

# A47 Wansford to Sutton Dualling

**Scheme Number: TR010039**

## **Volume 9** **9.28 Applicant's Comments on Deadline 6** **Submissions**

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

Planning Act 2008

May 2022  
Deadline 7

Infrastructure Planning

Planning Act 2008

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

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

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**9.28 APPLICANT'S COMMENTS ON DEADLINE 6  
SUBMISSIONS**

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<b>Rule Number</b>	Rule 8(1)(c)
<b>Planning Inspectorate Scheme Reference</b>	TR010039
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<b>Author</b>	A47 Wansford to Sutton Project Team, National Highways

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## **CONTENTS**

<b>1</b>	<b>INTRODUCTION.....</b>	<b>4</b>
<b>2</b>	<b>WANSFORD PARISH COUNCIL (REP6-008 AND REP6-009) .....</b>	<b>5</b>
<b>3</b>	<b>DAVID LONGFOOT (REP6-010 AND REP-011).....</b>	<b>12</b>
<b>4</b>	<b>LATE SUBMISSION - SUTTON PARISH COUNCIL (REP6-012 AND REP-013) .</b>	<b>14</b>

## **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 Deadline 6 submissions.

## 2 WANSFORD PARISH COUNCIL (REP6-008 AND REP6-009)

Response		Applicant's Response																																																																																																																																																																																																																																																																				
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1	<p>In response to the Examining Authority's request for actions by the Applicant National Highways has submitted a 30 page Technical Note covering calibration of the modelling and attempting some sensitivity analysis in terms of the traffic flows.</p> <p>The methodology for this work is fairly complex and no doubt it follows the guidance for such calibration and testing. While it is very fine to follow the guidance, there are times when common sense and engineering judgement need to be used. The original figures used in the traffic analysis of the western roundabout are shown below (since then the modelling years and other factors have changed slightly but the basic pattern remains).</p>	Please see the Applicant's response to REP6-008 Point 2 below.																																																																																																																																																																																																																																																																				
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Commentary and discussion included in this response is therefore related to the TA data rather than any superseded information.</p> <p>As discussed in the Applicant's response to Wansford Parish Council's Deadline 2 written representation (REP2-072) Point 2 pages 2-4 within Applicant's Response to Written Representations (<b>REP3-026</b>), the previous modelling is superseded due to a number</p>
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	<p>From the table it can be seen that between the base year and the end of the modelling period all the flows on the A47 and the A1 have increased by between 40 and 80%. The flow on Old North Road is shown as reducing by nearly 40% over the same period.</p> <p>This completely atypical change results from the use of a very crude algorithm that states that driver behaviour is completely driven by distance and speed limits. Anyone looking at this with an analytical mind would say "what happens if this algorithm is wrong?". The response, using normal engineering judgement, would be to do a simple check run of the model using traffic numbers for Old North Road that increase in line with other flows.</p> <p>In their sensitivity analysis, NH have used slightly higher flows for Old North Road than in the base case but they are still significantly lower than the flows in the base year.</p> <p>This issue has been pointed out repeatedly to NH but they persist in using complex calculations to try and prove their case. They seem to believe that the traffic prediction system that shows this large reduction in flows on Old North Road is infallible. History has shown that no modelling of the future is infallible.</p>	<p>of factors including revisions to the Scheme, different forecast years and updated TAG guidance and Road Traffic Forecast (RTF).</p> <p>Section 6 of the TA provides information on the A47 Wansford modelling assessment. The modelling assessment comprises of a strategic model which covers Wansford, the A1/A47 junction and the surrounding area. The strategic modelling assessment is used as the basis to derive forecasted traffic impacts of the Scheme's performance across the wider area. The model utilised for the assessment of the Scheme is called the Wansford Traffic Model (WTM). The model, utilised for PCF stage 3, has been developed in line with the DfT Transport Appraisal Guidance (TAG).</p> <p>Section 7.3 of the TA includes the annual average daily traffic (AADT) results for each forecast scenario on Old North Road. The results show the level of traffic on Old North Road decreasing from the 2015 Base Year (BY) (4,500 AADT) in both the DM 2025 (2600 AADT) and 2040 (3100 AADT) scenarios.</p> <p>The Applicant wishes to refer the Examining Authority back to the Applicant's response to Wansford Parish Council's Deadline 2 written representation (REP2-072) Point 2 pages 2-4 within Applicant's Response to Written Representations (<b>REP3-026</b>), which outlines:</p> <ul style="list-style-type: none"> <li>• The comparison of AADT flows between the superseded assessment and the TA</li> <li>• The decreasing trend in observed data from 2014 to 2021 along Old North Road</li> <li>• Model analysis showing increasing delays on Old North Road in the 2040 forecast year</li> <li>• The combination of the identified factors reduces the</li> </ul>

Response	Applicant's Response
	<p>attractiveness of Old North Road for daily through traffic movements.</p> <p><u>Sensitivity Test Analysis</u></p> <p>The WTM has been developed in line with the DfT Transport Appraisal Guidance.</p> <p>With respect to the general modelling process, it should be noted that, the WTM model is a WebTAG calibrated Wardrop user equilibrium assignment model using SATURN software, where all trips across the network will select the optimum route based on the generalised cost of travel between different ODs.</p> <p>Wardrop user equilibrium is based on the following proposition:</p> <p>‘Traffic arranges itself on congested networks such that the cost of travel on all routes used between each origin-destination pair is equal to the minimum cost of travel and unused routes have equal or greater costs.’</p> <p>Thus, it is not possible to select target growth on individual links and routes as this will disrupt the overall equilibrium of the assigned model.</p> <p>However, the WTM strategic SATURN model has been adopted to undertake a high-level sensitivity test analysis of the closure of Peterborough Road in the eastbound direction at the A1 junction. This sensitivity test was undertaken to address concerns from Wansford Parish Council (WPC) with respect to the forecasted traffic growth in Wansford village in the core scenario results</p>

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		<p>detailed in Section 7 of the TA a sensitivity test was undertaken.</p> <p>The sensitivity test results show that traffic flows will increase on Old North Road (Site 1) and London Road (Site 6). In the AM peak DM scenario there is an increase on Old North Road of around 50-150 PCUs and on London Road of around 100-200 PCUs. In the DM PM peak, there is an increase on Old North Road of up to around 60 PCUs. The increase in traffic on Old North Road is primarily due to an increase in northbound traffic accessing the Wansford Western roundabout. However, it should be noted that in the sensitivity test the future year traffic levels on Old North Road remain below the base year scenario in both the AM and PM peak hours as well as at AADT level.</p> <p>Outside of Wansford village, the Peterborough Road closure sensitivity test results show a negligible impact in the wider area. In the wider area, AADT traffic flows stay broadly consistent between the core scenario and the sensitivity test.</p> <p>In summary, the Peterborough Road sensitivity test results show that in the local area around Wansford village traffic flows will primarily reassign to Old North Road and London Road. This traffic reassignment impact is larger in the AM peak, as the peak traffic movement in the AM period is in the eastbound direction. However, the wider area model results show that this traffic re-assignment away from Peterborough Road in the sensitivity test will have a negligible impact on the AADTs and the overall operation of the scheme in the DS scenario.</p>
<b>REP6-009 - Comments on Document 9.25 Applicant's Response to the ExA's Further Written Questions Annex E: A47/A1 Western Roundabout Traffic Signal Option Assessment Technical Note</b>		



	Response	Applicant's Response
1	<p>In response to the Examining Authority's request to see the analysis that the Applicant had done on the option to replace the western roundabout with a signalled junction, Annex E has been submitted.</p> <p>Annex E contains the same technical note that Wansford Parish Council reviewed and commented on several months ago. As stated at the time, the analysis used is very basic and it is likely that considerable improvements in the performance of the junction could be achieved if the scheme was optimised. Areas of optimisation include:</p> <ol style="list-style-type: none"> <li>1. The lengthening of all dedicated right turn lanes to improve the number of vehicles accommodated and to prevent interference with vehicles wanting to turn left or carry straight on. The main example of this is for vehicles heading west on the A47 and wanting to turn right onto the A1 northbound. National Highways has shown this as 90m while in reality it is 225m.</li> <li>2. Using an "intelligent" traffic light system which adapts the timing of the signals to the individual traffic flows. The need for this is clear because of the considerable differences in the balance of the various flows through the day. The modelling was based on a crude fixed period control system. National Highways (NH) have discarded the use of a signalled junction because they say that it does not solve the problems of the western roundabout. It does however show a small improvement on the proposed do something case and with further optimisation this gain can be increased.</li> </ol> <p>Instead of studying the issues of the western roundabout and looking for improvements, National Highways seem to prefer to just do nothing.</p>	<p>Annex E of the Applicant's Response to the Examining Authority's Further Written Questions (ExQ2) - Annexes (<b>REP5-023</b>) contains the results of the LINSIG junction assessment of the suggested traffic signal option for the A47/A1 western roundabout, which is contained broadly within the current highway boundary.</p> <p>As discussed in the Applicant's response to Wansford Parish Council's Deadline 2 written representation (REP2-072) Point 3 page 5 onwards within Applicant's Response to Written Representations (<b>REP3-026</b>), analysis of the LINSIG results indicates that in the DS scenario the junction is either near to or exceeding the capacity constraints along the A47 eastbound approach during the AM and PM peaks in both 2025 and 2040. In the PM peak the junction is over capacity on the A47 westbound approach. Old North Road is close to its capacity limitation in the 2040 AM peak experiencing a delay of around 2 minutes. In the 2040 AM the A1 off-slip southbound movement is over capacity (111%).</p> <p>Overall, in the AM peak scenario, the signalised junction provides less capacity and increases the total delay at the junction.</p> <p>Although the PM peak results indicate an overall decrease in total delay, it should be noted that the results still show that several of the approach roads are operating close to the reasonable capacity limitations. Therefore, the LINSIG assessment indicates that the signalised junction does not resolve the existing junction congestion issues.</p> <p>This assessment was undertaken utilising the industry standard LINSIG software package to evaluate signal operation in peak hour</p>

	Response	Applicant's Response
		congested traffic conditions. LINSIG calculates optimal signal settings based on fixed timings. In congested conditions, where all arms are experiencing queuing, these timings will minimise delay across the junction. Although other signal optimisation methods (such as MOVA) could improve the operation of the junction slightly, it will not resolve the peak hour congestion issues of the suggested signalised junction
2	<p>The applicants written summary of oral submissions at hearings raise a number of issues as set out below:</p> <p>Ref 3.1 Scheduled Monument</p> <p>There has been repeated reference to the significance of blank spaced in the 2017 geophysical survey. The survey technique used shows up areas where there has been excavation and infilling or burning and it also shows any metallic items that may be present. The ground in the area of the Scheduled monument is free draining, alkaline and well aerated. This means that no cloth, leather or soft tissue remains will have survived (unlike at say Flag Fen where items have been preserved in acidic saturated mud). The only thing likely to be missed by the survey is pottery and this will have been destroyed by the ploughing (note the pottery fragments scattered over other parts of the site).</p> <p>The Applicant drew a parallel between the spaces in the Scheduled Monument that showed no evidence of features with the space between Buckingham Palace and the Victoria Monument. The area of the Scheduled Monument is a field that has been extensively ploughed. We have no knowledge of any past ceremonial use and even if there was, it has left no trace of its existence. The space between Buckingham</p>	<p>The wording in this response from Wansford Parish Council is identical to their written representation REP5-028 at Deadline 5. This representation was responded to at Deadline 6 within the Applicant's Comments on Deadline 5 Submissions (<b>REP6-006</b>) on page 10, which stated: "<i>The Applicant considers that it has addressed comments relating to the Scheduled Monument in previous submissions, including, but not limited to the Applicant's responses to ISH2, Points 3.1 – 3.3 of the Applicant's Written Summary of Oral Submissions at Hearings (REP4-018), and the Applicant's Response to Wansford Parish Council Point 3.1 within the Applicant's Response to Written Representations (REP3-026). Submissions have also been made into the Examination by Historic England on these matters. Please refer to REP2-074 from Historic England, which discusses the harm to the designated asset.</i>"</p> <p>The Applicant has addressed these points and has no further response to make.</p>

	Response	Applicant's Response
	<p>Palace and the Victoria Monument is frequently used for large ceremonial functions as well as being a busy traffic route. The comparison is completely spurious and is irrelevant to the discussion.</p> <p>The Applicant knows perfectly well that there was review of the status and boundaries of the Scheduled Monument. The Applicant has copies of the documents that were submitted to this review. These very clearly show that there was a move to change the shape of the Scheduled Monument. The outline of the proposed area was submitted to the Examining Authority by Wansford Parish Council at Deadline 4.</p>	
3	<p>Ref 3.2 Scheduled Monument - possible alternative alignment</p> <p>In this response the Applicant states that the test for any alignment is whether it does less than substantial harm to the Scheduled Monument. What they have never explained is why they did not apply this test to the alternative alignment when it was suggested in 2018. Instead Highways England stated at the time that it was their policy not to encroach on Scheduled Monuments regardless of the consequences. Paragraph 2 of the ISH2 response indicates the use of a different test which is also not the one set out in the legislation.</p>	<p>The wording in this response from Wansford Parish Council is identical to their written representation REP5-028 at Deadline 5. This representation was responded to at Deadline 6 within the Applicant's Comments on Deadline 5 Submissions (<b>REP6-006</b>) on page 11, which stated: "<i>Please refer to the explanation at REP5-028, Point 3.1 above [within REP6-006] relating to the application of the precautionary principle. See also the response at REP5-027, Point 3.2.</i>"</p> <p>The Applicant has addressed these points and has no further response to make.</p>

### 3 DAVID LONGFOOT (REP6-010 AND REP-011)

	Response	Applicant's Response
<b>REP6-010 - Farmers Weekly Article with annotations</b>		
1	<p>Mr Longfoot Submitted the Farmers Weekly Article – Farmers blast ‘totally unsafe’ Highways England road plans 25 May 2021.</p> <p>Annotations added include (in red):</p> <p>A spokesperson said: “During the consultation, we received significant feedback regarding the scheme’s proposed southern route [south of the existing A47 road], its environment impacts and rat-running through local villages. <b>Never consulted with Upton Village (Rat-running never been a problem).</b></p> <p>“These changes also resulted in the removal of one of the access routes into the village of Upton and, to address this, the remaining route will be upgraded to allow for easy passing points for HGVs and agricultural vehicles. Upton has also suffered from rat-running, which will be resolved with these changes.”</p> <p><b>Rat running – this has never been a problem. Would be resolved anyway with new dual carriage way.</b></p>	<p>With regards to the comment about consultation with Upton Village, the Applicant has addressed this concern in previous responses, including the Applicant's Response to Relevant Representations (<b>REP1-010</b>) - <b>Common Response E</b>.</p> <p>The Scheme proposals remove the opportunity for a rat run between Langley Bush Road and the A47 via Upton.</p>
<b>REP6-011 - Works quote with annotations</b>		
1	<p>Highways England say this quote will not cover the specification they desire, but will not tell me what specification this is. So Mick George Construction cannot requote.</p> <p>How much will Galiford Try be charging for the ridiculous scheme they are proposing for Upton Drift?</p> <p>What a waste of public money!!!</p>	<p>The Applicant has previously discussed this quotation with the project stakeholder and has advised that the quotation received for a new access road does not take into account protection measures for the Anglian Water large diameter mains and other aspects including land purchase. The figure quoted is therefore not realistic for the works that would be required.</p>

2

Access Road - Wansford

MICK GEORGE

f	Description	Quantity	Unit	Rate	Extension
	Access Road - 800m x 4.5m				
	Strip topsoil (assuming 200mm thick)	720	m3	£ 1.00	£ 720.00
	Reduce level dig - 810mm thick	2,916	m3	£ 1.00	£ 2,916.00
	Compaction	3,600	m2	£ 0.40	£ 1,440.00
	Supply and Lay Terram	3,600	m2	£ 0.90	£ 3,240.00
	Supply and lay 590mm Cambs Spec Aggregate to achieve greater than 2% CBR including compaction	2,124	m3	£ 36.75	£ 78,061.25
	Extra Over for Granular Carboniferous Type 1	2,124	m3	£ 16.55	Rate Only
	Disposal on site of arisings assuming haul distance no greater than 200m	3,636	m3	£ 5.00	£ 18,180.00
	Extra Over for disposal off site assuming inert classification	3,636	m3	£ 17.00	Rate Only
	Provide and lay by machine and consolidate 150mm AC 20 dense binder 40/60 in two layers to BS 594967:2015	3,600	m2	£ 24.73	£ 88,981.20
	Provide and lay by machine and consolidate 60mm AC 20 dense binder 40/60 in two layers to BS 594967:2016	3,600	m2	£ 13.17	£ 47,401.20
	Sweep clean, and apply hot bituminous bond coat. Provide, lay by machine and consolidate 40mm of CASC PLUS surface course	3,600	m2	£ 14.40	£ 51,836.40
	Site Welfare including transportation and servicing	2	weeks	£ 950.00	£ 1,900.00

#### 4 LATE SUBMISSION - SUTTON PARISH COUNCIL (REP6-012 AND REP-013)

Response	Applicant's Response
<b>REP6-012 – Minutes of Parish Council meeting held 20 April 2022</b>	
<p><b>MINUTES OF THE PARISH COUNCIL MEETING HELD at 7.30 pm on 20th April 2022 in ST. MICHAEL AND ALL ANGELS' CHURCH, NENE WAY, SUTTON</b></p> <p><b>Members of the Council Present:</b> Councillors Anne Bodily, Ann Burden, Antony Eager, Mick Grange (Chairman) and Robbie Reid</p> <p><b>In Attendance:</b> Five residents</p> <p><b>Agenda:</b> The Chairman explained that this special meeting had been called for the Parish Council to respond to the A47 Dualling Planning Inspector's Draft Statement of Common Ground (deadline 22/4/2022) and to respond to the letter from Peterborough City Council regarding the Planning Appeal for the Cycle West Project (deadline 04/05/2022).</p> <p><b>1) Apologies:</b> There were apologies for absence from Deirdre McCumiskey, Parish Clerk.</p> <p><b>2) Declaration of Interest:</b> Cllr Reid declared an interest in 4) as he is involved with discussions regarding the Station House.</p> <p><b>3) Approval of the Minutes of the Meeting held on 15th March 2022:</b> The Minutes of the Meeting held on 15th March 2022 were approved.</p> <p><b>4) A47 Highways England/Peterborough City Council:</b></p>	<p>The Applicant has no further comments as this supports the Applicant's proposal.</p>



	Response	Applicant's Response
	<p>A SOG (Statement of Common Ground) document has been compiled by the Inspector for Highways England and Sutton Parish Council to comment on and sign off to enable him to finalise his report.</p> <p>A summary of the on-line meetings was presented by the Chairman.</p> <p><b>Main Points for Discussion and Decision for PCC:</b></p> <p>Closure of the Drift in Sutton:</p> <ul style="list-style-type: none"> <li>• This was approved by the village residents on a previous date. The Drift to be closed to all motorised vehicles at a point just north of the Willowhayne land but available for leisure use for WCH</li> <li>• It has been accepted The Drift is not the historical entrance to the village.</li> <li>• Nene Way entrance has been approved as a sufficient standard for village safety and emergency access</li> <li>• Funds will be made available to improve and enhance the verges on The Drift</li> <li>• The Parish Councillors voted on the closure of The Drift, all five Councillors in were in attendance and all five Councillors voted in favour of it being closed. Also, the five village residents in attendance at the meeting also voted in favour of the closure of the Drift The Chairman read out the rest of the SOG document and the Parish Councillors agreed on each point raised in the document.</li> <li>• Demolition of the Station House - the building is listed in the Local List of Heritage Assets in Peterborough. The Parish Council support the process started by Cllr Reid to keep the building</li> </ul>	

	Response	Applicant's Response
	<p>within the Parish boundary, and as close to the railway bridge as possible.</p> <ul style="list-style-type: none"> <li>• It was noted that certain village concerns such as noise, screening and landscaping etc would need future village involvement and notes to this affect are being added to comments on the SOG document.</li> <li>• Upton's request for an under or overpass for WCR to prevent Upton and Sutton being severed was noted. There will be no challenge to this.</li> <li>• Wansford Parish Council's west roundabout traffic concerns were noted. There will be no challenge to this.</li> </ul> <p>The Parish Council approved the comments on the SOG document to be submitted.</p> <p><b>5) Planning Appeal for the Cycle West Project re Sutton Cycle Way:</b> Peterborough City Council had notified the Parish Council that the above Planning Appeal was to be dealt with by exchange of written statements and that the original comments of all parties would be forwarded on to the Inspector. However, any further comments could be submitted.</p> <p>After discussion it was concluded that there has been no change within the village regarding the previous decision to reject the proposal for a cycle way through Sutton. The Chairman will emphasise the village concerns about adverse environmental impact which had been well expressed in the Planning Officer's report.</p> <p>All the Parish Councillors were in agreement with this.</p> <p><b>6) Any Other Business:</b></p>	



	Response	Applicant's Response
	<p>a) Helen Facer confirmed that Sutton Lodge had been subject to the Self Build Exemption from CIL (Community Infrastructure Levy).</p> <p>b) Queen's Platinum Jubilee Celebrations in the village - the Parish Councillors to agree some low-level financial support.</p> <p><b>7) Date of Next Meeting:</b> The Annual Parish Meeting followed by the Annual General Meeting at 7.00 pm on 17th May 2022 in St Michael &amp; All Angels' Church.</p> <p>Deirdre McCumiskey Parish Clerk</p>	
<b>REP6-013 Deadline 6 Submission - Late submission accepted at the discretion of the Examining Authority</b>		
	<p>As requested Sutton Parish council has provided minutes confirming our desire to close The Drift in Sutton to motorised traffic other than for farm and residential access. As the village had a number of new residents since our previous request for closure SPC decided to raise the question again. At the meeting held on 24 April 2022 councillors unanimously reiterated their previous position in requesting closure of The Drift. Residents in attendance of the meeting unanimously supported the councils decision. Minutes of meeting attached.</p>	<p>The Applicant has no further comments, as this supports the Applicant's proposal.</p>