



Andrew Kelly
Project Manager
M54M6 Project Team
Highways England
2 Colmore Square
Birmingham
B4 6BN

Planning Inspectorate Case Team M54/M6
The Planning Inspectorate
Major Applications and Plans
Temple Quay House
Temple Quay
Bristol
BS1 6PN

By Email

23 August 2021

Dear Sirs

M54 TO M6 LINK ROAD SCHEME, PINS REF: TR010054

APPLICANT'S RESPONSE TO SECRETARY OF STATE LETTER- 9 AUGUST 2021

Please find enclosed a document providing the Applicant's response to the queries raised in the Secretary of State's letter dated 9 August 2021.

The name of the Applicant on the Development Consent Order application is Highways England. As you may be aware, on 19 August 2021 the announcement was made that Highways England will be changing its name to National Highways. We are now in a transition period as measures are put in place to make this change. However, at the present time for the purposes of this application we are still using the name Highways England and there has been no change to contact details or how we should be referred to in documentation. We will provide further updates on this in due course.

Yours sincerely

A black rectangular box redacting the signature of Andy Kelly.

Andy Kelly

Project Manager, M54 to M6 Link Road

Email: M54toM6linkroad@highwaysengland.co.uk

Tel: 0300 123 5000

Enclosures:

1. 8.31 Applicant's Response to Secretary of State's Letter – 9 August 2021

M54 to M6 Link Road

TR010054

Volume 8

**8.31 Applicant's Response to Secretary
of State's Letter – 9th August 2021**

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

August 2021

Infrastructure Planning

Planning Act 2008

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

M54 to M6 Link Road
Development Consent Order 202[]

8.31 Applicant's Response to Secretary of State's Letter – 9 August 2021

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1. Introduction

- 1.1.1 This document sets out Highways England's response to the Department of Transport's (DfT) letter (see Appendix A of this response) dated 9 August 2021 containing a request from the Secretary of State (SoS) for an update to the environmental information from Highways England.
- 1.1.2 Specifically, the SoS has requested more information related to the climate chapter of the Environmental Statement which are responded to in sections 2 and 3 of this response. There are two parts for the request on climate: part A referring to carbon budgets, and part B referring to cumulative likely significant effects of the scheme with other existing and/or approved projects on climate.
- 1.1.3 In addition, the SoS has also requested an update on outstanding protective provisions from Cadent Gas Limited, Severn Trent Water Limited and Western Power Distribution Limited. This aspect of the request is included in section 4 of this response.

2. Response to Request for an Update to the Environmental Information

2.1. Assessment of compliance with the sixth carbon budget

Secretary of State's request

2.1.1 The Secretary of State requests that the Applicant provides additional information on:

- a) *the scheme's compliance with the sixth carbon budget as set out in the Carbon Budget Order 2021, including an update to the assessment of the impact of the scheme on the carbon budgets as set out in Chapter 14 of the Applicant's Environmental Statement to take account of the sixth carbon budget including for the design year (2039).*

Highways England's response

2.1.2 A summary of the UK government carbon budgets relevant to the scheme is provided below in Table 2-1 (in line with paragraph 14.9.14 of the Environmental Statement), with the addition of information regarding the 6th carbon budget.

Table 2-1 Summary of relevant carbon budgets

Carbon Budget	Carbon Budget Level	Reduction Below 1990 Levels
3rd carbon budget (2018 to 2022)	2,544 MtCO ₂ e ¹	37% by 2023
4th carbon budget (2023 to 2027)	1,950 MtCO ₂ e	51% by 2025
5th carbon budget (2028 to 2032)	1,725 MtCO ₂ e	57% by 2030
6th carbon budget (2033 to 2037)	965 MtCO ₂ e	78% by 2035

2.1.3 As requested by the Secretary of State an assessment of scheme greenhouse gas (GHG) emissions against the UK government carbon budgets has been undertaken covering the GHG emissions that are projected to occur across the relevant carbon budget periods up to and including the sixth carbon budget. The existing Environmental Statement considered the 3rd, 4th and 5th carbon budgets (see paragraphs 14.9.13 – 14.9.21 of the Environmental Statement). Since completion of the Environmental Statement, a 6th carbon budget has been legislated, which has now been incorporated in Table 2-1 and Table 2-2 of this response.

2.1.4 Table 2-2 sets out the proposed Scheme's GHG emissions aligned to the relevant carbon budget periods, including the 6th Carbon Budget. This summarises the GHG emissions for the proposed scheme, including emissions from construction and operation (the latter including road user, operational energy use and maintenance emissions, see paragraph 14.9.17 of the Environmental Statement). As there are no carbon budgets that coincide with the design year (2039), it is not appropriate to speculate on future, and as yet, unlegislated carbon budgets, so GHG emissions have not been projected for the design year.

¹ Million tonnes of Carbon Dioxide equivalent

- 2.1.5 Table 2-2 compares the GHG impact of the 'Do Minimum' option of not building the scheme with the 'Do Something' option of building the scheme. The comparison of the two scenarios provides the net emissions from construction and operation across each carbon budget period.

Table 2-2 Scheme GHG emissions in 5-year periods aligned with relevant carbon budgets (developed from Table 14.15 in the Environmental Statement)

Project Stage	Estimated total GHG emissions over relevant carbon budgets (tCO ₂ e) (DS Scenario)	Net GHG emissions over relevant carbon budgets (tCO ₂ e) (DS-DM)	Scheme GHG emissions per relevant carbon budget (tCO ₂ e)			
			3 rd (2018 to 2022)	4 th (2023 to 2027)	5 th (2028 to 2032)	6 th (2033 to 2037)
Construction	81,890	81,890	33,390	48,500	N/A	N/A
Operation	60,439,970	121,730	N/A	45,060	76,680	78,660
Total	60,525,100	206,860	33,390	93,550	76,680	78,660

- 2.1.6 The scheme has been assessed as contributing 0.0082% to the 6th carbon budget reporting period (2033-2037).
- 2.1.7 It should be noted that this assessment is conservative. It is likely to be an overestimate as the projected uptake of new electric vehicles is higher than the proportions used in the national projections included in Defra's Emissions Factor Toolkit used for the scheme assessment.
- 2.1.8 Furthermore, the recent publication of both the DfT's Transport Decarbonisation Plan² and Highways England's net zero plan³ are likely to further reduce GHG emissions.
- 2.1.9 The DfT's Transport Decarbonisation Plan was published in July 2021. The plan outlines a number of commitments by the government to remove all emissions from road transport to achieve net zero target by 2050. Commitments that will have a direct impact on road user emissions from the scheme will include:
- An end to the sale of new petrol and diesel cars and vans by 2030;
 - All new cars and vans to be zero emissions at the tailpipe by 2035;
 - All new L-category vehicles to be fully zero emissions at the tailpipe by 2035; and
 - The end of the sale of all non-zero emissions HGVs by 2040.
- 2.1.10 In addition, the Government is providing support for at least 4,000 zero emission buses and has committed to holding a consultation on a date to end the sale of new non-zero emissions motorbikes.
- 2.1.11 In July 2021, Highways England also published its own 2030/2040/2050 net zero highways plan. This plan includes commitments to ensure that Highways England's corporate

² [Decarbonising Transport – A Better, Greener Britain \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/978412/Decarbonising_Transport_-_A_Better_Greener_Britain.pdf)

³ [net-zero-highways-our-2030-2040-2050-plan.pdf \(highwaysengland.co.uk\)](https://www.highwaysengland.co.uk/net-zero-highways-our-2030-2040-2050-plan.pdf)

emissions become net zero by 2030, its maintenance and construction activities will become net zero by 2040 and road user emissions on the strategic road network will become net zero by 2050.

- 2.1.12 Highways England recognise that they have a key role in the development and maintenance of a strategic road network that will facilitate the journey to net zero emissions. As part of this the Highways England net zero plan sets out commitments to develop a blueprint for EV charging and energy storage by 2023 and to report to government on global HGV technology trials and set out proposals for trials in the UK in 2022.

Part (a) Response – Summary and Conclusion

- 2.1.13 The contribution of GHG emissions resulting from the scheme is assessed as a maximum of 0.0082% across all relevant carbon budget periods. Highways England therefore does not consider GHG emissions resulting from the scheme to have a material effect on the government's ability to comply with the carbon budgets.

2.2. Update on direct, indirect and cumulative likely significant effects of the Scheme with other existing and/ or approved projects on climate

Secretary of State's request:

- 2.2.1 The Secretary of State requests that the Applicant provides additional information on:

b) building on Chapter 14 of the Applicant's Environmental Statement, the direct, indirect and cumulative likely significant effects of the scheme with other existing and/or approved projects on climate, including greenhouse gas emissions and climate change adaptation.

Highways England's response

- 2.2.2 To support this response the following terms have been interpreted as follows:

- Direct emissions - direct emissions to the atmosphere from relevant activities (e.g. tailpipe emissions from road users or construction vehicles);
- Indirect emissions - indirect emissions resulting from the purchase of electricity (e.g. for infrastructure operation) and/or any relevant downstream activities by third parties within the supply chain (e.g. embedded GHGs from the manufacturing of construction products such as concrete);
- Cumulative effects of the scheme - The consideration of the GHG emissions impact of the scheme with other relevant committed developments included within the traffic model;
- Likely significant effect - An increase in GHG emissions resulting from a proposed scheme that are so significant that the scheme would have a material impact on the ability of Government to meet its GHG reduction targets (as per paragraphs 5.17 and 5.18 of the National Policy Statement for National Networks (NNNPS)).

- 2.2.3 The response to part b of the Secretary of State's request is provided in two parts. The first part relates to the effects on climate, i.e. the GHG aspect of the question, and the second part relates to climate vulnerability, i.e. the climate change adaptation aspect.

Part 1

Direct, Indirect and Cumulative effects of the scheme – GHG emissions

- 2.2.4 Direct emissions are presented in Section 14.5 of Chapter 14 in the Environmental Statement for the proposed scheme.
- 2.2.5 Indirect emissions encompass the accumulation of embedded emissions that occur throughout the construction supply chain (i.e. an accumulation of various emissions sources such as raw material extraction, intra-manufacturing transportation, manufacturing processes etc). These are also considered as part of the quantification of construction emissions in the Environmental Statement.
- 2.2.6 The consideration of the cumulative effects of the scheme with other existing and/or approved projects is inherent within the methodology followed in the Environmental Statement through the inclusion of the scheme and other locally committed developments within the traffic model (see Chapter 5 - Air Quality of the Environmental Statement (APP-044), Chapter 15 - Assessment of Cumulative Effects of the Environmental Statement (APP-054), and the Transport Assessment Report (REP3-036)).
- 2.2.7 UK Carbon Budgets, used to put emissions from the scheme into context, are inherently cumulative as they consider emissions across all sectors of the economy.
- 2.2.8 It was held in the recent case of R (Transport Action Network Limited) v Secretary of State for Transport and Highways England Company Limited (2021) EWHC 2095 (Admin) that in relation to the judgment reached regarding the entirety of the GHG emissions from all schemes within RIS 2 (which includes 5 new schemes and 45 schemes initially named in RIS 1 and to be delivered during the RIS 2 roads period which includes this scheme):

"I see no reason to question the judgment reached by the DfT that the various measures of carbon emissions from RIS 2 were legally insignificant, or de minimis, when related to appropriate comparators for assessing the effect on climate change objectives." (paragraph 159)

- 2.2.9 Therefore, the High Court has concluded that the total amount of GHG emissions from schemes listed in RIS2 is de minimis in the context of appropriate comparators for assessing the effect on climate change objectives.

Part 1 – Summary and Conclusion

- 2.2.10 As explained above, the High Court has concluded that the total amount of GHG emissions for the 5 new road schemes and RIS 1 road schemes to be delivered in RIS 2 is *de minimis* in the context of appropriate comparators for assessing the effect on climate change objectives. Accordingly, Highways England do not consider that GHG emissions on account of this scheme alone, including on a cumulative basis, is likely to have any significant effect on climate or the UK's ability to comply with its carbon budgets.
- 2.2.11 As a result, the increase in GHG emissions associated with the scheme is not a reason to refuse development consent. The increase would have no material impact on the ability of

Government to meet its carbon reduction targets and so the proposed development does not give rise to any conflict with paragraph 5.18 of the NNNPS.

Part 2

Cumulative likely effects of the scheme with other existing and/or approved projects – climate adaptation

- 2.2.12 Direct and indirect climate vulnerability effects are already included within the climate change resilience (CCR) assessment provided within the Environmental Statement. The CCR assessment has included all infrastructure and assets associated with the scheme and has assessed resilience against both gradual climate change and the risks associated with an increased frequency of extreme weather events, referencing UKCP18 data⁴ (details of the climate resilience data is presented in Appendix 14.1 of the Environmental Statement TR010054/APP/6.3). Direct effects of climate change are those identified through the UKCP18 data review, such as heatwave events. The indirect effects are presented as hazards that occur in combination with the direct effect, such as overheated electrical equipment in the example of heatwave events.
- 2.2.13 In addition, as part of the in-combination climate change impact (ICCI) assessment, the combined impacts of future climate change and those associated with the scheme were considered as a cumulative assessment within the scheme. The methodology for this assessment is presented in paragraphs 14.3.28 to 14.3.34 of Chapter 14 Climate in the Environmental Statement. The results of the ICCI assessment are presented in paragraph 19.9.25 of Chapter 14 Climate and Appendix 14.2 of the Environmental Statement.
- 2.2.14 The scheme's Environmental Statement found that none of the potential impacts (during construction or operation) identified in section 14.7 of the Environment Statement would be significant. This conclusion is based on the embedded and essential mitigation⁵ measures outlined in the OEMP [TR010054/APP/6.11], assumed management practices, UKCP18 climate change projections, and information from other environmental disciplines (see Appendix 14.2 for the CCR assessment summary - TR010054/APP/6.3). The ICCI assessment has not identified the potential for significant combined impacts of future climate change and the scheme on identified receptors in the surrounding environment.
- 2.2.15 To supplement the assessment made in the environmental statement, which already includes direct, indirect and cumulative effects, an additional assessment is made here to consider whether other strategic transport infrastructure beyond the boundary of the scheme, which may when subject to climate impacts, have consequences that exacerbate likely significant effects. This has been measured using the consequence and likelihood criteria described at Tables 14.2 and 14.3 in the Environmental Statement.

Study Area

- 2.2.16 Given the scheme's importance to regional transport, cumulative climate vulnerability effects are considered at both local and regional scales. The main transport networks at these

⁴ UK Climate Impacts Programme (UKCIP) (2018) UK Climate Projections 2018

⁵ Embedded mitigation: Design measures which are integrated into a project for the purpose of minimising environmental effects. Essential mitigation: Mitigation critical for the delivery of a project which can be acquired through statutory powers.

scales are shown in Figure B.1, Figure B.2 and Figure B.3 in the Appendix and are described in further detail in the paragraphs below.

2.2.17 Climate vulnerability baseline for cumulative effects

2.2.18 Figure B.1 (Appendix B) shows that alternate road routes around the scheme are primarily provided by A roads, primarily including the A460, A5, and A449.

2.2.19 Collectively these routes surround the scheme and would provide local resilience in the event of climate vulnerability impacts in the area.

2.2.20 Figure B.2 (Appendix B) puts the scheme in a regional context. It shows that:

- Traffic traveling from the south of the scheme (from London and Reading for example) towards Wolverhampton (or vice versa) can interchangeably use the M1, M40 and M5 (as well as a number of A roads) for long distance journeys; and
- Traffic traveling from the west of the scheme (from Wales) towards Wolverhampton (or vice versa) could interchangeably use a number of A roads, including the A458 and the A49, as well as the M54.

2.2.21 All of the above mentioned regional alternate routes are interconnected by other A roads providing some flexibility at an unforeseen point of traffic disruption that caused re-routing.

2.2.22 The rail transport network is presented in Figure B.3 (Appendix B) and shows:

- Main line routes from London, Liverpool and Scotland pass through the study area around Wolverhampton;
- Rail traffic can divert east around the study area through Sheffield via Derby and Birmingham; and
- Rail traffic can divert east around the study area through Shrewsbury.

Potential cumulative climate vulnerability effects

2.2.23 The scheme will improve transport resilience by providing additional capacity on the A460, A449 and A5 by separating local traffic from long-distance and commuter traffic. A number of assets being replaced or improved on the scheme will also be designed so they are more resilient to climate change compared to the existing infrastructure assets. Further details on the climate change mitigation that is embedded into the scheme design can be found in Table 14.11 and 14.12 of the Environmental Statement. For example, with regards to flood risk and anticipated climate change, the scheme has been designed to appropriate standards (see Chapter 13 – Road Drainage and the Water Environment of the Environmental Statement).

2.2.24 Were significant climate vulnerability events to occur and affect one or more strategic routes, it is likely that the broad number of journey options available, coupled with the level of mitigation embedded in the design of this scheme and the rail network (as demonstrated through, for example, the regional weather resilience and climate adaptation plans for the rail network⁶) would provide a sufficient level of systemic resilience to avoid a significant effect

⁶ Network Rail, Route Weather Resilience Plans 2019-2024: [Climate change adaptation - Network Rail](#)

when considered against the criteria for significance in the Environmental Statement (which is aligned with the methodology in LA114 in DMRB).

Part 2 – Summary and Conclusion

2.2.25 Cumulative effects have been considered in the CCR and ICCI assessments. Both assessments have concluded that there would be no significant cumulative climate vulnerability effects associated with the scheme. Cumulative effects have also been considered in the additional assessment of the combined effects on transport infrastructure presented in this report. This assessment demonstrates that the scheme will improve the resilience of the SRN to the effects of climate change.

3. Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 – National Policy Statement for National Networks

3.1.1 The Secretary of State has requested that the additional information to be provided:

'...should be set in light of the requirements set out in the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and in light of paragraphs 5.17 and 5.18 of the National Policy Statement for National Networks ('NNNPS').'

3.1.2 As to compliance with the Infrastructure Planning (Environmental Impact Assessment) Regulations) 2017 (as amended) (the EIA Regulations), the scheme constitutes EIA development for the purposes of those regulations. The scheme is therefore subject to the environmental impact assessment process provided for at regulation 5 of the EIA Regulations, which includes the preparation of an environmental statement. An environmental statement was duly prepared and was submitted with Highways England's application for development consent.

3.1.3 Paragraph 5 of Schedule 4 of the EIA Regulations provides that the environmental statement must, among other matters, include a description of:

"(e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;

(f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;"

3.1.4 The information provided in this response is additional information for the purposes of the EIA Regulations and is provided in response to the Secretary of State's request to assist him in discharging his duty under regulation 21 of the EIA Regulations to reach a reasoned conclusion which is up to date on the significant effects of the scheme on the environment.

3.1.5 The NNNPS, at 5.17 states that "Where the development is subject to EIA, any Environmental Statement will need to describe an assessment of any likely significant climate factors in accordance with the requirements in the EIA Directive" and "It is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet its carbon reduction plan targets. However, for road projects applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets". 5.18 states "...any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets".

3.1.6 In relation to paragraphs 5.17 and 5.18 of the NNNPS, this response, together with the information provided in Chapter 14 of the Environmental Statement, demonstrates that the scheme will not materially affect the ability of the Government to meet its carbon budgets. Accordingly, the increase in GHG emissions that may arise in consequence of the scheme is not a reason to refuse development consent pursuant to paragraph 5.18 of the NNNPS.

4. Update on Protected Provisions

4.1. Cadent Gas Limited (“Cadent”) Protective Provisions

- 4.1.1 The Applicant and Cadent have reached an agreed position regarding the protective provisions. That agreed position is currently being documented and no changes to the protective provisions submitted on 7 April 2021 at Deadline 8 (ref REP8-005) are anticipated. Both parties will write to confirm this position upon concluding the relevant documentation within the next 14 days.

4.2. Severn Trent Water (“STW”) Protective Provisions

- 4.2.1 The Applicant can confirm that since the close of the examination an agreement with STW has been reached. We confirm that the protective provisions within the Development Consent Order submitted by Highways England on 7 April 2021 at Deadline 8 (ref REP8-005) are approved by STW. We understand that STW have written to you separately to confirm this position.

4.3. Western Power Distribution Limited (“WPD”) Protective Provisions

- 4.3.1 The Applicant can confirm that since the close of the examination an agreement with WPD has been reached. We confirm that the protective provisions within the Development Consent Order (ref REP8-005) submitted by Highways England on 7 April 2021 at Deadline 8 are approved by WPD. We understand that WPD have written to you separately to confirm this position.

Appendix A: Letter from Department for Transport – 9 August 2021



Department for Transport

Great Minster House
33 Horseferry Road
London, SW1P 4DR

Telephone: [REDACTED]
e-mail: transportinfrastructure@dft.gov.uk
Web: www.gov.uk/dft

To: Highways England, Cadent Gas Limited, Severn Trent Water Limited and Western Power Distribution Limited

Date: 9 August 2021

Dear Sir/Madam

Planning Act 2008 (as amended) and the Infrastructure Planning (Examination Procedure) Rules 2010

Application by Highways England (“the Applicant”) for an Order granting development consent for the proposed M54 to M6 Link Road.

REQUEST FOR COMMENTS FROM THE APPLICANT, Cadent Gas Limited (“Cadent”), Severn Trent Water Limited (“STW”) and Western Power Limited (“WPD”)

1. Request for an Update to the Environmental Information

The Secretary of State requests that the Applicant provides additional information on:

- a) the scheme’s compliance with the sixth carbon budget as set out in the Carbon Budget Order 2021, including an update to the assessment of the impact of the scheme on the carbon budgets as set out in [Chapter 14](#) the Applicant’s Environmental Statement to take account of the sixth carbon budget including for the design year (2039); and
- b) building on Chapter 14 of the Applicant’s Environmental Statement, the direct, indirect and cumulative likely significant effects of the Scheme with other existing and/or approved projects on climate, including greenhouse gas emissions and climate change adaptation;

which should be set in light of the requirements set out in the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and in light of paragraphs 5.17 and 5.18 of the National Policy Statement for National Networks.

2. Request for an update on outstanding Protective Provisions

Cadent Gas Limited (“Cadent”) Protective Provisions

The Secretary of State notes at the close of the examination an agreement on the protective provisions had not been reached

Please could the **Applicant** and **Cadent** confirm the status of the agreement regarding the protective provisions within the Development Consent Order? If an agreement has been reached. Please could both parties provide the agreed updated set of protective provisions [RR-010].

Severn Trent Water Limited (“STW”) Protective Provisions

The Secretary of State notes at the close of the examination an agreement on the protective provisions had not been reached

Please could the **Applicant** and **STW** confirm the status of the agreement regarding the protective provisions within the Development Consent Order? If an agreement has been reached. Please could both parties provide the agreed updated set of protective provisions [RR-015].

Western Power Distribution Limited (“WPD”) Protective Provisions

The Secretary of State notes at the close of the examination an agreement on the protective provisions had not been reached

Please could the **Applicant** and **WPD** confirm the status of the agreement regarding the protective provisions within the Development Consent Order? If an agreement has been reached. Please could both parties provide the agreed updated set of protective provisions [RR-008].

The deadline for any response is 23 August 2021.

Given the coronavirus (COVID 19) emergency, the Planning Inspectorate are currently unable to accept hard copies of consultation responses. Responses to the matters outlined in this letter should therefore be submitted by email to: M54toM6linkroad@planninginspectorate.gov.uk. If you will have difficulty in submitting a response by the consultation deadline, or difficulty in submitting a response by email, please inform the Case Team.

The responses will be published on the project page for the M54 to M6 Link Road DCO on the Planning Inspectorate’s website as soon as possible after the above deadline at: <https://infrastructure.planninginspectorate.gov.uk/projects/west-midlands/m54-to-m6-link-road/>

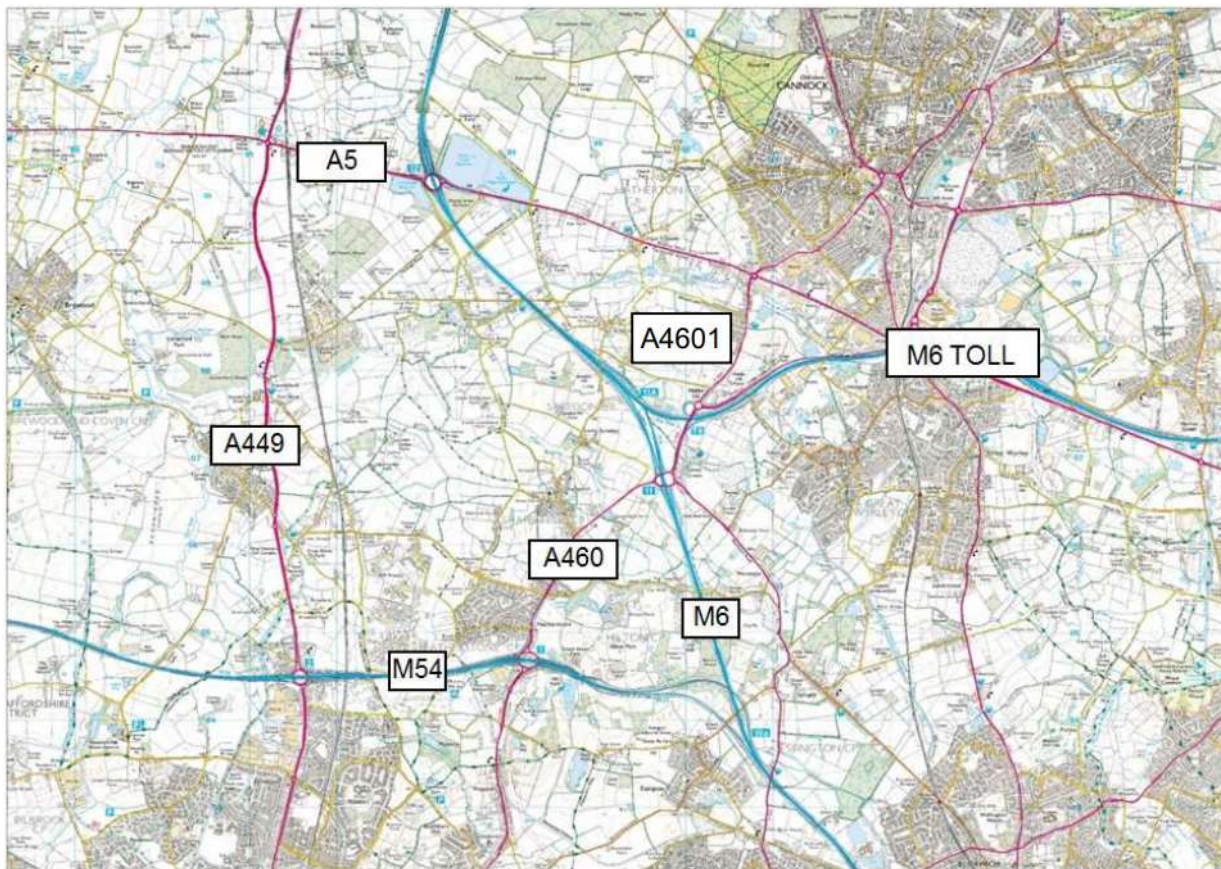
This letter is without prejudice to the Secretary of State’s decision whether or not to grant development consent for the M54 to M6 Link Road, and nothing in this letter is to be taken to imply what that decision might be.

Yours faithfully

Natasha Kopala
Head of the Transport Infrastructure Planning Unit

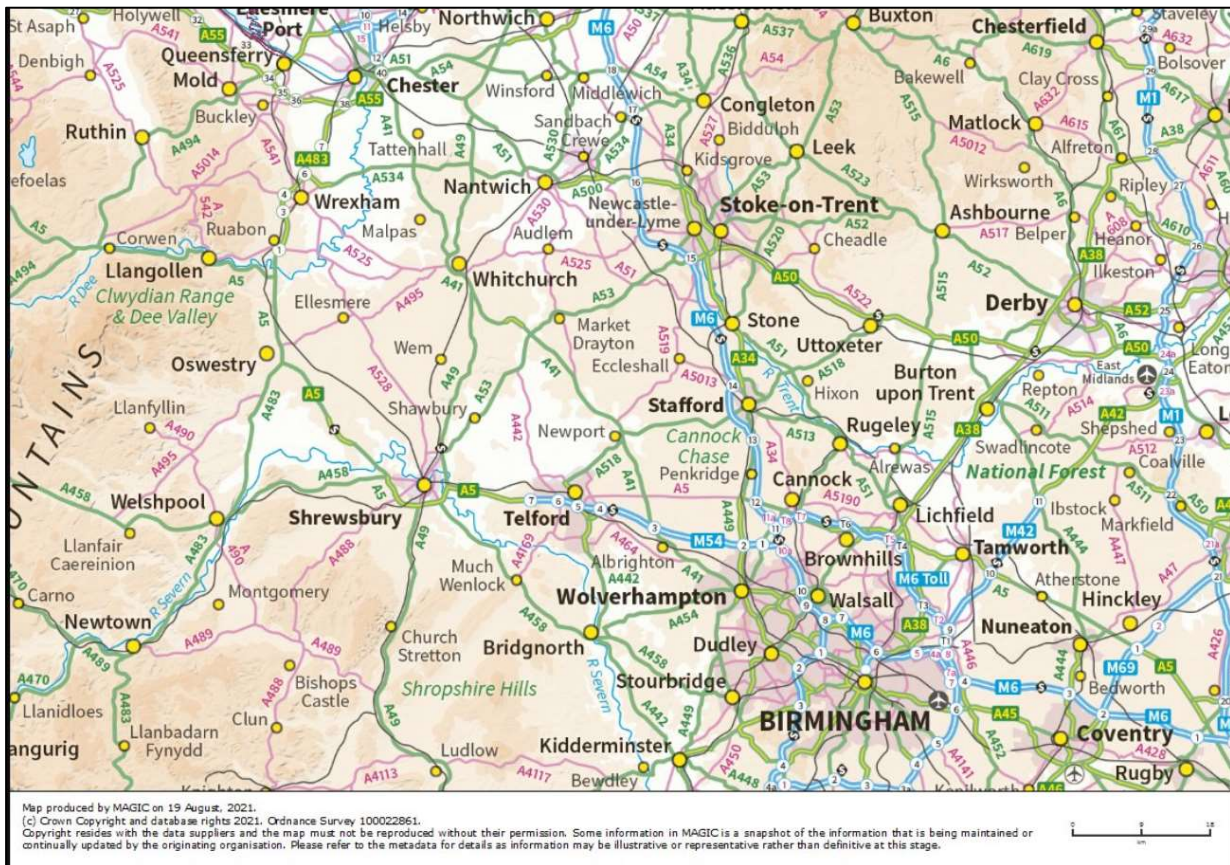
Appendix B: Figures

B.1 – Primary Routes between M54 west and the A5/M6 Toll East (as per Figure 2.3 in the Transport Assessment Report)

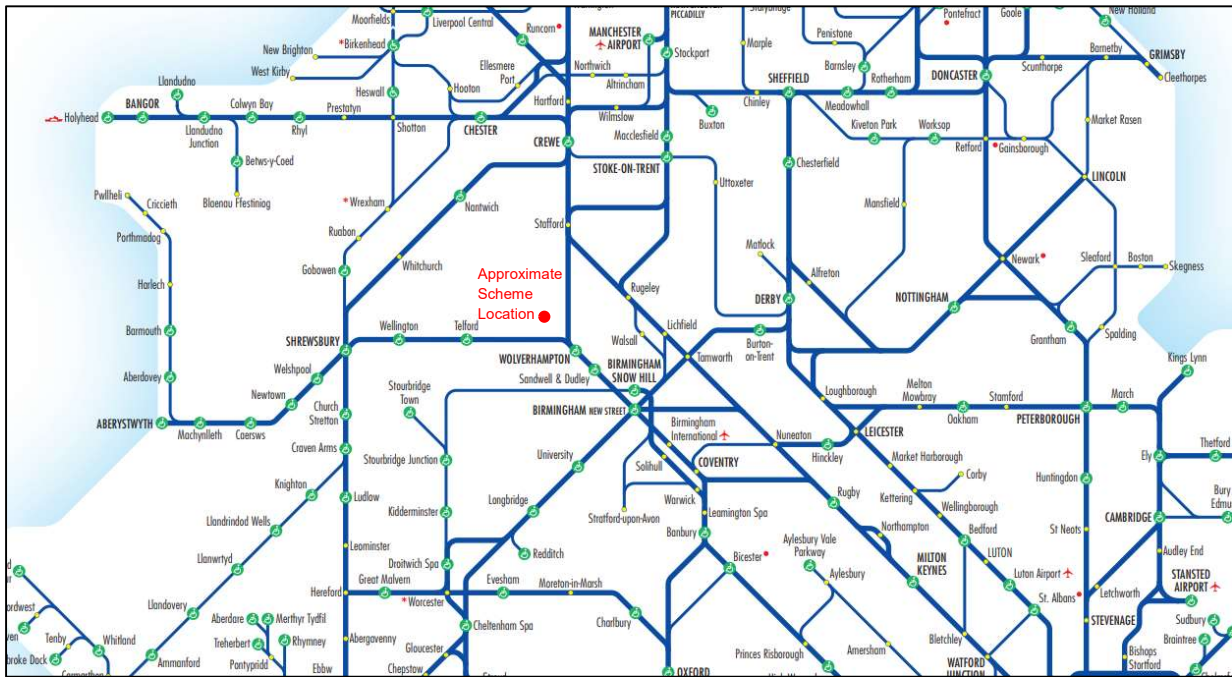


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B.2 – Regional view of Scheme and generalisation of main routes surrounding it.



B.3 – Regional Rail Connections⁷



⁷ [ATOC Large Scale Map - October 2015\(a\).eps \(nationalrail.co.uk\)](https://nationalrail.co.uk/ATOC%20Large%20Scale%20Map%20-%20October%202015(a).eps)