

A47 Wansford to Sutton Dualling

Scheme Number: TR010039

Volume 9

9.27 Applicant's Comments on Responses to the Examining Authority's Further Written Questions (ExQ2)

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

Planning Act 2008

May 2022

Deadline 6

Infrastructure Planning

Planning Act 2008

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

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

**9.27 APPLICANT'S COMMENTS ON RESPONSES TO
THE EXAMINING AUTHORITY'S FURTHER WRITTEN
QUESTIONS (ExQ2)**

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1 INTRODUCTION

- 1.1.1 The Development Consent Order (DCO) application for the A47 Wansford to Sutton Scheme was submitted on 05 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 responses to the Examining Authority's Further Written Questions (ExQ2).

2 PETERBOROUGH CITY COUNCIL (REP5-026)

ExQ2	Question:	Response	Applicant's Comment
2.2.1	Standing advice On 14 January 2022 Natural England and the Forestry Commission updated their standing advice in respect of protected species and ancient woodland, ancient trees, and veteran trees. Could the Applicant, NE and PCC please make any comments they feel appropriate in light of these revisions.	<p>All new standing advice should be complied with. This may involve updating ongoing survey requirements ,mitigation and compensation methodology and ongoing management requirements.</p> <p>PCC will always use the most up to date official guidance when assessing applicant compliance with guidance.</p>	Please refer to the Applicant's response to ExQ 2.2.1 within the Applicant's Response to the Examining Authority's Further Written Questions (REP5-022), which concludes that there is nothing in the updated advice that changes the Applicant's approach or assessment.
2.4.1	Heritage assets In its responses to ExQ1.4.3 [REP2-067] PCC has noted a number of discrepancies as to the identification of heritage assets. Could the Applicant please discuss this with PCC and make any necessary changes to the documentation.	This is still under discussion with the applicant. The applicant responded to this in the document [REP3- 027] and advised that a full cross-reference can be provided if requested.	At the current time a full cross reference has not been requested by Peterborough City Council (PCC).
2.4.2	Milestone adjacent to A47 (WAN05) In the REAC Reference CH4 it is indicated that a milestone has been identified on the north verge of the A47 slightly to the east of the petrol filling station. The Applicant indicates that its proposal is to remove/ reinstall this. It then states: "The asset will then be proposed to be listed to Grade II for or local listing as appropriate". While appreciating that formal listing needs to go through the normal procedures, could the Applicant, HBMCE and PCC: a) Indicate what status that they consider the asset should be given in the Examination? b) Set out their views as to the effect of the Proposed Development on the significance of the asset?	<p>a) The asset should be considered to meet the criteria to be placed on Peterborough's Local List and consequently a non-designated heritage asset for the purposes of the examination.</p> <p>b) The impact of the proposals is dependent on two factors, where the asset will be relocated to and the proposed restoration works. The significance of the milestone is intrinsically linked with the road, which has been upgraded many times over the course of its history. The dualling however is more a substantive change than any previously for this section, with regard scale, realignment and splitting of carriageways.</p> <p>Although the motorisation of the road has for all</p>	<p>It is currently expected that the asset can be replaced in its current location. However, as stated, the details of the treatment of the asset, including placement and visibility to traffic, will be agreed as part of the mitigation strategy.</p> <p>Specific PCC roles have been specified in the amended Record of Environmental Actions and Commitments (REAC) of the updated Environmental Management Plan (EMP) (TR010039/APP/7.5 Rev 3),</p>

ExQ2	Question:	Response	Applicant's Comment
		<p>intents and purposes precluded foot traffic where the milestone would be made readily appreciated, its location is historic and on a crossable road where it can be appreciated by both direction of travel.</p> <p>The loss of the appreciation by westbound traffic will be detrimental impact to the significance of the asset, however as noted previously and by its omission from the first site walkover, it is not particularly appreciated currently. This limits the extent of the harm from the loss of appreciation from westbound traffic.</p> <p>The proposed restoration of the milestone is supported in principal and although no further information has been provided regarding the works, PCC is content for this to be dealt with via condition provided that PCC have a clear role in assessing the suitability of the works. This element of the proposal therefore has the potential to be of benefit to the significance of the asset.</p> <p>Provided that the milestone was returned to the northside of the eastbound carriageway in a translated location with suitable restoration, it would be considered that there would on balance be no detrimental impact to the significance of the asset.</p> <p>Conversely. If there proposed location was not acceptable and/or the restoration were not carried out, the impact would be considered at the lower end of less than substantial harm. If the milestone is removed from site the impact would be greater and PCC would require that a Level 3 Historic</p>	<p>submitted at Deadline 6.</p>

ExQ2	Question:	Response	Applicant's Comment
		Building Recording be conducted on the milestone and that it is handed over to them, to be relocated within the district.	
2.9.1	Definitions/ Specification Could PCC please provide definitions and further information as to the terms "TSM" and "CASC+" in respect of road surfacing?	'TSM' refers to Thin Surface Material with a proprietary mix of asphalt material. CASC+ refers to Cambridgeshire Surfacing Material – this is the preferred material for use on higher classification roads. Both have negative textures, so less noisy compared with Hot Rolled Asphalt.	No response required. Please refer also to the Applicant's response to this question (ExQ 2.9.1) within the Applicant's Response to the Examining Authority's Further Written Questions (ExQ2) (REP5-022).
2.12.3	Post-consent approvals In the Applicant's response to ExQ1.12.25 [REP2-035] it is stated that information sought by PCC relating to prior-consent matters, including a condition survey of Mill Stream and Whittering Brook, the temporary drainage strategy, details of any further ground investigation, and a full and up-to-date surface water drainage strategy for the operational phase will be secured by Requirement 4. Is PCC content with the arrangements as set out?	The response sets out that the requested information will be secured by Requirement 4 of the dDCO (AS010) and the progressive changes to the EMP during the course of the examination. Therefore, PCC is content with this arrangement.	No response required.

3 HISTORIC ENGLAND (REP5-030)

ExQ2	Question:	Response	Applicant's Comment
2.4.2	Milestone adjacent to A47 (WAN05) In the REAC Reference CH4 it is indicated that a milestone has been identified on the north verge of the A47 slightly to the east of the petrol filling station. The Applicant indicates that its proposal is to remove/reinstall this. It then states: "The asset will then be proposed to be listed to Grade II for or local listing as appropriate". While appreciating that formal listing needs to go through the normal procedures, could the Applicant, HBMCE and PCC: a) Indicate what status that they consider the asset should be given in the Examination? b) Set out their views as to the effect of the Proposed Development on the significance of the asset?	<p>a) as noted in the Examiners Question it is not clear if the asset would meet the criteria to be added to the national list as it has not been assessed or information regarding its assessment has not been put forward at this time. At present, and in our view the milestone would meet the criteria to be considered as a non-designated heritage asset (NDHA). We are however aware this would be a matter for the LPA to consider as within their remit.</p> <p>b) As an undesignated asset or NDHA it would be for the LPA provide details of impacts and policy consideration under NPPF Chapter 16. We would again have to defer comment with regards to the effect of the proposal upon the asset to the LPA.</p>	The Applicant acknowledges Historic England's comments. By way of response to both (a) and (b), please see the response provided by Peterborough City Council to ExQ 2.4.2 (REP5-026) and the Applicant's comment on that response above in this document.

4 NATURAL ENGLAND (REP5-031)

ExQ2	Question:	Response	Applicant's Comment
2.2.1	Standing advice On 14 January 2022 Natural England and the Forestry Commission updated their standing advice in respect of protected species and ancient woodland, ancient trees, and veteran trees. Could the Applicant, NE and PCC please make any comments they feel appropriate in light of these revisions.	Natural England has no further comments to make regarding the updated standing advice for protected species and ancient woodland, ancient trees, and veteran trees.	The Applicant acknowledges this comment. Please refer to the Applicant's response to ExQ 2.2.1 within the Applicant's Response to the Examining Authority's Further Written Questions (REP5-022), which concludes that there is nothing in the updated advice that changes the Applicant's approach or assessment.
2.2.2	Sutton Heath and Bog SSSI In its response to ExQ1.2.8 the Applicant indicates that "the habitat 40m into the SSSI is largely deciduous woodland containing species which are not sensitive to nitrogen deposition". a) Is NE satisfied with this statement and able to confirm this? b) If not, could NE provide evidence to show that the Applicant's approach is not appropriate.	a) The information available to Natural England concurs that the habitat referenced is largely deciduous woodland. The degree to which this habitat is sensitive to nitrogen deposition is not considered relevant to our remit as deciduous woodland is not a designated feature of the SSSI. Further information relating to the designation of Sutton Heath and Bog SSSI is provided below. Whilst this does not definitively clear up the reason for designation of this area of woodland, the applicant may consider this useful in supporting their position that it was included because of its hydrological importance. Natural England confirmed at examination that this seemed a logical conclusion.	The Applicant acknowledges this comment.

ExQ2	Question:	Response	Applicant's Comment
		Whilst a hydrological connection between the affected area and the designated feature provides an additional pathway for pollutants Natural England is of the view that this is unlikely to be sufficient to cause an adverse effect on the SSSI.	