



Application By : **Highways England for M54 to M6 Link Road**

Responses : **South Staffordshire Water plc (SSW)**

SSW's Reference : **20025357**

Responses to the Examining Authority's written questions and requests for information (ExQ1) on behalf of South Staffordshire Water plc



Nationally Significant Infrastructure Projects

M54-M6 Link Road

Written Representations

1. This representation is submitted on behalf of South Staffordshire Water plc with regards to the application made by Highways England for the M54-M6 Link Road. Objection is specifically made to Sections 1.1 (Introduction to the Application) and 2.5 (General Arrangements- Scheme Layout Plans), and to the draft Development Consent Order.

Section 1.1 Introduction to the Application

Section 2.5 General Arrangements – Scheme Layout Plans

2. The proposed M54-M6 Link Road will conflict with one of South Staffordshire Water's 24-inch potable water mains which is crossed by the proposed new link road.
3. The proposed M54-M6 link would require South Staffordshire Water to divert a 24-inch potable water main. This would put at risk the supply of water to 4,700 properties within the Penkridge area and those committed within Development Plans. This could mean that Penkridge could be without water should South Staffordshire Water lose the water main; there is no substantial back feed currently available to support the village. Any loss of the main could also result in South Staffordshire Water taking Slade Heath borehole station out of supply. This would mean that 3.3 million litres per day would be lost and as a consequence pressure would be placed on Hednesford Reservoir and



other feeds to the area. This may result in difficulties in maintaining supply during a summer period especially with committed housing coming forward through Development Plans in the area.

4. It is the position of South Staffordshire Water that they cannot isolate the 24-inch main to undertake the connections required to divert this asset without impacting on the water supply to its customers in the Penkridge area, therefore an appropriate design solution needs to be resolved and agreed.
5. The diversion of the 24-inch main and associated apparatus is a matter of continuing discussion between South Staffordshire Water plc and Highways England. At the present time there are a number of significant outstanding issues still to be resolved. These include the approval of the scheme design for the re-direction and re-laying of the main, including a programme and methodology of works, and also for additional requirements such as a site for the installation of complex apparatus connections potentially on land beyond the DCO red line area. At present the location of these works is unknown until trial holes can confirm suitable ground conditions to accommodate these complex connections.
6. Until a satisfactory and comprehensive design solution has been achieved for maintaining water supplies to the Penkridge area, South Staffordshire Water plc maintains its objection to the proposed M54-M6 Link Road.

Section 3.1 Draft Development Consent Order

7. SSW's primary concern is the impact of the crossing of SSW's apparatus at Dark Lane by the Link Road. The diversion of the apparatus is still being



discussed between the parties and until agreement is reached on the route of the diversion and the locations for connections of the new apparatus into the remaining SSW network have been investigated further SSW's concerns will remain in place.

8. Further, current drafting of the protective provisions of the draft DCO impose a requirement on SSW to remove redundant apparatus which SSW would normally cap and abandon. To remove such apparatus would impose significant costs on SSW.
9. SSW therefore objects to the proposal unless and until such time as an approved programme and methodology of works can be agreed.