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10<sup>th</sup> December 2023

Ms Dominey  
Secretary of State for Transport  
The Department for Transport  
Great Minster House  
33 Horseferry road  
London SW1P 4DR

By Email to [transportinfrastructure@dft.gov.uk](mailto:transportinfrastructure@dft.gov.uk)  
Cc: A47WansfordtoSutton@planninginspectorate.gov.uk

Dear Ms Dominey

REQUEST FOR COMMENTS FROM ALL INTERESTED PARTIES IN RESPONSE TO THE 27<sup>th</sup>  
January and 3<sup>RD</sup> February 2023 CORRESPONDENCE.

Thank you for allowing me to respond to the above process as STAKEHOLDER within this scheme.

#### WITTERING BROOK

Natural England refer to the issue of a bats licence but make no reference to the re-routing of Wittering Brook and the straightening of the meanders towards the River Nene. The removal of the weir and the original stone culvert this will lower the water level backing up towards land within the Sutton Heath SSSI. The precise drainage conditions are an important element in the plant life which forms the reason for the SSSI. The new concrete culvert proposed is simply for cost reasons and does not respect the local environment.

#### CARBON EMISSIONS

With reference to the Carbon Table figures set out in the ES there appears to be no change of carbon loss between the arable soil to the north side of the present A47 compared to south side with its undisturbed pasture land. Taken from figures at Rothemstead, average soil contains 1 : 10 amounts of carbon. This is higher on alluvial and flood land soils while in arable land it drops to much less. Much also depends on the constituents of clay and bedrock. The ES tables offer no comparison or numbers for carbon liberated from soil disturbed during construction.

## DRAINAGE ATTENUATION POND

The Environment Agency appears to not answer the question but we hope the river Nene does not ever become so high it floods over the banks of the attenuation pond. The issue is that this is that the waste water contains traces of heavy metals, salt and hydrocarbons and potentially anything that leaks from a major road traffic incident. This will all settle out in the attenuation pond but it is right next to 2 watercourses and a reengineered floodplain. The contaminants will tend to leach out of the pond and, if the river floods, they will be flushed out in a single surge. Individuals, businesses, and farmers are prosecuted for the release of chemicals, fertilizer and hydrocarbons into waterways but National Highways are deliberately setting up a system where this will happen. It is unacceptable for National Highways (NH) to claim the proposed arrangement is an improvement in what is there presently. This road was built by the Romans when these issues were not high on the agenda. If the DCO had not been drawn so tightly to the road scheme on Homes England land, NH would have plenty of area to design the pond on arable land well away from the river. Can NH provide actual evidence of similar ponds near major water courses on the edge of floodplains?

I would also like to draw the Secretary of State for Transport's attention to the fact that NH were questioned in an email in October 2022 whether there would be any change of land take, so that we could sort out the "heads of terms" for land acquisition. In November at their update meeting the project manager at NH knew nothing about the changes to the ponds. Only the team leader at Galiford Try (GT) knew about them. It then took to January to get a detailed design map of the new arrangements. I have been told it's only a small design change within the DCO and basically GT can do what they like. It is clear that NH has surrendered control of this project to Galiford Try.

## OVERHEAD CABLES

With the new pond design we found out that, due to costs, the power cables and services are now all to be over head cables running close to the river. During the Planning Inspectorate (PI) stage the NH lawyer confirmed these were going in ducting along the proposed WCHER route for both maintenance and egress. It was pointed out by the PI that, if left in place, these cables would be in the way of any decent mitigation on the slopes to protect the Nene Valley and River from light, air and noise pollution. This change in plan also threatens the breeding swans we have on the river as they are not very good at changing direction when taking off and the new power lines would be right in their flight path. NH and GT have offered up zero mitigation on our part of the County Wildlife Site (CWS). You cannot plant trees under power cables. NH claim they have a biodiversity net gain of 32% over the whole scheme, but it is at serious detriment to the CWS and that will never recover to its present biodiversity levels. NH have cut off the wildlife corridor from Sutton Heath via the disused railway and they are leaving the route to Wansford permanently compromised. I have been instructed to apply to Designated Funding for mitigation, but that's now short of money as they propose to spend at least 250k on moving a heritage building out of the community, plus a cycleway in Nene Park Trust that was rejected by the local community.

## CONCLUSION

This process by NH has been a shambles, and with this present design we are deciding if we can even negotiate a new "heads of terms". I will be faced with the threat of compulsory

purchase by the government when all I want to do protect the environment within the CWS for the future. It's worth pointing out this was a project brought forward to NH to develop based on the document put forward by ENZYGO consultants, SSPLOG overview of SEP objectives by Greater London Authority 2016 and is described on page 40. This project had its origins in the developing of land held by Homes England. So why does our local environment need to suffer because of the poor decision makers within National Highways, Historic England, the Environment Agency and possibly Homes England. I may own this little bit of land but I am simply its present guardian. It does not earn much money and what is on offer is more than it would ever earn, but I have a duty to stop or get proper mitigation for the environment, for all our futures.

I have never wanted to stop the construction of this road, it just needs to be in the correct place and place the present environment at the top of the agenda. Can there be a pause on this project to give time for National Highways to sort out these present design issues?

With Regards

R. W. Reid

