites. Proposals which would have an adverse impact on the integrity of such areas and which cannot be avoided or adequately mitigated will only be permitted in exceptional circumstances where there are no suitable alternatives, over riding public interest and subject to appropriate compensation.</p> <p>National Sites- Proposals within or outside a SSSI likely to have an adverse effect will not normally be permitted unless the benefits outweigh the adverse impacts.</p> <p>Local Sites- Development likely to have an adverse effect will only be permitted where the need and benefits outweigh the loss.</p> <p>Habitats and Species of Principal Importance- Development proposals will be considered in the context of the duty to promote and protect species and habitats. Development which would have an adverse impact will only be permitted where the need and benefit clearly outweigh the impact. Appropriate mitigation or compensation will be required.</p> <p>Part 2: Habitats and Geodiversity in Development All proposals should conserve and enhance avoiding a negative impact on biodiversity and geodiversity.</p> <p>Part 3: Mitigation of Potential Adverse Impacts of Development Development should avoid adverse impact as the first principle. Where such impacts are unavoidable they must be adequately and appropriately mitigated. Compensation will be required as</p>	

Reference	Written Representation	Applicant's Response
	a last resort.	
	Chapter 6 [APP-046] of the Environmental Statement goes into detail of the current ecological baseline of the area potentially impacted by the proposed development. These surveys are extensive and complete in their scope with the exception of the Great Crested Newt surveys. The mitigation and compensation for Great Crested Newts is well understood and subsequent requirements can be included within the Ecological Mitigation Plan.	This is noted.
	<p>The proposed mitigation and compensation is sufficient for the proposed work for the Council's material concerns to be discounted. Points of clarification on mitigation and compensation are requested.</p> <p>Tables 8-11, 8-12, 8-13 and 8-14 within the ES detail the compensation and mitigation required over the construction and operational phase of the development.</p> <p>It is noted that as compensation unimproved calcareous grassland will be created in order to compensate for the loss of grassland from the Sutton Meadows CWS. The creation of this grassland will be detailed within the EMP. This is encouraged however the seed mix to be used in replanting must be considered carefully. The seed mix should either be collected from cuttings on site or created from the botanical species lists created.</p>	The Applicant acknowledges this comment.
	The methodology for the translocation of hedges should be considered as compensation rather than mitigation. Hedges which have been identified to be translocated should be risk assessed for the potential of failure after translocation. Any potential for failure of translocation should have a backup	Please refer to Applicant's response to RR-036-31 in the Applicant's Response to Relevant Representations (REP1-010).

Reference	Written Representation	Applicant's Response
	<p>plan for replacement of the habitat appropriate to the potential loss of hedge. The loss of hedgerows and the failure of translocated hedges is the largest concern.</p>	
	<p>It is noted that rather than creating a wildlife tunnel the old disused railway will be used. While this is acceptable for the current scheme, it is known that there is interest to use the dismantled railway as a cycleway from Sutton to Barnack. Has the potential for the installation of a secondary Wildlife Tunnel been ruled out of the proposed design already?</p>	<p>Please refer to Applicant's response to RR-036-32 in the Applicant's Response to Relevant Representations (REP1-010).</p>
	<p>The potential Invasive Non-Native Species found on site should be included within any tool box talked performed on site.</p>	<p>Please refer to Applicant's response to RR-036-33 in the Applicant's Response to Relevant Representations (REP1-010).</p>
	<p>Whilst the scheme will have impacts on biodiversity and habitats, subject to further clarification on the proposed mitigation and compensation the proposal would comply with policies LP22 and LP28 of the adopted Peterborough Local Plan.</p>	<p>This comment is noted.</p>
<p>9</p>	<p>9. Air Quality As construction activities are programmed to last less than two years, it is unlikely there would be a significant effect on air quality or affect the UK's ability to comply with the Air Quality Directive. The Construction traffic assessment was therefore screened out of the assessment.</p> <p>With the recommendation of best practice construction mitigation measures in place, the impact of construction dust is considered highly unlikely to trigger a significant air quality effect. Therefore, in accordance with LA 105, no significant effects on sensitive receptors have been identified.</p>	<p>This comment is noted.</p>

Reference	Written Representation	Applicant's Response
	<p>The air quality assessment has concluded there would be no significant effects on air quality at human and ecological receptors as a result of the Proposed Scheme.</p>	
10	<p>10. Noise and Vibration Noise and Vibration is reported in Chapter 11 of the ES [APP-049]. There is no objection to the proposed scheme in terms of noise subject to monitoring described in section 11.1 of the 9 Environmental Statement and effective implementation of mitigation measures to minimise adverse impacts in section 11.9 of the Environmental Statement.</p> <p>Best practicable means for noise and vibration mitigation should be employed in conjunction with British Standard (BS) 5228- 1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise and BS 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 2: Vibration.</p>	<p>This comment is noted</p> <p>Please refer to Applicant's response to RR-036-40 in the Applicant's Response to Relevant Representations (REP1-010).</p>
	<p>Best Practicable Means should also be used for all overnight lighting requirements and for the control of dust during construction. It is recommended that a Section 61 prior consent application under the Control of Pollution Act 1974 be made for the entirety of the works once a schedule of works has been finalised. This will be particularly important for night-time works once the scope and duration of such works have been defined.</p>	<p>Please refer to Applicant's response to RR-036-40 in the Applicant's Response to Relevant Representations (REP1-010).</p>
	<p>Construction Noise: - The majority of the construction work will take place during the daytime and on Saturday afternoons; typical construction times will be between 07:00-19:00 on weekdays and Saturdays. 11.5.4. Night-time or weekend works will be required at some stages, such as, road tie-ins and traffic management. Night</p>	<p>Please refer to Applicant's response to RR-036-44 in the Applicant's Response to Relevant Representations (REP1-010).</p>

Reference	Written Representation	Applicant's Response
	<p>works will take place from 20:00- 06:00. There may be exceptions to these hours for oversized deliveries, and junction tie-ins.</p> <ul style="list-style-type: none"> - Subject to the provision of temporary noise barriers, implementation of best practicable means, construction noise monitoring where required, use of trunk roads only for diversion routes, and the mitigation measures described within Section 11.9, construction noise is not predicted to result in any significant adverse residual effects. - A construction noise assessment has been undertaken, identifying that adverse impacts that are likely to constitute significant effects would occur without mitigation at some of the receptors closest to construction works. Suitable means of minimising the potential for significant adverse have been presented including the provision of acoustic barriers. - Where all mitigation is implemented effectively, significant residual construction noise effects are not expected. - Temporary noise barriers are predicted to mitigate the potential for significant noise effects at all receptors, with the exception of 6, 8, 10 and 12 Great North Road, where a moderate adverse impact is predicted during the preworks, phase 1, and stage 5 works when works occur outside daytime hours. - Construction works in the vicinity of these receptors should therefore not occur during the proposed weekend hours of 1300 – 1900 where possible. Where this is not possible, the Principal Contractor shall implement mitigation including further detailed assessments and the application of best practicable means of noise control. 	

Reference	Written Representation	Applicant's Response
	<p>Construction Traffic: - A construction traffic assessment has been undertaken. It is concluded that, provided that the anticipated vehicle movements and routes are restricted as defined in the Outline Traffic Management Plan (TR010039/APP /7.6) potential significant effects are unlikely.</p>	<p>This is noted.</p>
	<p>Diversion routes: - Consideration has been given to the traffic diversion routes during road closures required to undertake the construction works. It is concluded that, provided diversion routes utilise trunk roads where possible, the noise increase due to diverted traffic is not likely to constitute a significant effect. Should it be determined that local roads need to be used as diversion routes, mitigation measures, including use of varying routes, and advance notice to residents, are proposed.</p>	<p>Please refer to Applicant's response to RR-036-46 in the Applicant's Response to Relevant Representations (REP1-010).</p>
	<p>Operational Noise: - The assessment of operational noise includes embedded mitigation in the form of a low noise surface along high-speed sections of the Proposed Scheme. The assessment of operational noise demonstrates that there are no significant adverse or significant beneficial noise effects expected due to changes in road traffic noise. This applies at all receptors within the study area and the NIAs identified.</p>	<p>These comments are noted.</p>
	<p>Vibration: - An assessment of potential construction vibration impacts has identified that significant effects would occur without mitigation at the closest receptors to vibration-generating activities. Therefore, prior warning of residents, pre-condition building surveys, restrictions on the timings of the works, and vibration</p>	<p>These comments are noted.</p>

Reference	Written Representation	Applicant's Response
	<p>monitoring are proposed as mitigation at the closest properties to these works. The Proposed Scheme is not predicted to give rise to significant vibration effects subject to monitoring and effective implementation of the identified mitigation.</p> <p>- Vibration from the static works such as structure formation could occur for longer durations and shall be considered in further detailed construction vibration assessments by the Principal Contractor on the basis of finalised work durations.</p>	
	<p>Communication: The potential effects of construction noise and vibration on local community receptors can be lessened by effective communication. Good public relations are invaluable in securing public acceptance of construction noise. People are typically more tolerant of construction noise and vibration if they understand the reason for it, the likely duration, start and finish dates, and that measures are being employed to reduce noise and vibration as far as practicable. Letter drops explaining this would aid communication with the local community. A dedicated site contact for the public and a complaints handling procedure shall also be put in place.</p>	<p>Please refer to Applicant's response to RR-036-49 in the Applicant's Response to Relevant Representations (REP1-010).</p>
11	<p>11. Landscape and Visual Effects LP24 (Nene Valley) advises that within the Nene Valley area the council will support development that will safeguard and enhance recreation and/or bring landscape, nature conservation, heritage, cultural or amenity benefits. The proposal would need to be appropriate in terms of use, scale and character.</p> <p>Development which would increase flood risk or compromise the performance of flood defences will not be permitted.</p>	<p>The Applicant can confirm that no part of this Scheme will increase flood risk or compromise the performance of flood defences, as shown in ES Appendix 13.1 Flood Risk Assessment (TR010039/APP/6.3 Rev 1) through the exception test and approved by the Environment Agency (EA) and Lead Local Flood Authority (LLFA).</p>

Reference	Written Representation	Applicant's Response
	<p>Policy LP27 (Landscape Character) advises that new development in and adjoining the countryside should be located and designed in a way that is sensitive to its landscaping setting, retaining and enhancing the landscape character. Policy LP29 (Trees and Woodland) advises that proposals should be prepared based upon the overriding principle that existing tree and woodland cover is maintained. Opportunities for expanding woodland should be actively considered.</p>	<p>ES Chapter 7 Landscape and visual effects (APP-045) section 7.8 details that new woodland, trees and hedgerows would be planted. This is also found on the Environmental Masterplan (REP2-024) that sets out the additional proposed landscape and visual mitigation of the Scheme.</p>
	<p>Proposals which would result in the loss or deterioration of ancient woodland and or the loss of veteran trees will be refused unless there are exceptional benefits which outweigh the loss. Where a proposal would result in the loss or deterioration of a tree covered by a Tree Preservation Order permission will be refused unless there is no net loss of amenity value or the need for and benefits of the development outweigh the loss. Where appropriate mitigation planting will be required.</p>	<p>Please refer to Applicant's response to RR-045-1 in the Applicant's Response to Relevant Representations (REP1-010).</p>
	<p>The applicant has also submitted a Landscape Visual Impact Assessment [APP-045] which concludes that by year 15 of operation, with the establishment of Proposed Scheme landscape mitigation, effects on landscape character would be slight adverse (not significant) on both the Nene Valley and Nassaburgh Limestone Plateau.</p> <p>By year 15 of operation the establishment of Proposed Scheme planting would contribute to screening and landscape integration and there would be no residual significant visual effects.</p> <p>The assessment concludes that overall, combining both landscape and visual effects, the Proposed Scheme would not, overall, result in a significant long term residual effect on overall</p>	<p>No response required.</p>

Reference	Written Representation	Applicant's Response
	<p>landscape and visual amenity. It is acknowledged that a small number of visual receptors would experience a residual adverse (albeit not significant) visual effect, however in the context of the overall Proposed Scheme this would be a relatively limited change.</p>	
	<p>The detail within the Arboricultural Impact Assessment (AIA) is not clear throughout with regards to the trees to be removed/retained. Confirmation is required with regards to the retention of trees T.97 & T.98, T.104, T.113 & T.115/T.116 & T.117 in particular.</p> <p>Tree T.18 should be retained.</p>	<p>In regard to T18 please refer to Applicant's response to RR-036-36 in the Applicant's Response to Relevant Representations (REP1-010).</p> <p>In regard to (T.97 & T.98, T.104, T.113 & T.115/T.116 & T.117.) please refer to RR-036-36 and EXQ 1.8.6.</p> <p>The Applicant can confirm that all of these trees are retained. This is detailed in Section 3 (Table 2) of ES Appendix 7.6: Arboricultural Impact Assessment (REP2-022).</p>
	<p>Tree replacement numbers within the planting proposals to include additional mitigation planting numbers for direct loss of Category A & B trees to comply with the Council's Local Plan Policy LP29.</p>	<p>Please refer to Applicant's response to RR-036-36 in the Applicant's Response to Relevant Representations (REP1-010).</p>
	<p>PCC has no objection in principle however wishes to reserve its position at this stage pending further progress of the examination and discussions with the Applicant.</p> <p>PCC considers that with appropriate mitigation, following the principles set out in the environmental masterplan the landscape impacts can be adequately mitigated.</p>	<p>This is noted.</p>
12	12. Drainage	The Applicant notes the clarification in Section 12 of

Reference	Written Representation	Applicant's Response
	<p>Policy LP32 (Flood and Water Management) advises that proposals should adopt a sequential approach to flood risk management in line with the NPPF and council's Flood and Water Management SPD. Sustainable drainage systems should be used where appropriate. Development proposals should also protect the water environment.</p> <p>Chapter 13 - Road Drainage and Water Environment of the ES [APP-051] reports the potential significant effects for the road drainage and the water environment as a result of the Proposed Scheme. This assessment includes a review of the existing baseline conditions, consideration of the potential impacts and identification of proportionate mitigation and enhancement.</p>	<p>the LIR that:</p> <p><i>'PCC raise no issues in respect of policy LP32 subject to the lead local flood authority being satisfied through the examination process. PCC welcome further discussion with the applicant and consultation with regards to further iterations of the drainage scheme/EMP'.</i></p>
	<p>PCC has no concerns in principle with the proposed surface water drainage strategy for the proposed scheme. However, further information is required including:</p> <ul style="list-style-type: none"> • The condition survey of Mill Stream and Wittering Brook, including details of any existing assets or structures. • The temporary drainage strategy for the proposed scheme for all phases of construction, which should include but is not limited to; <ul style="list-style-type: none"> - Clarification of how all surface water will be collected and managed on site during the construction. - Details of how silts will be managed and controlled prior to any outfall. - A phasing plan, including a timeline for its implementation. - Details of any pollution and water quality controls. - Details of all temporary drainage assets, which includes 	<p>Please refer to Applicant's response to RR-036-50 in the Applicant's Response to Relevant Representations (REP1-010).</p> <p>The Applicant welcomes the advice on the content of the temporary drainage strategy; this will be developed at detailed design stage as part of the EMP Annex B.7 Water Monitoring and EMP (REP2-027)]. This Commitment will be delivered under DCO Requirement 4.</p> <p>The Applicant welcomes the advice on the content of the Drainage strategy report (APP-129). A revised Drainage strategy report (APP-129) will be submitted for review to the Lead Local Flood Authority and the Environment Agency following detailed drainage design. Commitments RD8 and RD12 of Table 3.1 REAC of the EMP (REP2-027) record this</p>

Reference	Written Representation	Applicant's Response
	<p>but is not limited to, construction details, clarification regarding proposed permanent and temporary structures and their trigger for removal.</p> <ul style="list-style-type: none"> - A demonstration of the overland flood flow / exceedance routes for each phase of the construction. - Construction maintenance, management and any remediation schedules required as parts of the works. <ul style="list-style-type: none"> • The details of any further ground investigation. • A full and up to date surface water drainage strategy for the operational scheme, which includes but is not limited to the following: <ul style="list-style-type: none"> - Information about the design storm period and intensity, discharge rates and volumes (both pre and post development), means of access for maintenance, the methods employed to delay and control the surface water discharged from the site and the measures taken to prevent flooding and pollution of the receiving groundwater and/or surface waters; - Any works required off-site to ensure adequate discharge of surface water without causing flooding or pollution (which should include refurbishment of existing culverts and headwalls or removal of unused culverts where relevant); - A timeline for its implementation; - Full and up to date drainage strategy drawings; - Construction/ technical details of all drainage assets; - Cross sections for all attenuation and infiltration basins; - Details of the erosion protection measures for all proposed outfalls and the proposed interception drainage; - Confirmation of the surface water drainage proposals at Upton Drift Road; - Final overland flood flow routes/exceedance routes; 	<p>commitment which will be delivered under DCO Requirement 4.</p>

Reference	Written Representation	Applicant's Response
	<ul style="list-style-type: none"> - A management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by an appropriate public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. 	
	<p>PCC raise no issues in respect of policy LP32 subject to the lead local flood authority being satisfied through the examination process. PCC welcome further discussion with the applicant and consultation with regards to further iterations of the drainage scheme/EMP.</p>	<p>This is noted and the Applicant is committed to further consultation during the next stages of the project. See Requirement 8 of the draft DCO (dDCO) (TR010039/APP/3.1 Rev 2).</p>
13	<p>13. Consideration of the draft order With regards to the Draft Development Consent Order, PCC in general terms does not wish to raise any concerns, however the Council wishes to reserve its position at this stage pending further progress of the examination and discussions with the Applicant.</p>	<p>This is noted.</p>
14	<p>14. Conclusions Peterborough City Council remains supportive of the A47 Wansford to Sutton dualling scheme. The scheme will support economic growth, improve journey times, improve safety, provide capacity for future growth and provide a safer route between the communities for walking, cycling horse-riding and other road users.</p>	<p>This is noted.</p>