

**M54 to M6 Link Road
TR010054**

**8.8 LA(A) Draft Statement of Common
Ground with Staffordshire County
Council**

APFP Regulation 5(2)(q)

Planning Act 2008

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

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

M54 to M6 Link Road
Development Consent Order 202[]

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STATEMENT OF COMMON GROUND

This Statement of Common Ground has been prepared and agreed by (1) Highways England Company Limited and (2) Staffordshire County Council.

Signed.....

Andrew Kelly

Project Manager

on behalf of Highways England

Date: [DATE]

Signed.....

[NAME]

[POSITION]

on behalf of Staffordshire County Council

Date: [DATE]

DRAFT

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1. Introduction

1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground ('SoCG') has been prepared in respect of an application for a Development Consent Order ('the Application') under section 37 of the Planning Act 2008 ('PA 2008') for the proposed M54 to M6 Link Road ('the Scheme') made by Highways England Company Limited ('Highways England') to the Secretary of State for Transport ('Secretary of State').
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available on the Planning Inspectorate website.
- 1.1.3 This SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the Examination.
- 1.1.4 **This SoCG has been drafted by Highways England based on correspondence with Staffordshire County Council during the development of the Scheme and records the matters agreed and not agreed. The draft was provided to Staffordshire County Council on 25 October 2020. Comments were received on 3 November 2020 and have been incorporated into this draft.**
- 1.1.5 **Highways England will continue to work to finalise the contents of this SoCG at the earliest opportunity as the Application proceeds through the Examination process.**

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by (1) Highways England as the Applicant and (2) Staffordshire County Council (SCC).
- 1.2.2 Highways England became the Government-owned Strategic Highways Company on 1 April 2015. It is the highway authority in England for the strategic road network and has the necessary powers and duties to operate, manage, maintain and enhance the network. Regulatory powers remain with the Secretary of State. The legislation establishing Highways England made provision for all legal rights and obligations of the Highways Agency, including in respect of the Application, to be conferred upon or assumed by Highways England.

- 1.2.3 SCC is the upper-tier local authority for the non-metropolitan county of Staffordshire. It is the local highways authority for the area in which Scheme is located and the decision-maker on planning applications considered 'county matters', primarily applications for minerals and waste developments.

1.3 Terminology

- 1.3.1 In the tables in the Issues chapter of this SoCG, 'Not Agreed' indicates a final position. 'Under discussion' indicates where points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties. 'Agreed' indicates where the issue has been resolved.
- 1.3.2 It can be taken that any matters not specifically referred to in the Issues chapter of this SoCG are not of material interest or relevance to SCC, and therefore have not been the subject of any discussions between the parties. As such, those matters can be read as agreed, only to the extent that they are either not of material interest or relevance to SCC.

2. Record of Engagement

2.1.1 A summary of the meetings and correspondence that has taken place between Highways England and SCC in relation to the Application is outlined in Table 2.1. A list of the initials, names, role and organisation of the people mentioned in the Table is included at Appendix A.

Table 2.1: Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes
16/10/2018	Email from SG (Amey) to SL (SCC) and follow up on 16/11/2018	Seeking a meeting on 22/10/2018 to discuss potential impact on Lower Pool Site of Biological Importance (SBI). Follow up reiterating above for meeting on 23/11/2018.
25/10/2018	Email from HMac (AECOM) to SBI (SCC)	Draft Written Scheme of Investigation (WSI) for the Ground Investigation (GI) sent to SCC for review.
02/11/2018	Email from SK (SCC) to HMac (AECOM)	Regarding SCC charges for input on DCO applications.
14/11/2018	Email from LB (AECOM) to JB (SCC)	Requesting comments on proposed viewpoint locations for the Landscape and Visual Impact Assessment (LVIA).
14/11/2018	Email from JB (SCC) to LB (AECOM)	Confirmation from SCC that viewpoint locations for the LVIA are acceptable and suggesting an additional one.
16/11/2018	Email from SL (SCC) to GS (Amey)	Agreement to meeting on 23/11/2018.
16/11/2018	Email from GS (Amey) to SL (SCC)	Advising that Amey is currently undertaking surveys and requesting a meeting re potential impacts on the Lower Pool SBI.
19/11/2018	Email from TB (Amey) to JC (SCC)	Requesting technical meeting with SCC / HE on 14/12/2018.
23/11/2018	Meeting with SL, DC (SCC) & AS (AECOM)	Informal discussion re initial scoping of topics.
28/11/2019	Email from SK (SCC) to HMac (AECOM)	SK has reviewed the WSI for archaeological monitoring of GI trial pits and is satisfied with the methodology and approach proposed. Also provides advice re SCC charges.
14/12/2018	Meeting with SCC, HE, Amey and AECOM including PM's, Highways, Environment, Ecology, Heritage, Landscape and Traffic	Technical progress update on timeline for project, surveys, design details. Outline of key elements of scheme and potential environmental issues relating to heritage, ecology, landscape and archaeology. AECOM requested contact information and other information to assist data collection. JC confirmed he is the SCC main point of contact for the project. Discussion of Highways matters but no agreements reached at this stage.
04/01/2019	Email from SG (Amey) to SL (SCC)	Advising that method statement for GI in preparation and asking whether SCC requires notification of intent to carry out works.

Date	Form of correspondence	Key topics discussed and key outcomes
13/01/2019	Meeting between HE and SCC	Meeting between HE and SCC traffic modelling teams.
14/01/2019	Email from JK (SCC) to NP (AECOM)	Requesting update on Local Model Validation Report (LMVR) sign off.
15/01/2019	Email from NP (AECOM) to JK (SCC)	Confirming LMVR had been signed off. NP to send to JK via WeTransfer.
15/01/2019	Email from JK (SCC) to NP (AECOM)	Confirming receipt of LMVR sent on 15/01/2019.
15/01/2019	Email from NP (AECOM) to ND (SCC)	Providing meeting minutes from modelling team meeting on 13/01/2019.
24/01/2019	Email from SL (SCC) to SG (Amey)	Enquiring about the possibility of including a Crayfish Ark site within the scheme.
05/02/2019	Email from FL (AECOM) to SK (SCC)	Attaching WSI for review and comment.
05/02/2019	Email from SK (SCC) to FL (AECOM)	Acknowledging request in previous email and information re SCC's time charges.
08/02/2019	Emails from SK (SCC) to FL (AECOM)	Has looked at WSI and plans and is 'generally happy' with proposals. Asking for clarity on why there are 'blank spots' within the red line not covered by the survey. Follow up email requesting a monitoring visit asap.
08/02/2019	Email from TB (Amey) to KH (SCC) & RR (AECOM)	Sending draft SoCC for review prior to meeting.
11/02/2019	Email from FL (AECOM) to SK (SCC)	Response to SK's email of 08/02/2019. WSI will be updated and plan annotated to explain 'blank spots'.
12/02/2018	Email from TB (Amey) to KH (SCC)	Presentation for Cabinet attached for SoCC meeting arranged for 12/12/18.
14/02/2019	Email from SK (SCC) to HMac (AECOM)	Asking for thoughts and how to proceed re utilising designated funds. Two suggestions put forward: <ol style="list-style-type: none"> 1. Works to Portobello Tower 2. Conservation and remediation of historic milemarkers
05/03/2019	Email from JC (SCC) to TB (Amey)	To acknowledge meeting on 13/03/2019 and asking if 'minerals' is to be covered by Geology.
13/03/2019	Meeting with SCC, AECOM and Amey, including PMs, highways, ecology, archaeology, geology, traffic and environmental	Update on survey work. Requests for information from SCC on geology/contaminated sites. SCC confirmed their contacts. Ecologist confirmed mammal crossings to be included. A designated funds session to be arranged. Discussed scoping report comments, legacy works for A460 – gateway features idea approved by SCC, and highways matters including possible weight restriction for HGVs to be included in DCO (this will be

Date	Form of correspondence	Key topics discussed and key outcomes
		raised at the Examination if not). Agreed to internal discussions on both sides before meeting. AECOM advised TRO work to be progressed after DCO, at detailed design stage. Potential stop-up of Mill Lane discussed.
18/03/2019	Email from HH (AECOM) to JC (SCC)	Request for CA's email address to consult on approach to flood risk assessment.
18/03/2019	Email from HH (AECOM) to CA (SCC)	Attaching FEH Catchment Map. Request for meeting to discuss approach to construction of hydraulic HEC-RAS models to understand potential flood risk.
19/03/2019	Email from TB (Amey) to JCa (SCC)	Advising that statutory public consultation will run from late May-July 2019. Looking to involve LEP in consultation engagement.
20/03/2019	Email from FL (AECOM) to SK (SCC)	Attaching final version of updated WSI. Informing that geophysical survey will begin on site on 25/03/2019 using a MACE where suitable. Offer to SK to visit site.
20/03/2019	Email from TB (Amey) to AMcN, TP, AS, HH (AECOM), JC, SH, SL, SK, WS (SCC)	Attaching meeting minutes from 13/03/2019.
20/03/2019	Email from JC (SCC) to TB (Amey)	Inviting TB to a District Director's Group Meeting (20 min slot). LEP and CoC also attend.
26/03/2018	Email from TB (Amey) to JC (SCC)	Asking if a slot could be allocated at the District Director's Group Meeting for TB on 03/05/19.
02/04/2019	Email from TB (Amey) to JC (SCC)	Advising that informal consultation taken place with SSC regarding the SoCC and formal consultation will take place wb. 08/04/2019 with SCC, SSC and WCC. Also suggesting a time for a meeting with SCC re A460/ Legacy Works and HGV usage of A460 (M6 Diesel).
03/04/2019	Email from JC(SCC) to TB (Amey) and ND (SCC)	SCC has discussed HGV usage of A460 (M6 Diesel) internally and have concerns that need addressing in a meeting tba. Suggested HE be present and a planning/legal adviser to give advice on what can/ cannot be provided under the scope of the DCO.
03/04/2019	Letter from AK (HE) to Dr Harling (SCC Dir. of Health)	Requesting comments on methodology and study area relating to Human Health Assessment section of ES. Requesting information on local health issues.
04/04/2019	Email from TP (AECOM) to JC (SCC)	Attaching above letter to Dr Harling for JC to pass on to him. Also attaching a noise location plan and PINS scoping comments (SCC only). Email includes a table of topics to be included in ES which includes PINS scoping comments. Requesting SCC contacts information for consultation purposes.
10/04/2019	Email from TB (Amey) to JC (SCC)	With ref. to email of 03/04/19 re meeting to discuss A460 legacy works, suggesting a meeting after the District Directors meeting on 03/05/2019.

Date	Form of correspondence	Key topics discussed and key outcomes
11/04/2019	Email from TB (Amey) to JC, ND, WS (SCC)	Confirming meeting on 03/05/2019 to discuss/understand key concerns raised in previous meeting re A460 legacy works and HGV usage – also, to confirm SCC views ie. support or opposition of the scheme before statutory consultation at end of May.
12/04/2019	Email from JFr (S&S LEP) to TB (Amey)	Asking for confirmation of Executive Board meeting on 16/04/2019.
16/04/2019	Meeting at Chase Chamber of Commerce attended by TB (Amey) and DB (AECOM)	Presentation of proposals and update on timescales for scheme.
17/04/2019	Email from HH (AECOM) to CA (SCC)	Reiterating question re whether SCC require to be consulted as per email of 18/03/2019.
18/04/2019	Email from TB (Amey) to JFr/JCa (S&S LEP)	Asking for minutes of Board meeting and any other details. Also seeking to ascertain if the LEP will assist in promoting statutory consultation on their internal/external website.
18/04/2019	Email from Chase CoC to TB (Amey)	Attaching minutes of Board meeting for comment.
22/04/2019	Email from HH (AECOM) to CA (SCC)	Attaching map showing modelling approach, coverage and indicative drainage strategy drawing. Asking for further thoughts.
23/04/2019	Email from TB (Amey) to various at SCC Highways and TK (HE)	Draft of the M54 to M6 Link Road, Parish Councillor Q&A document (following the previous Parish Councillor Forum (No 2) held on 6/3/2019). Scheme plan being finalised so not attached. Q&A to form part of the Agenda of PC Forum (No 3) on 24/04/19 - focus on explaining the upcoming Statutory Consultation.
24/04/2019	Email from JC (SCC) to TP (AECOM)	Attaching information from Staffordshire and Stoke-on-Trent Air Quality project 2018-20 for AECOM to utilise. Email also responds to letter of 03/04/2019. Health Lead requires crime reduction and community safety to be addressed in ES. Agrees there are clear community safety benefits in removing traffic from A460. Methodology on Human Health Determinants is supported. Active Travel Plans are essential as is awareness raising and behaviour changes. SCC can support this.
01/05/2019	Email from GH (SCC) to AK (HE)	Email regarding limits of responsibility between SCC and HE regarding street lighting. Query on proposals for A460 street lighting post construction of the Scheme.
03/05/2019	Presentation then Meeting with JC and WS (SCC), GL (HE) and TB (Amey)	Project update to Staffs Growth Development meeting. SCC meeting included updates re meetings, receipt of information. SCC to pass on traffic count information. JC requested weight limit on A460 to remove HGV post project. GL agreed to consider – not currently part of proposals. Discussion on land ownership.

Date	Form of correspondence	Key topics discussed and key outcomes
13/05/2019	Email from DT (Amey) to DV (SCC)	Email requesting confirmation that the use of low noise surfacing is acceptable to SCC.
15/05/2019	Email from DV (SCC) to DT (Amey)	Confirmation of surfacing requirements from SCC.
10/05/2019	Email from HH (AECOM) to CA (SCC Flood team)	Advising of EA meeting and need consult SCC re FRA and surface water drainage strategy. Asking for a response to previous emails dated 13/03/2019 and 17/04/2019.
10/05/2019	Email from CA (SCC) to HH (AECOM)	Response to previous emails suggesting a call/meeting.
17/05/2019	Email from HH (AECOM) to CA (SCC)	Requesting a meeting at end of May 2019.
20/05/2019	Email from TP (AECOM) to JC (SCC)	Acknowledging email of 24/04/2019 and agreeing to content of Health assessment. Requesting SCC contacts for landscape and water quality.
21/05/2019	Email from CA (SCC) to HH (AECOM)	Confirming a meeting date of 10/06/2019 and requesting outline plans/information in advance.
22/05/2019	Email from HH (AECOM) to CA(SCC)	Attaching map showing modelling approach and coverage and the indicative drainage strategy drawing, and meeting agenda.
22/05/2019	Letter from AK (HE) to JC (SCC)	Letter attaching a response to SCC comments on the SoCC comprising a change to a typo.
23/05/2019	Letter from AK (HE) to SCC	Letter providing notice of the statutory consultation from 24 May 2019 to 5 July 2019.
06/06/2019	Email from TB (Amey) to JC (SCC)	Attached WCHAR assessment for review and comment. Another technical meeting requested to go through current details, post consultation.
07/06/2019	Email from DT (Amey) to SH, JC (SCC) & TB(Amey) & AW (HE)	Requested meeting to discuss the scheme re: highway alignment/ junction design for the main line and side roads. Once constructed, main line will remain part of the HE's SRN. Some of new highways (tbd) will revert back to the LA. Requested whether a Staffordshire Highway Design Guide and Standards exists. Current scheme designed to Design Manual for Roads and Bridges (DMRB) standards.
10/06/2019	Email from JC (SCC) to DT (Amey)	Confirmation that Hilton Lane should be designed to DMRB standards.
10/06/2019	Meeting with LLFA including CA (SCC), HH, TP & SB (AECOM)	Initial meeting with lead local flood authority (LLFA) to discuss approach to flood modelling and drainage design. SCC confirmed consents required for culverts. LLFA need to review FRA report and drainage strategy. LLFA pleased with 40% climate change allowance on all pond design. EA will review HAWRAT, not LLFA.

Date	Form of correspondence	Key topics discussed and key outcomes
13/06/2019	Email from FL (AECOM) to SK (SCC), TP (AECOM), TB(Amey) & HM (Tyler Grange)	Advising that archaeological assessment works are ongoing. Sending a geophysical survey of area for review and comment. Request for a meeting to discuss next phase of work and any comments re EIA. GI results will be available by then.
14/06/2019	Email from SK (SCC) to FL (AECOM)	Arranging a telephone meeting.
18/06/2019	Meeting with AECOM/Amey, HE and SCC	Meeting to review current signage design for the scheme including; extents of Motorway Regs, A449 and A460 works, Name of link, Featherstone or "local traffic only", Signing of M6 Toll and Amendments to signage at M6 J11 and 12.
25/06/2019	Meeting with SCC, AECOM and HE, including PM's and Highways	Discussed speed limit reduction and lighting on Hilton Lane; closure of Dark Lane and potential impacts; A460 link to Featherstone tie in – various options; Potential closure of Mill Lane; PRoW – Dark Lane, Brookfield Farm, land north of Moseley Old Hall; possible weight restriction on sections of A460 raised.
27/06/2019	Email from SK (SCC) to FL (AECOM)	Confirmation of call to discuss geophysical survey.
27/06/2019	Conference call with SK (SCC), FL & HMac (AECOM)	Call to discuss the results of the geophysical survey. Notes following on are in email of 24/7/2019 from HMac to SK.
05/07/2019	Letter from SCC to HE	Letter from Cllr Mark Winnington providing SCC's statutory consultation response
14/07/2019	E-mail from FL (AECOM) to SK (SCC)	Summary e-mail of conference call on 27/06/2019.
15/07/2019	Email from MW (SCC) to PA (HE)	Comments on PIER received.
15/07/2019	Email from HH (AECOM) to CA(SCC)	Attaching meeting minutes from 10/06/2019 and images of the culvert survey. Advising that AECOM are to meet with EA. Request for information on the A460 culvert re policy requirements for freeboard margin.
18/07/2019	Email from HH (AECOM) to CA, JCo and SCC Flood Team (SCC)	Referring to AECOM's meeting with EA and need to arrange a joint LLFA and EA meeting asap prior to Design Fix 3b.
22/07/2019	Email from HH (AECOM) to CA (SCC), JCo (EA), TP (AECOM) & TB (Amey)	With ref to email 18/07/19, EA has offered a meeting room for a joint LLFA and EA meeting. List of dates and times offered.
23/07/2019	Email from HM (Tyler Grange) to SL (SCC) & TB (Amey)	Introduction advising that HM will be new project co-ordinator of ecological inputs for the Environmental Statement (ES). With TP Suggested it may be useful to attend a joint EA and LLFA meeting wc 5 th August and requesting a pre-meeting to discuss progress re ecology.

Date	Form of correspondence	Key topics discussed and key outcomes
24/07/2019	Email from HMac (AECOM) to SK (SCC)	Reasoning for deferring evaluation trenching until post-consent stage. In light of the low archaeological potential and planned future refinement of the scheme design, written agreement to this is requested.
25/07/2019	Email from SK (SCC) to HMac (AECOM)	Confirmation from the County Archaeologist that evaluation trenching can be postponed until the post-consent stage. Reminder that works should be carried out as early as possible in the post-consent process in order to enable the development and execution of additional mitigation works should these be deemed appropriate and necessary based on the results of the evaluation.
26/07/2019	Email from AS (AECOM) to JF (EA), CA & SL (SCC), HM, TP, HH (AECOM) & TB (Amey)	Attached agenda/attendees list for the M54-M6 Scheme Watercourse crossing meeting on 06/08/2019. AECOM require opinion of either the EA or LLFA hydromorphologist (if SCC have an equivalent person?). Queries can be addressed by EA if sent in advance of the meeting.
29/07/2019	Email from RW (AECOM) to SL (SCC)	Query regarding additional viewpoints and the inclusion of night time views. Arranging a meeting to discuss the viewpoints and environmental mitigation.
30/07/2019	Meeting with DT (Amey), JC & SH (SCC), AK (HE) & AMcN (AECOM)	Meeting to discuss the highway maintenance boundary between HE and SCC following the construction of the new link.
30/07/2019	Emails from SB (SCC) to RW (AECOM)	Arranging a meeting to discuss the viewpoints and environmental mitigation.
01/08/2019	Email from RW (AECOM) to SL (SCC)	Arranging a meeting to discuss the viewpoints and environmental mitigation.
02/08/2019	Meeting with SL, HP (SCC), RW, TP & AS (AECOM) & HM (Tyler Grange)	Agreement reached on new landscape viewpoints and also to include heritage viewpoints in Cultural Heritage Chapter providing liaison on mitigation occurs. Agreement to scope out assessment of Hazel Dormouse. Update on species surveys and discussions with Natural England. Agreed to circulate Environmental aspects of SCC SoCG to JC & SL (SCC). SCC require HEGS assessment for those hedgerows being lost.
02/08/2019	Email from AS (AECOM) to JF (EA), SL, CA (SCC), TP (AECOM) & TB (Amey)	Sending presentation slide with details of watercourse crossing for discussion at meeting on 06/08/2019.
05/08/2019	Meeting with BK, JT (HEng), SK (SCC), AK, JH (HE) & HMac, KK, TP, AS (AECOM)	Progress update on archaeology, cultural heritage, mitigation design and Dark Lane Alignment. No agreements reached at this stage.
06/08/2019	Meeting JF et al (EA), SL, CA (SCC), HH,	Detailed update on watercourse crossing design proposals. SCC require model scenarios. Update on ecology and provision for

Date	Form of correspondence	Key topics discussed and key outcomes
	AMc, TP, AS (AECOM) & HM (Tyler Grange)	mammals resulting from watercourse changes. Update on Flood Risk.
13/08/2019	Meeting with SCC and AECOM, including PM's and Highways	To discuss possible highway boundary positions following the opening of the new link road; access for Hilton Lane and Dark Lane during construction; A460 link to Featherstone tie in and old A460 south of The Avenue.
13/08/2019	Email from TP (AECOM) to SK (SCC)	Attaching M54 built heritage technical note for information.
28/08/2019	Email from AS (AECOM) to SL (SCC)	Attaching minutes from ecology meeting on 02/08/19.
28/08/2019	Email from AS (AECOM) to SL & CA (SCC)	Attaching minutes and slides from EA/ LLFA meeting re watercourse crossings on 06/08/19 requesting comments.
31/10/2019	Email from RW (AECOM) to SL (SCC)	Emails to SCC asking if there are any areas of tranquillity in proximity to the scheme that require consideration.
02/09/2019	Email from RW (AECOM) to SL (SCC)	Requesting information on any quiet or public areas around the scheme, valued for the tranquillity, acoustic and landscape quality.
30/09/2019	Email from AMa (AECOM) to JC (SCC) and GM (SSC)	Spreadsheet of long list of developments to be considered in the cumulative assessment. Shapefile send and a request for a review of the allocations and applications listed to ensure no developments have been missed. Further details on construction timescales were also requested.
09/09/2019	Meeting with TB, AL, JH (AECOM) and JC (SCC)	Meeting to provide project update post statutory consultation and provide handover of SCC relationship from TB to AL.
16/09/2019	Email from DT (Amey) to JC (SCC)	Providing minutes of meeting on 13/08/19 and existing maintenance boundary plan.
30/09/2019	Email from AMa (AECOM) to JC (SCC) and GM (SSC)	Spreadsheet of long list of developments to be considered in the cumulative assessment. Shapefile sent and a request for a review of the allocations and applications listed to ensure no developments have been missed. Further details on construction timescales were also requested.
11/10/2019	Email from MG (SCC) to AMa (AECOM)	Provision of detail for mineral applications within 4 km of the Scheme.
14/10/19	Email from AL (AECOM) to JC (SCC).	To propose dates and times for future meeting. AL suggested workshop between 10:30-15:00 either on 22 nd or 24 th October 2019.
15/10/19	Email from JC (SCC) to AL (AECOM).	Requesting later dates to be proposed. Suggested phone call in meeting in meantime.
15/10/19	Email from AL (AECOM) to JC (SCC).	AL suggested alternative dates w/b 4 th November (excluding 05.11.19). Agreed phone call in meantime.

Date	Form of correspondence	Key topics discussed and key outcomes
16/10/19	Email from AL (AECOM) to JC (SCC).	Follow up from phone call and attached agenda for upcoming meeting. AL requested phone number for person to speak to re traffic modelling.
16/10/19	Email from JC (SCC) to AL (AECOM).	To confirm date of 06.11.19 for meeting and proposing outline agenda/timings. JC to speak to SCC modelling expert.
17/10/19	Email from JC (SCC) to AL (AECOM).	Informing AL of discussion with SCC colleague Nick Dawson re modelling issues.
31/10/2019	Email from RW (AECOM) to SL (SCC)	Requesting information on the quiet and public areas around the scheme which are valued for their tranquillity, acoustic and landscape quality/environment. Following request from Public Health England to consider tranquillity in greater detail.
31/10/2019	Email from RW to SB (SCC)	Requesting information on the quiet and public areas around the scheme which are valued for their tranquillity, acoustic and landscape quality/environment. Following request from Public Health England to consider tranquillity in greater detail.
06/11/2019	Meeting with RR, AL, NP, AMcN (AECOM), SB (BAM), JC, SH, WS (SCC), AK & SC (HE)	<p>Minor changes to draft order limits advised and revised areas of land acquisition are being/will be consulted on.</p> <p>AL confirmed that HE was not intending to include a weight restriction in the DCO application because the Scheme significantly reduced HGV traffic and the traffic modelling did not suggest a need for one .</p> <p>AL proposed legal agreement to monitor HGV traffic on A460 post construction. This was offered as a compromise so that action could be taken should the HGV traffic along the A460 be greater than predicted to the extent that action is necessary. HE & SCC to consider a usage threshold to trigger management response.</p> <p>SCC supported de-classification of existing A460 as part of DCO if possible.</p> <p>Meeting to discuss legacy works through designated funds tba. SCC agreed there are no expectations that problems on A460 Lodge Link Lane will be resolved by scheme.</p> <p>Clarity to be provided to SCC on long-term road/drainage pond ownership/management. SCC to provide existing TROs. SCC happy with proposed approach re TMP. SCC wish to comment on DCO prior to submission and approve design of works which will be handed over to them.</p>
11/11/2019	Letter from HE to SCC	Letter notifying of non-statutory supplementary consultation, 11 November 2019 – 11 December 2019.
12/11/2019	Email from AL (AECOM) to JC (SCC)	Advising that a full list of meetings and correspondence with SCC is being compiled and advising that AECOM and SCC traffic team are meeting to discuss the traffic model.
12/11/2019	Email from JC (SCC) to AL (AECOM)	Advising that previously for other DCO schemes, SCC has been in a more advanced position eg. having input into the wording of the draft Order to a point of local approval, having draft EIA

Date	Form of correspondence	Key topics discussed and key outcomes
		chapters and an advanced SoCG. He will liaise with colleagues and reflect.
13/11/2019	Email from AL (AECOM) to JC (SCC)	Attaching draft minutes of meeting on 06/11/2019 for comment. Advised that a draft DCO can be made available at an appropriate time to avoid repeat reviews. Also, ES chapters will be shared when ready for review, once approved for issue by HE. Liaison has been taking place with the SCC Ecologist, Archaeologist, Landscape and LLFA on approach.
14/11/2019	Email from AL (AECOM) to JC (SCC)	Attaching the draft DCO for comment.
18/11/2019	Email from JC (SCC) to AL (AECOM).	Confirming receipt of draft DCO. JC asked AL to liaise with Heather in SCC legal team re cost undertaking.
18/11/2019	Email from JC (SCC) to AL (AECOM).	Requesting one of the project team to liaise with Anthony Bamsey (SCC Skills and Further Learning Manager) re employment and/or training benefits/opportunities.
19/11/2019	Email from TP (AECOM) to SK (SCC)	Attaching minutes of meetings with Historic England in August for review. Advised that Heritage chapter will be sent for review by end of week – delay due to incomplete noise modelling. Review requested by 13/12/2019.
20/11/2019	Email from TP (AECOM) to CA (SCC)	Advising that draft EIA completed and attaching draft FRA for review by 11/12/2019.
20/11/2019	Email from SK (SCC) to TP (AECOM)	Agreement on minutes from Historic England meetings and to 3-week review period for Heritage chapter.
22/11/2019	Email from TP (AECOM) to SK (SCC)	Attaching Heritage chapter and appendices for review and comment by 13/12/2019.
22/11/2019	Email from JC (SCC) to AL (AECOM)	Attaching an amended version of the 06/11/2019 meeting minutes and a summary of a telecon with AL re: level of agreement and understanding of broader scheme elements; weight restriction on A460; further discussion needed re approval of detailed design by SoS; facilitating agreement where possible prior to Examination and full understanding of mitigation package. SCC will continue to update Members on the Scheme.
25/11/2019	Email from AL (AECOM) to JC, SH, WS (SCC), AK, SC (HE), RR, AMc, NP (AECOM), SBe (Link-Connex)	Attaching final minutes for workshop meeting on 06/11/2019 and summary of agreed actions
26/11/2019	Email from SC (HE) to JC, SH, WS (SCC), AK (HE), AL, RR, AMcN, NP (AECOM), SBe (Link-Connex)	Advising that the Midlands Interchange will submit a DCO application in February 2020.

Date	Form of correspondence	Key topics discussed and key outcomes
26/11/2019	Email from AL (AECOM) to JC, SH, WS (SCC), AK, SC (HE), RR, AMcN, NP (AECOM), SBe (Link-Connex)	Advising that the DCO application for West Midlands Interchange (WMI) Examination has finished and may be due to be determined in February 2020, rather than being submitted. Also clarifying an action from the meeting.
26/11/2019	Email from JC (SCC) to SC, AK (HE), AL, RR, AMc, NP (AECOM), SH, WS (SCC), SBe (Link-Connex)	Advising that HE's development management team undertook an assessment of the WMI application and TA in liaison with SCC Highways.
26/11/2019	Email from TP (AECOM) to CA (SCC)	Attaching preliminary Water Framework Directive for review by 17/12/2019.
26/11/2019	Email from CA (SCC) to TP (AECOM)	Advising that CA will liaise with the EA regarding the WFD and FRA.
10/12/2019	Email from JC (SCC) to HE	Response to non-statutory supplementary consultation.
12/12/2019	Email from SK (SCC) to TP (AECOM)	Response to draft Cultural Heritage Chapter of ES stating satisfaction that most of his comments and queries arising from scoping have been addressed. Requesting clarity that preservation in situ has not been discounted and when the evaluation trenching will be carried out. Happy with built environment and landscape but defer to Historic England. Note noise modelling is outstanding. Seeking further review from SCC's Landscape Advisor. Seeking clarity as to whether SCC's Conservation Officer has been consulted.
16/12/2019	Email from SK (SCC) to TP (AECOM)	Attaching additional comments from the landscape advisor re the potential impact of the proposals on the historic landscape.
17/12/2019	Email from HH (AECOM) to CA (SCC)	Requesting a timescale for receipt of comments on the FRA and WFDa. Requesting a meeting in the New Year re abstraction licences for dewatering and groundwater for the Scheme.
17/12/2019	Email from TP (AECOM) to SL (SSC)	Attaching draft Landscape and Visual chapter of ES, the Masterplan overview and outline Environmental Management Plan for comment. Advised Biodiversity chapter to follow.
18/12/2019	Email from AL (AECOM) to JC (SCC)	Attaching a draft Heads of Terms re monitoring vehicular use of the A460 Cannock Road post construction for review and comment. Requesting details of SCC's solicitor re liaison on agreement.
18/12/2019	Email from AMc (AECOM) to JC, SH (SSC)	Attaching proposed maintenance boundaries between strategic and local road networks for discussion proposing the strategic network is maintained by HE and the local network and continuation of Cannock Road by SCC.

Date	Form of correspondence	Key topics discussed and key outcomes
20/12/2019	Email from TP (AECOM) to SL (SCC)	Attaching Biodiversity Chapter of ES for review and comment. Asking if SCC wish to see the noise and air quality chapters, which are being sent out to SSC and CWC.
31/12/2019	Emailed from JC (SCC) to AL (AECOM)	Requesting clarification on the form of 'agreement' for Head of Terms and how it will be presented in the application for ExA. Confirmed SCC's position remained the same, that a weight limit on the A460 should form an integral part of the overall scheme and be included in the DCO.
07/01/2020	Email from AW (AECOM) to CA (SCC) & OT, SBa (AECOM)	Seeking a meeting to review a list of water consents, licences & permits required for construction of the Scheme. Also chasing comments on the draft FRA, pWFDa and hydraulic models by 14.01.2020 prior to submission.
09/01/2020	Email from AL (AECOM) to JC (SCC)	To suggest a phone call for an update on SCC review of all documents. AL responded to previous queries re proposal for Heads of Terms.
09/01/2020	Email from JC (SCC) to AL (AECOM)	Providing contact details for Heather Morgan (SCC solicitor), requesting the AECOM solicitor contact HM directly to discuss what form of 'agreement' is being considered.
09/01/2020	Telephone call between AL (AECOM) and JC (SCC)	Re working together. JC emphasised that SCC is fully supportive of the Scheme and do not wish to be in disagreement at Examination. He stated SCC wish to: <ul style="list-style-type: none"> - review (revised) draft DCO - resolve the weight restriction issue prior to exam - meet re HE carrying out works on SCC roads - meet to discuss weight restriction TN and legal agreement - comment on maintenance - continue to comment on draft ES chapters
09/01/2020	Email from S-PG (AECOM) to JC (SCC)	Attaching draft copies of protected provisions relating to statutory undertakers.
13/01/2020	Email from NP (AECOM) to ND (SCC)	Advising that he will be sending a cordoned version of the Link Road Stage 3 Model, providing some details and caveats and asking for confirmation that the caveats are acceptable.
13/01/2020	Email from ND (SCC) to NP (AECOM)	Confirming successful receipt of above and that he is happy to accept the information on the terms offered and previously discussed.
14/01/2020	Email from JK (SCC) to NP (AECOM) and ND (SCC)	Asking if the LMVR has been signed off yet.
14/01/2020	Email from CA (SCC) to AW (AECOM)	Requesting a copy of the water and drainage consents register re consents under S23 of the Land Drainage Act.
14/01/2020	Email from CA (SCC) to TP (AECOM)	SCC comments on the FRA and the EA comments on the pWFDa.

Date	Form of correspondence	Key topics discussed and key outcomes
14/01/2020	Email from AW (AECOM) to CA (SCC)	Seeking a meeting as per email of 07/01/2020 for 21 Jan 20.
15/01/2020	Email from AW (AECOM) to CA (SCC)	Attaching the water and drainage consents register for review. Requesting confirmation of the suggested meeting on 21/01/2020.
15/01/2020	Email from NP (AECOM) to JK, ND (SCC)	Confirming that the LMVR has been signed off and advising a copy will be sent.
16/01/2020	Email from TP (AECOM) to SK (SCC)	Attaching the Archaeological Mitigation Strategy for comment.
16/01/2020	Email from SK (SCC) to TP (AECOM)	Agreeing to provide comments on the Archaeological Mitigation Strategy by 23/01/20
21/01/2020	Conference call between OT (AECOM) and CA (SCC)	Discussion re the water and drainage consents register.
21/01/2020	Email from AL (AECOM) to JC (SCC)	Attaching the revised draft DCO for review or SCC, noting that submission version will be available by 30 January so review to await that version. Drawing attention to Article 10 provisions and Schedule 2 requirements 3,4,9 and 10, in response to previous concerns. Requesting a response from SCC legal representative to discuss the monitor & manage legal agreement and referring to previous discussion on ways to maximise benefits to the local areas.
21/01/2020	Email from JC (SCC) to AL (AECOM)	Confirming liaison regarding reviewing the draft DCO and asked for confirmation on who would be dealing with legal matters. Agreeing to a meeting in early February to discuss the weight restriction matter to conclude a position and asked AL to suggest some dates.
21/01/2020	Emails between AL (AECOM) and JC (SCC)	Making arrangements for meeting in February. AL confirmation that Gowlings are dealing with all legal matters on behalf of HE.
22/01/2020	Email from SK (SCC) to TP (AECOM)	Including minor amendments to the draft Archaeological Mitigation Strategy.
22/01/2020	Email from OT (AECOM) to CA (SCC)	Summary of points discussed re future drainage consents required. Requesting agreement in order to update draft SoCG.
27/01/2020	Letter emailed from SL (SCC) to TP (AECOM)	Comments on ecology, archaeology – generally in agreement with the provisions in the Draft OEMP re ecology and archaeology, though some points on the REAC tables are noted and suggestions made for amendments & Landscape – overall the methodology and contents of Chapter 7 of the ES appear to conform with DRMB LA107 (2019) requirements and provide and accurate assessment of LVI.

Date	Form of correspondence	Key topics discussed and key outcomes
27/01/2020	Email from JC (SCC) to AMc (AECOM)	Providing results of traffic modelling for the proposed highways maintenance boundaries. JC requested relevant plans and associated documents to be sent accordingly.
05/02/2020	Email from AL (AECOM) to JC (SCC)	Issuing a formal revised Notification of Development. AL requested email address for John Henderson or other appropriate address to send GIS Order limit files to.
06/02/2020	Email from JC (SCC) to AL (AECOM)	Providing email address for John Henderson and confirming GIS is the appropriate format for Order limits to be sent. JC asked whether AK would be attending the next meeting and who his line manager is.
12/02/2020	Email from AL (AECOM) to JC (SCC)	Requesting confirmation of SCC attendees at meeting on 24/02/20. AL confirmed that AK would attend and requested representation from SCC highways and legal teams to be present to discuss the legal agreement on the monitor and manage approach.
13/02/2020	Email from JC (SCC) to AL (AECOM)	Confirming SCC highways and legal representation will be present at meeting on 24/02/20. JC raised main points SCC wished to discuss, including highway adoption and future maintenance responsibilities; prospective provisions for SCC as a highway authority; and the impact at Churchbridge junctions.
14/02/2020	Email from RR (AECOM) to JC (SCC)	Providing Technical Note setting out proposed monitor and manage approach and proposed agenda for meeting on 24/02/2020
24/02/2020	Meeting with AK (HE); RR, AL, DE, AB (AECOM); JC, WS, SH, TE (SCC); and TW (Gowlings)	Meeting to discuss DCO submission and concerns regarding weight restriction technical note, the monitor and management approach, future maintenance responsibilities, Churchbridge junctions and the West and Shire permit scheme.
09/03/2020	Letter from HE to SCC	Letter and section 56 notice provided to SCC.
10/03/20	Email from AL (AECOM) to JC (SCC)	Attaching draft meeting minutes from meeting on 24/02/20. AL requested SCC review and comment on minutes and forward to Trish Evans. AL also requested SCC comments on the weight restriction technical note, HoT and an indicative cost estimate for weight restriction.
20/03/20	Email from JC (SCC) to AL (AECOM)	Providing review of Technical Note and HoT as part of actions from meeting on 24/02/20. Main concerns relating to residual HGV traffic on the A460, post scheme.
27/03/2020	Email from TP (AECOM) to CA (SCC) and PG (SSC)	Notified CA and PG that the Scheme had been accepted for Examination by the Planning Inspectorate. Responses to comments on draft FRA and WFDa and how these were addressed prior to submission of the draft DCO. These responses are provided in a draft SoCG (specifically with the LLFA). A four week period for review of the draft SoCG was requested. The LLFA SoCG has been incorporated into this wider SoCG.

Date	Form of correspondence	Key topics discussed and key outcomes
08/04/2020	Email from JC (SCC) to RR and AL	Requesting an update on the future maintenance responsibility at M54 Junction 1 and previous proposals for the HGV agreement, to inform LIR and Written Representations. JC also provided SCC's comments on the Transport Assessment and traffic model.
09/04/2020	Phone call JC and AL	AL notified JC that HE is extending the Relevant Representations (RR) period until 18/05/2020. AL asked whether SCC would mind HE putting up posters on closed deposit points doors stating that the deposit points were closed and providing the webpage address for accessing application documents (AL noted that the SCC reception desk had stated HE could not because they may attract people to the building). JC agreed to ask colleagues as a closure poster would not attract visitors. AL and JC agreed that it would be good to address SCC's comments on the TA before Examination. AL notified JC that HE had not received any communication on how the Examination might be affected from PINS but had agreed the extension to the RR period with them.
09/04/2020	Email from AL (AECOM) to JC (SCC)	Notifying JC that posters would be erected on posts rather than SCC property as consent had not been provided by SCC.
17/04/2020	Letter from HE to SCC	Letter notifying of extension to RR period due to Covid-19
27/04/2020	Email from TP to CA (SCC) and PG (EA)	Requested review and comment on draft LLFA SoCG submitted on 26/03/20. Notified CA and PG that HE are extending the relevant representations period until 18/05/2020. TP requested early site of relevant representations if possible.
27/04/2020	Email from JC (SCC) to TP (AECOM)	Advised that SCC have submitted a RR with a bullet list of themes SCC are interested in.
06/05/2020	Email from ND (SCC) to NP (AECOM)	Requesting a copy of the forecasting report, with particular interest in the Uncertainty Log.
06/05/2020	Email from AK (HE) to ND (SCC)	Requesting clarification on why SCC have asked for a copy of the forecasting report.
06/05/2020	Email from ND (SCC) to AK (HE)	Confirming that SCC are working alongside SSC with St Francis Group who are promoting the former ROF Featherstone Site for employment purposes and SSC required clarification on whether the ROF site should be included explicitly in the forecasting for the M54 M6 link road.
07/05/2020	Email from AK (HE) to ND (SCC)	Confirming the team would respond to the query regarding ROF Featherstone forecasting whilst AK was on annual leave.
12/05/2020	Email from BB (HE) to ND (SCC)	Clarifying the status of the ROF Featherstone site regarding its inclusion within the traffic forecasts and confirming the status of ROF Featherstone site in the Uncertainty Logs. BB confirmed that ROF Featherstone had not been included in the 'Core Scenario' set of traffic forecasts (for either the 'Do-Minimum' or 'Do-Something' cases); and provided justification for this conclusion.

Date	Form of correspondence	Key topics discussed and key outcomes
29/05/2020	Email from TP (AECOM) to SL and SK (SCC)	Providing responses to comments on the draft ES and Outline Environmental Management Plan and how these were addressed in the final submission. Request for a review of these responses and provision of additional comments if appropriate.
24/06/20	Email from TP (AECOM) to CA (SCC) and PG (EA)	Request review and comment on the draft LLFA SoCG sent on 27/03/20. HE are looking to reach an agreement as far as possible prior to the examination. Offered to set up a conference call to discuss any areas where an agreement has yet to be reached with the relevant specialists.
23/07/2020	Email from AL (AECOM) to JC (SCC)	Providing a Technical Note responding to SCC queries raised on TAR and traffic modelling (08/04/2020). AL provided responses for SCC queries raised between 20/03/2020 and 08/04/2020. Responses included queries on the following: maintenance boundaries; enforcement of diversion routes; protective provisions; and HGV traffic along the A460, how M6 Diesel is dealt with in the traffic model and potential threshold for HGVs and figure in HE's risk pot.
05/08/2020	Email from AL (AECOM) to JC (SCC)	Providing notification of design change and requesting input to confirm if the proposed approach to consultation on the scheme changes is deemed adequate.
13/08/2020	Email from TP to SL (SCC)	Requesting SCC's input regarding the acceptability of a potential design change to allow a landowner to retain an area of their land.
18/08/2020	Meeting with AK (HE); RR, AMc (AECOM); BS (Linkconnex); JC, WS (SCC); and TW (Gowling)	Meeting to provide an update on DCO process and notification of design changes in advance of the formal consultation on proposed changes starting on 24/08/2020.
19/08/2020	Email from AL (AECOM) to JC and WS (SCC)	Providing minutes for notification of design changes and DCO meeting held on 18/08/2020. Minutes for review. AL suggested dates for next meeting.
24/08/2020	Letter from HE to SCC	Letter notifying SCC of consultation on proposed DCO changes.
25/08/2020	Email from AL to JC and WS (SCC)	Confirming the proposed design changes animation is live on citizenspace.
26/08/2020	Email from JH (AECOM) to JC (SCC)	To request a direct contact for Four Ashes Ltd and Kilbride Limited.
26/08/2020	Email from JC (SCC) to JH (AECOM)	Providing requested contact details for Four Ashes Ltd and Kilbride Limited.
09/09/2020	Meeting with AK, GK (HE); RR, AL (AECOM); SBe (Linkconnex); JC, WS, ND (SCC); KH, SP	Meeting to provide update on ROF Featherstone, DCO progress and proposed scheme changes.

Date	Form of correspondence	Key topics discussed and key outcomes
	(SSC); AP (SFG); and SE (i-transport)	
15/09/2020	Email from AL (AECOM) to JC, WS and ND (SCC)	Providing minutes and actions from meeting on 09/09/2020 for review.
15/09/2020	Email from JC (SCC) to AL (AECOM)	Forwarding queries raised by the cabinet member for Highways, and request for the layby on the A460 at Shareshill be removed as part of the scheme. JC asked for the query be discussed in upcoming meeting (17/09/2020).
15/09/2020	Email from AL (AECOM) to JC (SCC)	Providing an initial response to the queries raised by the cabinet member for highways, forwarded by JC on 15/09/2020. AL confirmed the request for the removal of the layby on the A460 at Shareshill would not be incorporated within the Scheme and provided justification. AL happy to still discuss in meeting.
16/09/2020	Email from AL (AECOM) to JC (SCC)	Summarising the response to previous SCC query regarding how the DCO secures the reclassification of the existing A460 and the colour coding on the classification of road plans; ahead of meeting on 17/09/2020.
17/09/2020	Meeting with AK (HE); SB (Linkconnex); RR, DE, AMcN SH (AECOM); JC, WS, ND (SCC); KH, SP (SSC); TW (Gowling)	Meeting to discuss outstanding matters regarding changes to the DCO and protective provisions.
18/09/2020	Email from JC to AK	Response to consultation on DCO changes.
25/10/2020	Email from AL to JC	Draft SoCG provided for comment
03/11/2020	Email from JC to AL	Comment provided on draft SOCG

2.1.2 It is agreed that this is an accurate record of the key meetings and consultation undertaken between (1) Highways England and (2) SCC in relation to the issues addressed in this SoCG.

3. Issues

3.1 Introduction and General Matters

- 3.1.1 This chapter sets out the 'issues' which are agreed, not agreed, or are under discussion between SCC and Highways England.
- 3.1.2 The letter provided to Highways England by the Planning Inspectorate on the 20 August 2020 under Section 88 of the Planning Act 2008 (as amended) and the Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 6 (hereafter referred to as the 'Rule 6 Letter'), sets out the issues that the Planning Inspectorate want Highways England and the relevant parties to address in their SoCG. Specifically, Annex F sets out the parties that the Planning Inspectorate wants Highways England to produce a SoCG with and the issues that they want to see addressed, namely:
1. The effect of minerals and waste.
 2. Transport and traffic effects including the appropriateness of the traffic modelling and inputs.
 3. The effect on Non-motorised Users.
 4. Water environment effects, including any permits required from SSC as LLFA.
 5. Socio-economic effects.
 6. The draft DCO provisions and requirements including future procedures for approval of details.
- 3.1.3 Table 3.1 has been organised to address each of these issues in turn, with a preceding section on the principle of the Scheme and a final section on 'other' issues related to agreement on topics presented in the ES.

3.2 Issues

3.2.1 The table below shows those matters which have been agreed or yet to be agreed by the parties. The document reference column is included where the matter pertains to a specific section of a document submitted as part of the Application or following submission.

Table 3.1: Issues

Document	Subject	Staffordshire County Council Comments	Highways England Response	Status	Agreement likely (App) ¹	Agreement Likely (IP) ²
General considerations						
N/A	Need for the Scheme	The parties agree that there is a need for the Scheme to provide a good strategic link between the M54 and the M6, reducing congestion in the surrounding area. SCC is supportive of the Scheme in principle and notes the positive impact the Scheme would have on the County. SCC is supportive of the Development Consent Order being made.		Agreed	Agreed	
Case for the Scheme [AS-037/7.2]	Policies for consideration	It is agreed that the submitted Case for the Scheme and the National Policy Statement for National Networks (NPSNN) accordance table [AS-037/7.2] provides a comprehensive assessment of the policies that are relevant and important for decision making on the Application.		Under discussion	Agreed	Agreed

¹ Indication on likelihood that the matter will be agreed by the close of the Examination period as rate by the applicant (app) and the Interested Party (IP). Dark green = agreed, light green = high likelihood of agreement, orange = medium likelihood of agreement, red = low likelihood of agreement.

² Interested Party. In this case Staffordshire County Council

	Compliance with the NPSNN	The parties are satisfied that the proposals are compliant with the NPSNN as set out within Appendix A of the CftS [APP-220/7.2].	Agreed	Agreed	
	Compliance with Local Planning Policy	<p>The parties agree that the local plan policies identified within Section 8.3 of the Case for the Scheme [AS-037/7.2] are comprehensive and comprise those relevant and important for decision making.</p> <p>SCC agrees with the local planning policy assessment provided within Appendix B of the CftS [AS-037/7.2]. It is agreed that the Scheme is compliant with local planning policies and will support the delivery of the Local Plan through providing better highway links and relieving congestion to support delivery of nearby allocated sites.</p>	Under discussion	High	High
	Allocations and designations	<p>. It is agreed that, to the best of SCC's knowledge, the Scheme would not adversely affect any allocations in the Local Plan. It is likely that the link road will facilitate delivery of employment sites in the area (see traffic and transport section below).</p> <p>The parties agree that the Scheme is located within the South Staffordshire Green Belt. Whilst the Scheme will impact on the openness and permanence of the Green Belt it is agreed that impacts have been limited wherever possible as part of Scheme design. Whilst there will be harm to the Green Belt, it is agreed that 'Very Special Circumstances' (VSC) exist and are appropriately justified within Section 8.6 of the CftS. It is agreed that the VSC outweigh the harm to the Green Belt and any other harm.</p>	Under discussion	High	High

Environmental Statement	Alternatives	<p>. It is agreed that Highways England has adequately considered and assessed suitable reasonable alternatives in accordance with the EIA Directive 2014/52/EU and the requirements of the DMRB.</p> <p>The selection of the final route is understood and has been clearly communicated to SCC.</p> <p>SCC agrees that the Council does not have any legal compliance concerns in respect of route selection.</p>	Agreed	Agreed	Agreed
	ES Conclusions	<p>SCC to confirm. There are no objections to the findings of the ES, including the proposed study areas (in relation to all technical disciplines); the limits of deviation (i.e. the Rochdale Envelope parameters); the assigned sensitivity of receptors; the assigned magnitude of impacts; the significance of residual effects (in relation to all technical disciplines) the proposed mitigation measures; and the application of expert judgements and assumptions.</p>	Under discussion	High	
Permits, Consents and Licences	Permits, Consents and Licences	<p>SCC to confirm. SCC does not see any impediment to the grant of any permits, consents or licences that may be required outside the DCO as listed in the Consents and Agreements Position Statement (CAPS) [APP-020/3.3]. To the best of SCC's knowledge no consents are required beyond the DCO and the consents listed in the CAPS.</p> <p>SCC does not object to the inclusion of any powers within the DCO that are proposed to be included.</p>	Under discussion	High	

		SCC has minor comments on the draft DCO but these are not expected to be an impediment to the grant of consent.			
N/A	Articles and Requirements	The Applicant has not received any comments on the Articles or Requirements on the draft DCO from SCC.	Under discussion	Medium	
1/ The effect on minerals and waste					
Chapter 10: Material Assets and Waste	Appendix 10.1: Mineral Safeguarding Report	SCC noted the absence of an assessment to address the requirements of Policy 3 of the Minerals Local Plan for Staffordshire i.e. the existence, quantity, quality and value of the underlying or adjacent mineral resource.	An assessment of the effects on the Minerals Safeguarding Area was appended to the ES. This addresses SCC's comment.	Agreed	Agreed
		The mineral safeguarding assessment identifies that between 04Mt to 1.0Mt of sand and gravel is affected by the proposal (#4.3.5) but the applicant should also indicate the amount of resource that could be recovered from		Under discussion	High

		proposed earthworks and could be used within the proposed construction scheme (as fill or concrete making material).				
		<p>SCC require consideration to be given to the impact of the Scheme on the nearby permitted Hilton Park quarry.</p> <p>The mineral safeguarding assessment considers the impact on the permitted Hilton Park Quarry and refers to mitigation in terms of providing an alternative access to the public highway.</p> <p>Figure 1 to the mineral safeguarding assessment indicates that the proposal would affect potential resource to the west of the permitted quarry. Clarification should be provided as to whether the existing underpass connecting the two</p>	An assessment of the effects on the Minerals Safeguarding Area is appended to the ES.	Under discussion	High	High

		parts of the permitted quarry would be affected.				
	Baseline conditions	SCC states that an assessment on the impact of mineral production and landfill capacities should include those facilities reasonably capable of supplying the Scheme taking into account economic haulage distances and timescales for the availability of mineral / landfill sites.	An assessment of material assets and waste is reported in Chapter 10. Material Assets and Waste, of the ES. This has been undertaken in accordance with the recently published Design Manual for Roads and Bridges, Volume 11. Environmental Assessment, Section 3 Part 13 Material Assets and Waste (LA 110). Appended to the ES (Appendix 10.1) is an assessment of impacts on mineral safeguarding. The reduction or alteration in the regional capacity of landfill as a result of accommodating waste from the Scheme is included in the assessment.	Agreed	Agreed	Agreed
	Potential Impacts	The ES should estimate the quantity of aggregate material required for the Scheme and identify	This matter was considered within the submitted Chapter 10. Material Assets and Waste of the ES [APP-	Under discussion	Medium	

		<p>the potential sources for such materials (on and off-site), noting that paragraph 2.3.9 of the PEIR Summary indicates an initial deficit of 90,000m³ of fill material.</p>	<p>049/6.1]. Section 10, paragraph 10.7.9 confirms that “<i>such materials required for the Scheme could be sourced locally in order to minimise travel distances.</i>”</p> <p>Highways England notes that the proposed Scheme changes submitted in October 2020, as set out within the ES Addendum: Proposed Scheme Changes October 2020 [AS-118/8.7], do not change the previous conclusions of the original Chapter 10 assessment.</p> <p>The final cut fill balance will be revisited continually through the detailed design process and construction to achieve as close to a balance as possible but no further information is proposed to be submitted for the purpose of determining the Application.</p>		
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Chapter 9 Geology and Soils	Essential Mitigation	SCC asks whether a materials management plan be produced to identify where excavated waste can be deposited within the scheme to avoid off-site disposal?	HE confirms that a Materials Management Plan will be produced as part of the Construction Environmental Management Plan to discharge Requirement 4 on the draft DCO [TR010054/APP/3.1].	Agreed	Agreed	Agreed
		Fill requirements are one aspect of the material requirements of the scheme and #10.7.8 of the ES states: predicted cut and fill for the Scheme is likely to be imbalanced and disposal of material will be required. Table 10.8 indicates the requirements for roadstone and concrete. It is recommended that the materials management plan (recommendation 4 of the draft DCO) includes reviews of these material requirements and how these can be		Under discussion	High	High

		sustainably sourced in terms of using recycled/ secondary sources as well as materials locally sourced.				
2/ Transport and traffic effects including the appropriateness of the traffic modelling and inputs						
Discussion on this topic throughout 2019-2020 in consultation responses, e-mails and meetings.	Traffic model	SCC and HE agree that the traffic model used to inform the DCO application is robust and the methodologies used are correct.		Agreed	Agreed	Agreed
	Traffic along the existing A460 post construction, a weight restriction and M6 Diesel	The parties agree that the Scheme will deliver a significant reduction in traffic along the existing A460, including a significant reduction in HGV use. This would deliver benefits for the surrounding properties.		Agreed	Agreed	Agreed
		SCC requested clarity on how M6 Diesel was considered in the traffic model (phone call between JC and AL on 9 April 2020).	M6 Diesel has not been modelled as a specific local model zone for two reasons: 1/ It is standard traffic modelling practice to assume that all trips to fuel filling station businesses are 'passing trips' because it would be unusual for a fuel filling station to have a large enough business draw to 'generate' its own trips over the long-term period.	Agreed	Agreed	Agreed

			<p>2/ The number of vehicles using the filling station was surveyed by SCC as 680 vehicles over a 24-hour period, which, when converted to the one-hour modelled periods, is equivalent to 28 vehicles per hour. This is far too low to be considered as a zone in its own right in the Scheme's Base Year traffic model. The DfT's latest (May 2020) transport appraisal guidance (TAG) suggests that smallest zones in the Detailed Model Area should represent about 200 to 300 vehicles per hour. This means that the M6 Diesel site might have been allocated its own zone if it had been 10 times bigger; notwithstanding that customers are likely to be passing trips and therefore excluded by consideration 1 above. (HE response by email on 23 July 2020).</p>			
		HE and SCC agree that M6 Diesel should not have been modelled as a specific zone due to its	Agreed	Agreed	Agreed	

		size being far below that specified in the guidance as being appropriate for this purpose. HE and SCC agree that no additional traffic modelling is required to/ would be likely to resolve the discussion on HGV use of the A460.			
		SCC is of the view that HGV movements along the A460 post construction could exceed that forecast in the traffic model because vehicles may continue to use the fuel station M6 Diesel, resulting in greater number of vehicles using the A460 along its entire length than predicted in the model.	HE recognises that traffic modelling does have uncertainties associated with it but disagrees that M6 Diesel is likely to be a big enough attractor to divert significant numbers of vehicles from the new link road when constructed. HE notes and appreciates SCC's comments regarding the traffic model above.	Under discussion	Low
Email from JC on 20 March 2020. HE response provided in email from AL on 23 July 2020		Could HE advise on the proposals for enforcing the signed diversion route (A5/A449) if the new link is closed, with a particular emphasis on HGV traffic? SCC is concerned that traffic may use the A460 when there is an incident on the link road.	All incidents on the trunk road and motorway network result in a certain amount of disruption, with drivers seeking to find alternative available routes, including local highways. In such events, tactical diversion routes (using symbols on the corners of ADS signs) can be implemented at the	Under discussion	Low

			discretion of the Police but alternative routes cannot be enforced unless there are existing Traffic Regulations in place on them. In the event of an incident on the new M54 to M6 link road, resulting in a closure, it is proposed that the existing strategic message equipment on the M54 and M6 would be used to encourage traffic to use the A449/A5 route.			
<p>Discussion on this topic throughout 2019-2020 in consultation responses, e-mails and meetings.</p> <p>Meeting 17/09/2020 (agreed the 'not agreed' position) as presented.</p>		<p>The DCO application should include a weight restriction on the existing A460. This would safeguard against future use of the A460 by HGVs and ensure measures can be implemented to improve the village feel of the road.</p> <p>The weight restriction should potentially extend from south of M6 Diesel south to Dark Lane.</p> <p>SCC's concern is not about whether the</p>	<p>HE's position is that the DCO application should not include this provision because:</p> <p>1/ The Scheme will achieve its aim because it will result in a significant reduction in the number of HGVs using the A460.</p> <p>The Scheme results in a significant reduction in the number of HGVs using the A460. Without the Scheme in place there is forecast to be 3,114 HGVs per 12-hour day on the A460 stretch</p>	Not agreed	Not agreed	Not agreed

		<p>amount of HGV traffic on the A460 post construction would be acceptable. SCC's position is that an aim of the Scheme is to reduce HGV traffic along the existing A460 and a weight restriction would increase the effectiveness of the Scheme in achieving that aim.</p> <p>SCC stated (17/09/20) that the parties should agree to disagree on this point.</p>	<p>through Hilton in 2024. The traffic model forecasts that this would reduce to 279 HGVs over a 12-hour day in 2024 with the Scheme in operation. Given this very significant (90%) reduction in HGV use resulting from the construction of the link road, HE does not agree that it is necessary for the DCO application to also incorporate a weight restriction along the A460.</p> <p>2/ When considering the traffic using M6 Diesel and a 'worst case scenario' in terms of future HGV use of the A460, traffic is still very significantly lower than at present.</p> <p>HE notes that SCC has agreed that the traffic model is robust and does not challenge its conclusions. Nor has SCC provided any evidence to back up their assertion that HGVs will continue to use the existing A460 to a</p>			
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			<p>greater degree than predicted.</p> <p>At SCC's request, HE reviewed data on HGV use of the fuel station, M6 Diesel. This data showed that the two-way HGV flow between the M6 Diesel depot and the A460 south is 373 HGVs per day (24 hour period). Even in the highly unlikely event that none of this traffic is accounted for within the 279 HGVs forecast to use the A460 in 2024, <i>and</i> that the traffic using the M6 Diesel remains as it is currently with the link road in place, this would still only result in a total of 652 HGVs using the stretch of the A460 south of M6 Diesel. Even in that scenario, the Scheme would lead to a 79% reduction in HGVs along the current A460.</p> <p>3/ No evidence or rationale has been provided on why the residual HGV use of the A460 would be unacceptable.</p>			
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			<p>This evidence has not been provided for the level of HGV traffic predicted in the traffic model, or any specific increase in this amount.</p> <p>4/ No evidence has been provided to conclude that the weight restriction as proposed (or any alternative) would be effective or that it would not cause unintended adverse effects.</p> <p>There are a number of weight restrictions already in the area and care would need to be taken over the implementation of any weight restriction to ensure a restriction did not have undesirable effects by routing HGVs onto more minor surrounding roads.</p> <p>5/ The A460 is a road operated by SCC.</p> <p>The length of the A460 between the M54 and the M6 is maintained by SCC as the Local Highway Authority (LHA). Once the strategic trips have</p>			
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			<p>been removed from this length of the A460 through Featherstone and Shareshill, the LHA will have more potential options for the control of HGV movements. However, this seems like a measure that could be planned and implemented by the LHA at some future date if deemed necessary and appropriate.</p>			
Discussions November 2019- September 2020	Proposal to monitor and if necessary manage the use of the A460 by HGVS post opening of the Scheme	<p>At a meeting on 17/09/20 SCC reported that SCC does not think the monitor and manage approach delivers sufficient benefits to warrant proceeding to agree terms for a legal agreement. There were also concerns that the proposed arrangement was to sit outside of the DCO.</p>	<p>In November 2019 HE offered a compromise to resolve the disagreement over the need for a weight restriction on the A460. HE proposed that a legal agreement could be signed by the two parties, whereby HE would agree to monitor HGV use of the existing A460 post construction of the Scheme and work with SCC to take action if the HGV traffic unacceptably exceeds that predicted in the traffic model. Discussions have been held since that time on how this might operate,</p>	Agreed not to proceed	Agreed	Agreed

			<p>potential thresholds for this agreement and funds available to implement solutions.</p> <p>However, SCC reported on 17/09/20 that it no longer wishes to proceed with this approach. HE agreed not to proceed with this approach.</p>			
Correspondence Sept 2020	Lay-by A460	<p>SCC asked whether the layby on the A460 at Shareshill removed when the M54 to M6 Link Road goes ahead.</p>	<p>HE is not intending to incorporate the removal of the Sharehill layby into the Scheme. The removal of a layby used by HGVs could shift the problem to elsewhere on the network and could exacerbate the problem in the area rather than resolve it.</p> <p>The existing A460 is operated by SCC and is not a HE road. HGV parking along local authority maintained roads is not an issue that HE would aim to address unless it was to mitigate an impact of the Scheme. In this case, the M54 to M6 link road will significantly reduce HGV traffic along the</p>	Under discussion	Medium	Medium

			<p>A460 and does not reduce HGV parking elsewhere so would not appear to have an impact on the use of the layby. Indeed, it is possible that the reduced HGV use of the A460 will reduce use of the layby. Further, HE's understanding is that there is a Traffic Regulation Order on the layby providing a midnight to 6am ban on parking and a 1 hour max parking. If vehicles are parking for longer than these periods, this is likely to be an enforcement issue not a development issue.</p>			
Classification of Roads Plans [TR010054/APP/2.9]	Classification of the A460 post construction	<p>SCC requested that the DCO re-classifies the existing A460 so that is no longer an A or B road.</p>	<p>HE agreed to this request and has incorporated the re-classification of the A460 in the plans for the Scheme to make the existing A460 an an-numbered C road.</p>	Under discussion	High	

Traffic Assessment Report (TAR) [TR010054/APP/7.4]	Churchbridge improvement works	No mention is made in paragraph 4.3.4. of the TAR improvement works at Churchbridge, SCC queried whether these should have been included.	At the meeting with SCC on 24/02/2020, SCC recognised that improvements at Churchbridge Junction could not be included in the M54 to M6 link road scheme.	Agreed	Agreed	Agreed
Meeting 09/09/2020	ROF Featherstone/i54	<p>SCC understands that HE did not include ROF Featherstone in the traffic model and understands that this is because ROF Featherstone was considered by SSC (email from Ed Fox in March 2019) to be dependent development.</p> <p>SCC is in discussion with St Francis Group (the developer) about a forthcoming planning application and the extent to which the ROF Featherstone employment site can be operational before the construction of the M54 to M6 link</p>	<p>HE agrees that the link road could support delivery of the allocated Strategic Employment Site at ROF Featherstone by alleviating traffic along local routes such as the A460.</p> <p>HE agrees that ROF Featherstone is at least partially dependent on the link road and therefore considering the site as dependent development was the correct approach in the traffic model.</p> <p>HE modelled the i54 site as part of the traffic model.</p> <p>The issues discussed on 9 September 2020 will continue to be discussed going forward as there</p>	Under discussion	High	High

		<p>road. In the absence of the link road, it is SCC's view that the development of ROF Featherstone would increase traffic on the surrounding road network and this traffic would be problematic to manage in the absence of the M54 to M6 link road. Therefore, ROF Featherstone is at least partially dependent development and the development of the link road will support the delivery and operation of the allocated site.</p> <p>SCC notes that the traffic model for the Scheme may have slightly underestimated traffic from i54 but that this is not considered to be problematic in the context of a strategic traffic model.</p> <p>Concern raised by SCC and SSDC</p>	<p>may some clarifications needed. HE cannot commit at this stage to which projects can be included in future iterations of the Road Investment Strategy.</p> <p>HE's understanding of the impact of the ROF Featherstone development is currently based on statements from St Francis Group rather than being HE's independent assessment of the position.</p>			
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		concerning the potential for traffic from this development to be viewed as adversely impacting upon on the M54 J2 slip road capacity, because of the way it has been included in the model. The commentary should include the helpful assurance given by HE on 9th September 2020 that capacity issues would be unlikely to occur in the development Year of Opening, and if they occurred later they would be addressed by HE through their Road Investment Programme.				
Discussions 2019	Connection to the M6 Toll	SCC requested clarity on whether future connection to the M6 Toll is possible if finance becomes available.	A future connection to M6 Toll has been considered as part of the Scheme development as set out within the Consultation Report [AS-020].	Agreed	Agreed	Agreed

			Although not part of this Scheme, as such a link falls outside of the scope, any connection to the M6 Toll would require stopping up the link road just short of M6 Junction 11 and bypassing the junction with new structures over the M6 and M6 Toll to connect to Junction T8 with free flow slip roads to both the M6 and M6 Toll. This Scheme does not preclude the possibility of a future link to the M6 Toll being built in the future.			
Highways design (General Arrangement Drawings [TR010054/APP/2.5])	Design principles of the affected local highway network	The parties agree with the proposed reduction in speed limit along Hilton Lane, the proposal to retain the connection to Mill Lane and details regarding the A460 – Link to Featherstone tie-in.		Agreed	Agreed	Agreed
	Avenue/Cannock Road Junction	SCC agreed that a mini roundabout for the vehicle numbers involved seems an over-engineered solution and a simpler option may suffice. JC recommended that the two proposals are presented to SCC highways design	Under discussion	Under discussion	High	

		<p>team for consideration.</p> <p>SCC also have concerns with the length of Cannock Road(A460) south of the junction becoming subject to indiscriminate parking due to proximity to M54 Jct 1 and suggest measures be implemented to prevent such activity.</p>				
	Dark Lane Junction details	<p>SCC confirmed that the details are acceptable and the final layout sketches are to be submitted to Simon Hawe for consideration, with a note to be added to the drawing stating that bridleway street furniture is to be developed and agreed during detailed design.</p>	Noted and agreed.	Under discussion	High	
	Details of Tie into existing A460	<p>SCC outlined a number of questions in relation to the land between the proposed carriageway and</p>	Under investigation.	Under discussion	High	

		adjacent properties that need to be considered. Will the ad medium filum rule need to come into effect and the land acquired handed back to the adjacent landowner or will SCC be responsible for sections of the driveways?				
Outline Traffic Management Plan [TR010054/APP/7.5]	Traffic Management	The parties agree that the detail of traffic management proposals will be developed to discharge requirement 10 on the draft DCO [TR010054/APP/3.1] and do not need to be developed in advance of decision making on the DCO Application.		Agreed	Agreed	Agreed
Outline Traffic Management Plan [TR010054/APP/7.5]	Traffic Management	Management of temporary and permanent traffic impacts during construction and operation resulting from the Scheme need to be developed further in consultation with SCC (and other parties). This is particularly the case for traffic management around the closure of the M54 Junction 1	Discussed and Agreed. Liaison will continue with key stakeholders, including SCC, regarding the construction programme and necessary closures and diversions throughout the construction period. HE updated the Outline Traffic Management Plan to provide more comfort that this engagement will take place and reflect the changes to traffic management that would	Under discussion	High	

		should the Scheme changes submitted on 9 October be taken forward.	occur if the Scheme changes are accepted by the ExA.			
N/A	Signage on the local highway network	SCC has confirmed that they are content to amend signs on their own network using their existing powers, where this is necessary following construction of the Scheme. SCC has suggested this should be subject to funding from HE. HE will consider this position.	Under discussion	High	High	
Maintenance Boundary Drawing: HE514465-ACM-HGN-M54_SW_PR_Z-DR-CH-1009 (Rev P03) Not submitted with the DCO application	Maintenance Boundaries	Discussions have been ongoing with SCC on proposed future maintenance boundaries after construction. Initial plans showing proposed boundaries were shared with SCC at a meeting in November 2019 and by e-mail from AM on 18 December 2020 (drawing HE514465-ACM-HGN-M54_SW_PR_Z-DR-CH-1009). The areas of the Scheme proposed to be maintained by SCC are the A460 south and North of M54 Junction 1, Hilton Lane, Cannock Road, A460 North and A462 at M6 Junction 11. All other areas of the Scheme are proposed to be maintained by Highways England save for potentially some attenuation requirements south of M6 Junction 11 (see below). Previously the links between the Featherstone Junction West Roundabout, Featherstone Junction East Roundabout and M54 Junction 1 South Roundabout were proposed to be maintained by SCC. SCC requested a change to maintenance boundaries at M54 J1 so that HE would maintain the internal connecting roads and three roundabouts rather than SCC. HE agreed to this change.	Under discussion	High	High	

		Following amendments made at SSC's request the parties have agreed future maintenance responsibilities as set out in the specified plan with the exception of the pond discussed below. Revision P03 of the Maintenance Boundary drawing shows the agreed position.			
	Pond near J11	The attenuation pond near Junction 11 would operate to drain sections of both the local and strategic highway networks. Discussions are ongoing on how to manage the maintenance and ownership of this pond and its detailed design.	Under discussion	High	
3/ The effect on non-motorised users					
Streets, Rights of Way and Access Plans [TR010054/APP/2.7]	Proposed Public Right of Way Diversions	The parties agree that the Streets, Rights of Way and Access Plans reflect the Definitive Map and Statement. SCC will update the Definitive Map and Statement to reflect changes should the DCO be made.	Agreed	Agreed	Agreed
Streets, Rights of Way and Access Plans [TR010054/APP/2.7] & ES Chapter 12: Population and Health [TR010054/APP/6.1]	Proposed Public Right of Way Diversions	Public Bridleway No.1 Shareshill – The route is a cul-de-sac meaning that for equestrians and cyclists it does not connect to another bridleway, although walkers can connect to a number of other footpaths. If Public Footpath No.17 Shareshill were upgraded to public bridleway then horse	Public Footpath No 17 Shareshill is outside the Order limits. Any upgrades therefore are currently beyond the scope of the Scheme. The ES Chapter 12 does not deem that there is a significant effect on access for non-motorised users as a result of the Scheme such that works are required to Public Footpath No. 17 to	Agreed	Agreed

		riders and equestrians would be able to do so too. There is no mention of doing so within this Scheme, but this represents a possible improvement opportunity for consideration.	mitigate the effects of the Scheme.			
Streets, Rights of Way and Access Plans [TR010054/APP/2.7]	Proposed Public Right of Way Diversions	Proposed Paths Sheet 6 of 10 indicates that the proposed diversion of Bridleway No.1 will cross Public Footpath No.3 Shareshill before connecting with the original line of Public Bridleway No.1 Shareshill. It would make sense to upgrade the short section of Footpath No.3 to a bridleway then divert Public Bridleway No.1 along this to maintain a close link with Footpath No.4 Shareshill which heads north and the original alignment of Bridleway No.1.	The diverted route of Bridleway No.1 has been revised to keep to the shortest possible route back to the original alignment that will be the desire line of users. This now connects back to Shareshill No. 1 at the end of Shareshill No.3 therefore there is no requirement to upgrade Shareshill No.3 as part of the Scheme.	Agreed	Agreed	Agreed

Streets, Rights of Way and Access Plans [TR010054/APP/2.7]	Proposed Public Right of Way Diversions	Clarification required as to whether using Footpath No.5 Shareshill and the realigned Hilton Lane bridge is an alternative. It is considerably further south and only available to pedestrians, not equestrians or cyclists.	Footpath Shareshill 5 which would be severed by the scheme has been proposed to be re-routed over Hilton Lane bridge before connecting back into the old alignment, this right of way is currently only suitable for foot traffic therefore the alternative is considered acceptable.	Agreed	Agreed	Agreed
		The information provided re the effect of changes at J11 on Public Footpath No.4 Shareshill is not accurate enough to enable comments to be submitted at this time.	Shareshill No.4 will be locally diverted by a few metres to allow the construction of M6 J11. The level of connectivity will be as per the current scenario.	Agreed	Agreed	Agreed
		Public Footpath No.5 Shareshill will be severed by the proposed new road and its western section extinguished. There are no significant concerns about the diversion of the path along a farm track to meet Hilton Lane. This diversion	As a result of the October 2020 scheme changes Public Footpath No. 5 Shareshill is to be diverted over a shorter length than previously with the western section remaining. It will still be re-routed over Hilton Lane bridge before connecting back into the old alignment.	Under discussion	High	

		and access north-west towards Shareshill will be maintained through the new footway. We also welcome the proposed new shared footway/cycleway that provides a link to Dark Lane.	Agreement is sought from SCC for the revised route.			
Streets, Rights of Way and Access Plans [TR010054/APP/2.7]	Proposed Public Right of Way Diversions	A short section of Public Footpath No.8 Saredon will require to be diverted to link to the amended road layout at J11. While in principle there are no particular concerns about this amendment, further details are required about the layout of the new J11 island and whether this route will meet a footway.	Further details regarding the pedestrian layout of M6 J11 have been indicated on the NMU drawings. It is proposed that all crossing points for pedestrians will be under signal control therefore the connectivity through the junction is anticipated to be significantly improved.	Agreed	Agreed	Agreed
		The proposals to amend the J11 island will mean Public Footpath No. 1R/2214 Saredon linking the J11 M6 island and Public Footpath No.8	This is noted.	Agreed	Agreed	Agreed

		Saredon will need to be extinguished. The link between Footpath No.8 Saredon and the J11 island will be maintained by the slight diversion of Footpath No.8 meaning the loss of this route will have minimal impact.				
		Public Bridleway No.13 Saredon – provides an important off-road access between Saredon Road and the A460. Clarity is needed on what impact the realignment of the northbound A460 will have on this route. At present the bridleway is used predominantly by equestrians as an out and back route from Saredon Road because of the poor access at its southern end onto the A460. If there is an opportunity to improve this access and ensure this route can be used between	Further details regarding the layout of M6 J11 have been indicated on the NMU drawings. It is proposed that Saredon No.13 will be diverted locally to connect into M6 Junction 11 with a layout that meets current standards (ie. removal of steps on Bridleway). There would be the opportunity for pedestrians and cyclists to cross the A460 via the M6 J11 island, however it is not proposed to provide an extension of the bridleway across M6 J11. Further details at detailed design stage. The connectivity through the junction is therefore	Under discussion	High	

		both roads that would be a real improvement.	anticipated to be significantly improved.			
Streets, Rights of Way and Access Plans [TR010054/APP/2.7]	Proposed Public Right of Way Diversions	Public Bridleway No.3 Featherstone provides a link between the old A460 Cannock Road and Public Bridleway No 8 Featherstone. The proposals to amend the M54 J1 island will mean this route will need to be slightly diverted and, according to plan 3, extended to link with Cannock Road. The alterations appear to be relatively minor meaning the diversion of this route will have minimal impact.	This is noted.	Agreed	Agreed	Agreed
		Public Footpath No 3 Shareshill runs very close to the Scheme. Clarification required on whether it will be affected by the proposed diversion of Public Bridleway No.1 Shareshill or otherwise.	It is anticipated that Shareshill No.3 will not be affected by the scheme. Please see the comments in relation to No.1 Shareshill.	Agreed	Agreed	Agreed

		Public Bridleway No.8 Featherstone runs very close to the scheme although the General Arrangement Scheme plan suggests it is not directly affected, given it joins into Featherston No.3, it should be considered.	Noted though it is anticipated that Shareshill No.8 will not be affected by the scheme.	Agreed	Agreed	Agreed
Streets, Rights of Way and Access Plans [TR010054/APP/2.7]	Public Right of Way application (LM645G)	An application to add footpaths to the Definitive Map under section 53 of the Wildlife and Countryside Act 1981, in the vicinity of J1 of the M54, should be considered as part of the ES.	Public Right of Way application LM645G submitted in November 2002 is for the deletion of a footway between South Crescent and Brookhouse Close in Featherstone and was accepted by SCC. This footway no longer appears on the definitive map and has therefore not been considered as part of the ES.	Agreed	Agreed	Agreed
Streets, Rights of Way and Access Plans [TR010054/APP/2.7]	SCC Public Right of Way Requirements	All temporary and permanent alternative footpath/bridleway routes should be open prior to the closure of the legal lines.	HE will endeavour to ensure all temporary and permanent alternative routes are open prior to any closures. This forms part of the assumption within the assessment and will be confirmed through discussions	Under discussion	High	High

			between the Construction Contractor and SCC.			
	SCC Public Right of Way Requirements	Non-motorised users should not be diverted on to the vehicular highway network, without appropriate mitigation, during construction. This is not a suitable alternative and presents safety concerns for pedestrians, horse riders and cyclists.	Where there is a need to divert a non-motorised user onto a vehicular highway during construction, appropriate mitigation would be provided. We are working to minimise the disruption and diversion requirements.	Agreed	Agreed	Agreed
	SCC Public Right of Way Requirements	All new path furniture must conform to the British Standard for Gaps, Gates and Stiles (currently BS5709:2018); British Horse Society (BHS) advice and the least restrictive principle (Equality Act 2010).	All footways/ footpaths and Bridleways will be designed to the current Standards and in consultation with SCC. Further details will be provided in the Detailed Design Stage.	Agreed	Agreed	Agreed
Streets, Rights of Way and Access Plans [TR010054/APP/2.7]	SCC Public Right of Way Requirements	Public Footpaths should be a minimum of 3 metres wide and Public Bridleways should be a minimum of 4 metres wide.	Noted, all footways/ footpaths and Bridleways will be designed to the current Standards and in consultation with SCC. Further details will be	Agreed	Agreed	Agreed

			provided in the Detailed Design Stage.			
		Standards for overbridges carrying bridleways and rural lanes should be in accordance with the DMRB and BHS standards.	All footways/ footpaths and Bridleways will be designed to the current Standards and in consultation with SCC. Further details will be provided at detailed design stage.	Agreed	Agreed	Agreed
		Footways should be provided on bridges, underpasses and highway verges where they are shared with vehicles. A verge for equestrians or a shared use footway/cycleway will be required in certain locations.	Noted, all footways/ footpaths and Bridleways are designed to the current Standards and in consultation with SCC. Further details will be provided in the Detailed Design Stage.	Agreed	Agreed	Agreed
		Case by case specification for path surfaces to be agreed with SCC and expectation that some non-sealed paths will be built with compacted stone + MOT specification. This applies during the construction phase and on	All footways/ footpaths and Bridleways will be designed to the current Standards and in consultation with SCC. Further details will be provided at detailed design stage.	Agreed	Agreed	Agreed

		completion of the scheme.				
Streets, Rights of Way and Access Plans [TR010054/APP/2.7]	SCC Public Right of Way Requirements	Schedule for path signage to be agreed with SCC with requirement for location, design and destination signage where appropriate.	All footways/ footpaths and Bridleways will be designed to the current Standards and in consultation with SCC. Further details will be provided at detailed design stage.	Agreed	Agreed	Agreed
		Any new fencing erected alongside the PRoW network must avoid using barbed wire, razor wire or electric fencing and must not create a tunnelling effect for path users. Highways England and affected landowners should note that SCC is not responsible for maintaining fencing either during or post-construction.	All footways/ footpaths and Bridleways will be designed to the current Standards and in consultation with SCC. Further details will be provided at detailed design stage.	Agreed	Agreed	Agreed
		Each diversion or new crossing of the road must be designed according to Equality Act standards and consideration must be given to ramps to	All footways/ footpaths and Bridleways are designed to the current Standards and in consultation with SCC. Where required, ramps have been included in the design including;	Agreed	Agreed	Agreed

		improve accessibility where appropriate.	Shareshill 1, Saredon 8 and Saredon 13.			
		HE need to show paths very clearly in large scale on the correct alignments to ensure no ambiguity with landowners regarding the alignment of a right of way or its status.	The location and alignments of all footpaths and bridleways are shown on the Streets, Rights of Way and Access Plans [TR010054/APP/2.7] . These will be agreed with the landowners and included within the definitive land plans associated with the scheme .	Agreed	Agreed	Agreed
Streets, Rights of Way and Access Plans [TR010054/APP/2.7]	SCC Public Right of Way Requirements	Construction traffic will, in some locations, use the public rights of way network. Where PRoW are kept open, signage must accurately reflect that the public have legal right of access over construction traffic.	Noted, any temporary signage required on the PRoW network during construction will be agreed between the Contractor and SCC.	Agreed	Agreed	Agreed
		In places where construction traffic has used the PRoW network SCC expect HE to ensure all path surfaces are fully repaired and improved before	Pre-construction condition surveys will be undertaken ahead of the commencement of works. All PRoW are to be reinstated to a suitable standard upon	Agreed	Agreed	Agreed

		<p>routes reopen. The original character of some of these routes needs to be retained as best as possible.</p>	<p>completion of the scheme.</p>			
		<p>HE need to ensure that planting schemes, new hedgerows, wetland areas, etc. do not negatively impact on the PRoW network. Appropriate natural screening should be in place alongside the PRoW network.</p>	<p>The landscape design is outlined on Figures 2.1 to 2.7 of the ES [TR010054/APP/6.2]. The landscaping design will be further developed at the detailed design phase. Natural screening for PRoW has been included where appropriate.</p>	<p>Agreed</p>	<p>Agreed</p>	<p>Agreed</p>
<p>Streets, Rights of Way and Access Plans [TR010054/APP/2.7]</p>	<p>Proposed Public Right of Way Diversions</p>	<p>Modifications to NMU facilities, at M54 J1, that provide an off-carriageway route are supported along with any necessary crossing improvements and requirements to ensure and improve safety and connectivity. On-carriageway options should also be explored. Shared use routes are considered suitable.</p>	<p>On carriageway facilities have been explored however, due to the cross-section restriction through the structure, separate facilities have been discounted. Further details are provided on the Streets, Rights of Way and Access Plans [TR010054/APP/2.7].</p>	<p>Agreed</p>	<p>Agreed</p>	<p>Agreed</p>

Streets, Rights of Way and Access Plans [TR010054/APP/2.7]	Proposed Public Right of Way Diversions	Shared-use facilities at M6 J11 are also supported to enable NMU access across the junction. Improvements to on carriageway facilities are also welcomed.	On carriageway facilities have been explored however, due to the cross-section restriction through the structure, separate facilities have been discounted. Further details are provided on the Streets, Rights of Way and Access Plans [TR010054/APP/2.7] . NMUs will be encouraged to use the existing A460 and will be directed to the off carriageway facilities through M6 J11 for safety reasons to access the A460 North.	Agreed	Agreed	Agreed
Streets, Rights of Way and Access Plans [TR010054/APP/2.7]	Proposed Public Right of Way Diversions	Severance of Dark Lane and loss of cycle and footway links to/from Hilton Lane should be mitigated with suitable alternative facilities including new crossing infrastructure. Anecdotal evidence suggests that this route is well used by cyclists and walkers/runners.	The current proposals include a new bridleway from Hilton lane to Dark lane to provide the required access.	Agreed	Agreed	Agreed

Streets, Rights of Way and Access Plans [TR010054/APP/2.7]	Proposed Public Right of Way Diversions	Consideration of improved NMU facilities along the existing A460 corridor is supported with the intention to encourage safe sustainable travel along this less traffic dominated corridor. Links to the National Cycle Network are supported. Off-carriageway facilities should be considered where possible.	The A460 is a road which is managed by the local highway authority and is not the responsibility of Highways England. The proposed Scheme retains all existing NMU routes and does not affect any existing NMU routes along the A460. The scheme does not include proposals to improve NMU facilities along the existing A460 corridor. However, Highways England has accepted a designated fund application for an initial feasibility study to identify opportunities to provide improved NMU routes along the existing A460. This will be developed in partnership with key stakeholders including SCC.	Under discussion	Medium	
Streets, Rights of Way and Access Plans [TR010054/APP/2.7]	Proposed Public Right of Way Diversions	New facilities providing sustainable access to Cheslyn Hay along Saredon Road are also supported improving connectivity to	As above, there is potential for such improvements to be provided as part of Highways England's Designated Funds package. However, such improvements fall	Under discussion	Medium	

		Cheslyn Hay Primary school in particular.	outside of the Scheme. No commitment can be made at this stage, however the details will be developed in partnership with key stakeholders including SCC.			
Walking, Cycling and Horse Riding Assessment Report (WCHAR)	WCHAR Assessment – Bus Routes	Routes 854 and 868 are school bus journeys primarily for the use of school children only to access Cheslyn Hay High School. There are other school routes that serve this school that aren't registered so aren't included on the map. Consideration should be given to these and it is suggested that HE contact our passenger transport team to discuss.	Comment addressed in latest revision of WCHAR Report [APP-199/6.3] . To be addressed in detailed design	Agreed	Agreed	Agreed
Walking, Cycling and Horse Riding Assessment Report	WCHAR Assessment – Bus Routes	Routes 54/54A from Wolverhampton to Stafford via i54 and Coven are not shown on the plan or referenced in the text. It is suggested they should be included	Comment addressed in latest revision of WCHAR Report [APP-199/6.3] . Routes now added to Figure in report.	Agreed	Agreed	Agreed

		given they operate within the study area.				
Walking, Cycling and Horse Riding Assessment Report	WCHAR Assessment – Bus Routes	The text in Section 2.3.1 for services 67 and 71 should refer to them being operated by 'Select Bus Company'.	Comment addressed in latest revision of WCHAR Report [APP-199/6.3] .	Agreed	Agreed	Agreed
		The route of service 67 shown on Figure 2.2 is slightly different around Featherstone than shown on Figure 2.2.	Comment addressed in latest revision of WCHAR Report [APP-199/6.3] .	Agreed	Agreed	Agreed
		There are other services in Landywood, Great Wyrley and Cheslyn Hay which aren't referenced in Section 2.3.1 or shown in Figure 2.2, (routes 1, 2, X51), but they are operating in the study area.	These routes are noted in the Transport Assessment Report [TR010054/APP/7.4] as not being impacted by the Scheme and therefore have not been assessed.	To be agreed	High	
		Probably needs a little more detail on Landywood station in terms of service level and frequency other than just a passing reference in the text in 2.3.1.	Comment addressed in latest revision of WCHAR Report [APP-199/6.3] .	Agreed	Agreed	Agreed

Walking, Cycling and Horse Riding Review Report		The application documents need to consider the impacts of the new route on public transport both in terms of permanent effects post completion and during construction, particularly for those routes pass through M6 Junction 11 and/or M54 Junction 1.	The impact on affected public transport routes is assessed in the Transport Assessment Report [TR010054/APP/7.4].	To be agreed	High	
4/ Water environment effects, including any permits required from SCC as LLFA						
Chapter 13. Road Drainage and Water Environment [TR010054/APP/6.1]	Road drainage and the water environment	[SCC please confirm that...] The LLFA is content that the ES appropriately assesses the effect of the Scheme on road drainage and the water environment and that impacts would be managed through adherence to mitigation measures detailed in the OEMP.	Delivery of the OEMP [TR010054/APP/6.11] is a Requirement in the draft DCO. .	Under discussion	High	
	Ordinary Watercourses	The LLFA has previously been consulted on the form, size and design of proposed ordinary	Noted and agreed	Agreed	Agreed	Agreed

		watercourse crossings. This has included a review of the FRA. In principle the LLFA is content with the design proposals. Future maintenance responsibility of these structures will need to be clearly described in the application.				
Consents and Agreements Position Statement [TR010054/APP/3.3]	Land drainage consent	When determining applications for land drainage consent the key topic of concern is flood risk. However, the LLFA is required to also consider compliance with the Water Framework Directive and for this will liaise closely with the Environment Agency.	Noted and agreed	Agreed	Agreed	Agreed
Flood Risk Assessment (Appendix 13.1 of the ES [TR010054/APP/6.3])	Flood Risk	The LLFA is content that the Flood Risk Assessment appropriately assesses the flood risk associated with the Scheme with the exception of the	Noted	Agreed	Agreed	Agreed

		below points on fluvial flood risk.				
	Impact on fluvial flood risk	<p>(Watercourse 2) – Confirms flood depths at the A460 during the 1% AEP plus 50% climate change storm are the same as the baseline scenario.</p> <p>Can you confirm that the frequency of flooding will not be increased here by the Scheme? i.e. What is the lowest return period that flooding is seen at the A460 in the baseline and scheme scenarios?</p>	<p>This is reported in the hydraulic model report (Annex B of the FRA) but not explicitly stated. The following text has been added to the FRA Report to clarify:</p> <p><i>“The baseline model predicts that the first instance of flood risk to the A460 is as a result of a 1% AEP plus 50% climate change storm. The application of the Scheme design to the baseline model shows that there is no change in the return period of the first instance of flood risk, as flood risk in the vicinity of the scheme first occurs during the 1% AEP plus 50% climate change storm event.”</i></p>	Under discussion	High	
		Is there any potential to reduce the flood risk at the A460 by providing additional floodplain storage upstream /	This was considered as part of the option design development; however, it was not explicitly stated in the FRA as it was discounted from the Scheme early on. The following text has been	Under discussion	High	

		downstream of the new culverts?	added to FRA and Hydraulic model report to clarify: <i>"Different Scheme alignments of the watercourse were tested as part of the development of the design. Iterations of this have included the testing of a pond storage area between the main and minor culvert. Whilst this did have a minor impact on water levels at the existing A460 culvert, it was not deemed significant enough to include in the design given the increase in Scheme costs."</i>			
		(Watercourse 3) – confirms that the Scheme does not impact the fluvial flood risk for this watercourse IF the Lower Pool is retained as an online pond. As the model sensitivity testing demonstrated the importance of Lower	The following text was added to the FRA: <i>"4.1.8 The Scheme reshapes the outline of Lower Pool and includes a culvert underneath the new carriageway. The dissection of Lower Pool will reduce its area from 13200m² to 8723m²." "4.1.9 Despite the reduction in size of the</i>	Under discussion	High	

		<p>Pool, and a section of Lower Pool will be lost as a result of the Scheme, can you specify the necessary storage capacity to be retained, or will the detailed design need further modelling to confirm no increase in flood risk?</p>	<p><i>Lower Pool, the Scheme does not impact the fluvial flood risk for this watercourse if the Lower Pool is retained as an online pond. Water levels within the channel are increased in the section of watercourse between the culvert crossing and the Dark Lane culvert, as a result of reprofiling the upstream river reach. However, retaining part of the Lower Pool protects properties at Dark Lane, as well as the existing A460 from potential flood risk."</i></p> <p>The following text has been added to the Hydraulic model report (Annex B of the FRA):</p> <p><i>"The dissection of Lower Pool will reduce its area from 13200m² to 8723m² (approximate values) [...]</i></p> <p>Therefore, it is important that the Lower Pool is retained as an online feature, as it provides flood protection downstream. The current</p>		
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			scheme design showing Lower Pool with an area of 8723m ² does not increase flood risk downstream.”			
	Pond/ weir design	Is there potential to optimise the pond / weir design to reduce flood risk downstream?	This was partially discussed in the Hydraulic model report (Annex B of the FRA), around sensitivity testing. Further text was added to the Hydraulic model report to clarify: “5.3.9 Despite the Scheme reducing the area of the Lower Pool pond from 13200m ² to 8723m ² (approximate values), this does not increase flood risk to properties downstream. However, further sensitivity testing concerning the pond size and weir design should be considered at the detailed design stage.”	Under discussion	High	
Appendix 13.2 Drainage Strategy [TR010054/APP/6.3]	Preliminary drainage design	The LLFA is content that the Drainage Strategy as outlined in Appendix 13.2 of the ES is appropriate and that the requirement to implement this design is captured through adherence to the OEMP. Delivery of the OEMP [TR010054/APP/6.11] is a Requirement in the draft DCO.		Agreed	Agreed	Agreed

		LLFA: The LLFA is content that the submitted Drainage Strategy outlines the key parameters and standards to be followed in the detailed drainage design to achieve these requirements.			
Appendix 13.3 Water Framework Directive Assessment of the ES [TR010054/APP/6.3]	Water Framework Directive	<p>The LLFA is content that the WFD Assessment as reported in Appendix 13.3 of the ES appropriately assesses the impact of the Scheme in line with the Water Framework Directive and that impacts would be managed through adherence to mitigation measures detailed in the OEMP.</p> <p>Delivery of the OEMP [TR010054/APP/6.11] is a Requirement in the draft DCO.</p> <p>LLFA: As noted above, the LLFA's remit in relation to the WFD assessment is limited to the consideration of land drainage consent applications under S23 of the Land Drainage Act, for which we will liaise with the Environment Agency. The Environment Agency raised some concerns about the preliminary WFD assessment.</p>	Under discussion	High	High
OEMP [TR010054/APP/6.11] and Consents and Agreements Position Statement [TR010054/APP/3.3]	Consents and permissions	<p>The LLFA has amended the Water Permits and Consents Register to ensure that this refers more clearly to the diversions/ realignment of Watercourses 2 and 3. However, this remains a live document and will need to be kept under review as the project develops.</p>	Noted and agreed.	Agreed	Agreed

		<p>It will be important that any land drainage consent application for Watercourse 3 also considers changes to Lower Pool to ensure that there is no worsening of flood risk. It may be possible for the Scheme during detailed design to potentially support alleviating flood risk downstream along Watercourse 3 and a commitment to investigating this should be included in the OEMP.</p>	<p>Noted and agreed. The OEMP issued with draft DCO includes commitment D-WAT3 'detailed design of the realignment and diversion of Watercourses 3 and Lower Pool would be undertaken within the detailed design stage. The design will follow best practice to maintain flow, stream processes and ensuring flood risk is not worsened downstream, whilst seeking to provide morphological and ecological enhancement on current channel form.'</p>	Agreed	Agreed	Agreed
		<p>The LLFA and HE agreed that where new ditches are proposed from the highway drainage system to ordinary watercourses, only the temporary works will require land drainage consent (given the attenuation of discharges to the ditches to greenfield runoff rates). It is agreed that wherever possible ditches will be used to discharge treated highway runoff to local watercourses. This avoids the need for engineered outfalls, creates better links to existing green corridors, and improves connectivity with new treatment/attenuation ponds. Drainage ditches and realigned/diverted watercourses will</p>		Agreed	Agreed	Agreed

		be designed to best practice to maximise biodiversity opportunities.			
		<p>[LLFA please confirm that...] The LLFA is content that consents and permissions as outlined in the OEMP and Consents and Agreements Position Statement capture the appropriate consents and permissions relevant to the Scheme.</p> <p>SCC commented on 3 November 2020 that 'LLFA: Cannot locate submitted Consents and Agreements Position Statement, but consents from LLFA will be required as set out in Section 23 of the Land Drainage Act for alterations to ordinary watercourses.' HE will send this to SCC.</p>	Under discussion	High	
5/ Socio-economic effects					
N/A	Socio-economic effects	SCC supports the need for better connectivity to promote economic growth and prosperity; supports the reduction of traffic along the A460; and is supportive of the general principle for the need for a link road between the M54 and M6.	Agreed	Agreed	Agreed
6/The draft DCO provisions and requirements including future procedures for approval of details					
Draft DCO [TR010054/APP/3.1]	Protective Provisions and approval of design	<p>SCC queried whether protective provisions for the benefit of SCC as highway authority would be included in the draft DCO.</p> <p>SCC sent HE a copy of preferred draft protective provisions and indicated that they could operate like a 'section 4</p>	HE confirmed in meetings and by email (23/08/20) that HE does not propose to include such protective provisions in the draft DCO. The works to SCC's highway will be managed and delivered by HE, as an experienced highway authority, in accordance	Under discussion	Medium

		<p>agreement' (i.e. where one highway authority works on another highway authority's road).</p>	<p>with the terms of the draft DCO and to the reasonable satisfaction of SCC. As such, there is no need for further protections to be built into the draft DCO. The principle of this has been accepted by other local highway authorities on other DCO schemes promoted by HE. .</p> <p>Notwithstanding the above, HE did review the draft protective provisions provided by SCC and can confirm that it remains HE's view that protective provisions for SCC are not necessary.</p> <p>HE is aware that, where SCC has been involved in other DCO schemes, SCC has agreed protective provisions with the applicant. However, we understand that private companies rather than another statutory body were promoting those schemes. That would involve additional risk, which warrant additional protections</p>		
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			<p>built into the DCO. The same does not apply in this case. As another highway authority, HE, will carry out the works to SCC highway to the same standard to which it would undertake works on its own highway. In this respect, HE can confirm that any works will be developed and designed having regard to the DMRB.</p> <p>Article 10 of the draft DCO further imposes a requirement on HE to carry out any street works to the reasonable satisfaction of the local highway authority.</p> <p>Save for one exception, other local highway authorities on other HE DCOs (made or applied for) have accepted the above approach as sufficient protection without the need for additional protective provisions. The one exception is A303 Sparkford to Ilchester Dualling DCO and the reason for protective</p>		
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			<p>provisions in that case was due to the complex nature of the works and the proposed adoption of new structures by the local highway authority. The same issues do not apply here, so there is no need for an exception in this case.</p> <p>HE is awaiting a response to the comments above, provided on 23/07/20.</p>			
Other considerations related to the ES						
Chapter 6: Cultural heritage [TR010054/APP/6.1]	Methodology and assumptions	<p>SCC is content that the assessment methodologies applied to undertake the environmental impact assessment as reported within the ES are appropriate. The assumptions and limitations reported in the ES are reasonable and do not impact upon the validity of the assessment findings.</p>	<p>Details of methodologies and assumptions and limitations used to undertake the environmental impact assessment are provided in Section 6.3 and 6.4 of the ES.</p>	Agreed	Agreed	Agreed
	Baseline Conditions	<p>SCC is content that the study area and</p>	<p>Details of study areas and baseline conditions</p>	Agreed	Agreed	Agreed

		baseline conditions reported in the ES is appropriate.	are reported in Section 6.5 and 6.6 of the ES.			
	Mitigation measures	<p>The parties agree that the ES has identified appropriate mitigation measures for archaeological assets.</p> <p>SCC is content that mitigation measures are appropriate to mitigate impacts on unknown known and unknown archaeological assets identified in Chapter 6: Cultural Heritage of the ES [APP-045/6.1]. The parties agree that the archaeological trial trenching is not required to inform the ES, due to the low potential for archaeological remains on the site. Therefore, the trial trenching does not need to be completed prior to decision making on the DCO Application so can be carried out in parallel with the Application or after the DCO is made.</p> <p>The OEMP and Archaeological Mitigation Strategy which form part of the OEMP include the requirement to consider preservation in situ. PW-CH1 of the OEMP details the timing of evaluation trenching. This position is agreed with SCC.</p>		Agreed	Agreed	Agreed
	Impacts and Effects	SCC is content the impact and effect of the Scheme on archaeological assets has been assessed appropriately.	Noted. Impacts and effects on cultural heritage assets are reported in Section 6.7 and 6.9 of the ES.	Agreed	Agreed	Agreed
		SCC is content the impact on the built environment and landscape has been	Additional text was included in the Chapter 6: Cultural Heritage prior to submission of the draft	Agreed	Agreed	Agreed

		assessed appropriately, however will defer to Historic England on this matter as they have had more engagement on this matter, particularly with regards to the impact on Hilton Hall and Hilton Park. It is noted much of the additional information that Historic England requested in our meeting in August has been provided although the noise modelling appears to be outstanding.	DCO, including the results of noise modelling in relation to the built environment and landscape.			
ES Chapter 7: Landscape and Visual [TR010054/APP/6.1]	Hilton Park	SCC note that the significance of Hilton Park as an 18 th century historic parkland is acknowledged in the Preliminary Environmental Information Report. SCC state, although the parkland has already been compromised by the M6 and M54, the cumulative impact	It is noted that the parkland has already been compromised to a degree by the M6 and M54. The impact on Hilton Park has been considered in detail with further research on the park presented in Chapter 6: Cultural Heritage rather than Chapter 7 Landscape and Visual in the ES	Agreed	Agreed	Agreed

		associated with this proposal deserves to be considered, and we would recommend that a more detailed study of the Repton landscape with historic plans overlain on the proposals should be undertaken as part of the ES in order to assess the impact on the Hilton Park historic landscape.				
	Viewpoint Locations	Following the addition of an additional viewpoint from Featherstone Farm/Whitehouse Farm outlying the North side of Featherstone (VP18), the viewpoints are agreed between the parties.	Agreed	Agreed	Agreed	
	Lighting and night-time views	The impact of junction lighting and views of signage gantries should be considered in more detail and incorporated into the visual appraisal. Night time views and impact on tranquillity and dark skies should also be considered.	Night-time viewpoints were agreed at a meeting 02/08/2019. The survey team visited much of the study area at night to understand the baseline lighting levels. Where lighting and signage associated with the Scheme would potentially be visible, this is discussed within the chapter. Tranquillity is also discussed within the ES (7.6.20) and	Agreed	Agreed	Agreed

			illustrated on Figure 7.27 [TR010054/APP/6.2].			
	Mitigation Measures	SCC comments at the consultation stage suggested the creation of heathland vegetation around M6 Junction 11, however the ES has dismissed this as not feasible due to unsuitable soil conditions. SCC accept this point.	Agreed. An explanation as to why heathland creation in this location is not appropriate is provided in paragraph 7.3.28 of the ES.	Agreed	Agreed	Agreed
	Views from Hilton Hall	SCC state that the views from Hilton Hall are some of the most significant and the recommended detailed Historic Landscape study should consider further visual impacts from the parkland during the design development. SCC approve of the views from Hilton Hall being assessed in the heritage chapter providing the landscape team stay involved with the historic assessment and assist in	Viewpoints from Hilton Hall and Portobello Tower have been considered within the ES. Due to the heritage nature of these views, they have been considered as part of the cultural heritage assessment in Chapter 6: Cultural Heritage rather than Chapter 7: Landscape and Visual.	Agreed	Agreed	Agreed

		providing appropriate mitigation measures.				
	Landscape and Visual Assessment	SCC is content the methodology and content of Chapter 7 conform with the DMRB LA 107 (2019) requirements and they provide an accurate assessment of landscape and visual impacts of the proposed Highway works.	Noted	Agreed	Agreed	Agreed
Chapter 8: Biodiversity [TR010054/APP/6.1]	Scope of ecological surveys	SCC has confirmed that the survey coverage and methodologies used are appropriate for the ecological impact assessment including that hazel dormice can be categorically scoped out from further survey.		Agreed	Agreed	Agreed
		SCC are content the survey coverage and methodologies	Noted.	Agreed	Agreed	Agreed
	Habitats	Hedgerow assessment should use the HEGS methodology in addition to the Hedgerow Regulations as it is more reliable as an indicator of habitat quality in Staffordshire. This	Hedgerows to be directly affected have been assessed and evaluated in line with the HEGS methodology (refer to Appendix 8.4: Designated Sites and Habitats [TR010054/APP/6.3] and assessed within the ES Ecology chapter	Agreed	Agreed	Agreed

		would also ensure compatibility with the Local Wildlife Site assessment guidelines.	(refer to Section 8.9), and appropriate mitigation/replacement recommended for any being lost.			
		We cannot find a reference to assessment of veteran trees in their own right, rather than as bat roost potential (which is covered.) Veteran trees should be surveyed and considered in the avoid – mitigate – compensate hierarchy. Survey may also indicate the need to have additional terrestrial invertebrate assessment. Veteran trees are now accepted to be irreplaceable habitat (as with Ancient Woodland.) Older mature trees and intermediate veterans should also be assessed and considered because these are the veterans of the future.	A full tree survey has been undertaken and details of veteran trees are provided in the Arboricultural Impact Assessment Report, Appendix 7.1 [TR010054/AP/6.3] . An assessment of potential impacts has been undertaken in Section 8.9 of the ES chapter.	Under discussion	High	

	Bats	Lesser horseshoe bat is now found further north in the county than previously understood and data searches will not necessarily pick this up. All bat surveys should now consider this species by specifically checking results for it.	HE is aware of the lesser horseshoe records and all of the survey recordings have been analysed for all bat species, including lesser horseshoe. Full results are provided in Appendix 8.7: Bats [TR010054/APP/6.3] .	Agreed	Agreed	Agreed
	Biodiversity net gain	A biodiversity metric should be employed to demonstrate that the scheme achieves at least no net loss. This should use realistic timescales and target conditions for any compensation habitat, for example the target time for new woodland to achieve reasonable condition should be 30+ years.	Biodiversity metrics have been used to assess the Scheme and demonstrate that it achieves no net loss in biodiversity. The biodiversity metric calculation undertaken for the application submitted in January 2020 was based on the method published by Defra in Biodiversity Offsetting Pilots Technical Paper: the metric for the biodiversity offsetting pilot in England (Defra, 2012), to determine effects of the Scheme. Details on and the outcome of the metric are provided in Appendix	Under discussion	High	

			<p>8.2: Net Gain Calculations [APP-176/6.3].</p> <p>A re-calculation using Defra Metric 2.0 has been undertaken by the applicant and submitted to the inspectorate as a revision of Appendix 8.2: Biodiversity Metric Calculations, submitted to the Inspectorate on 9 October 2020.</p>			
	Non-Statutory Designated Sites and Ancient Woodland	<p>SCC remain concerned about possible effects on Lower Pool and Brookfield Farm Local Wildlife Sites (also known as SBIs) through permanent loss of habitat. This may also apply to woodlands that have not yet been confirmed as ancient. If avoidance is not possible, then mitigation effort should be excellent, including translocation and habitat creation with appropriate long-term aftercare. This also</p>	<p>A full account of the effects on Lower Pool and Brookfield Farm Local Wildlife Sites and Oxden Leasow Wood is included within the ES (refer to Section 8.9 of the ES Ecology chapter). The woodlands within Lower Pool and Brookfield Farm have been assessed as to whether they are ancient, the outcomes of which have been agreed with Natural England as set out in the SoCG agreed with Natural England.</p>	Under discussion	Medium	

		applies to indirect effects such as those mentioned for Oxden Leasow Wood.				
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Appendix A – Personnel and organisations referenced in this SoCG

Initials	Name	Role or Discipline	Organisation
AG	Anna Gee	Hydromorphology	AECOM
AK	Andrew Kelly	Project Manager	Highways England
AL	Alison Leeder	DCO Lead	AECOM
AMa	Alex Maddox	Environmental Consultant	AECOM
AMc	Alistair McNeil	Highways Design Lead	AECOM
AS	Amy Spencer	Environmental	AECOM
AW	Adam Wilson	Environmental Consultant	AECOM
BB	Bryan Bradley	Assistant Project Manager	Highways England
BK	Bill Klemperer	Principal Inspector	Historic England
CA	Chris Archer	Flood Team	SCC
DC	Dean Cordelle	Ecologist	SCC
DL	Dave Last	Project Manager	AECOM
DT	Dyfan Thomas	Highways	Amey
FL	Fiona Lee	Archaeology	AECOM
GL	Graham Littlechild	Project Manager	Highways England
HH	Hannah Howe	Flooding/Water	AECOM
HM	Hazel Murrells	Ecology	Tyler Grange
HMac	Helen MacLean	Heritage	AECOM
HP	Howard Price	Landscape Consultant	SCC
JB	Julia Banbury	Landscape	SCC
JC	James Chadwick	SCC Case Manager (planning)	SCC
JCa	Jacqui Casey	Interim Partnership Manager	Stoke & Staffordshire LEP
JCo	Jamie Cooper	Flood Risk	Environment Agency
JF	Jane Field	Planning Specialist	Environment Agency
JFr	Julie Frost	Office Manager	Stoke & Staffordshire LEP
JH	Jim Hunter	Heritage	Highways England
JK	Joanne Keay	Strategy Officer	SCC
JT	Julie Taylor	Inspector of Historic Buildings	Historic England

KH	Kelly Harris	Strategic Planning Team Manager	SSC
KK	Katerina Koukouthaki	Built Heritage	AECOM
KV	Kanishka Varoon	Former Assistant Project Manager	Highways England
LB	Lizzie Bushby	Landscape	AECOM
MG	Matthew Griffin	Team Leader	SCC
MW	Mark Winnington	Cabinet Member for Economic Growth	SCC
ND	Nick Dawson	Connectivity Strategy Manager	SCC
NP	Nick Phillips	Traffic Modelling	AECOM
OT	Owen Tucker	Environmental Scientist	AECOM
PA	Peter Adams		Highways England
RR	Rob Ramshaw	Project Manager	AECOM
RW	Rose Walker	Landscape Architect	AECOM
SBa	Sally Barnett	Highways/Drainage Design	AECOM
SBe	Steve Beech	Project Director	LinkConnex/ BAM
SBI	Suzy Blake	Historic Environment Record Officer	SCC
SC	Stephen Callister	Operations Directorate	HE
SG	Stuart Graham	Ecology	Amey
SH	Simon Hawe	Highways Development	SCC
SK	Shane Kelleher	Archaeology	SCC
SL	Sue Lawley	Ecology	SCC
TB	Tom Bennett	Former Stakeholder Lead	Amey
TE	Trish Evans	Legal	SCC
TP	Tamara Percy	Environmental Lead	AECOM
WS	Will Spencer	Traffic	SCC