

**M54 to M6 Link Road**

**TR010054**

**8.8 P(D) Draft Statement of Common  
Ground with Hilton, Featherstone &  
Brinsford and Shareshill Parish  
Councils**

APFP Regulation 5(2)(q)

Planning Act 2008

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

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**The Infrastructure Planning  
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Procedure) Regulations 2009**

**M54 to M6 Link Road**  
Development Consent Order 202[ ]

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1(P03)	August 2020	Initial draft issued to Parish Councils
2(P05)	October 2020	Issue to ExA for Deadline 1

### STATEMENT OF COMMON GROUND

**This Statement of Common Ground has been prepared and agreed by (1) Highways England Company Limited and (2) Hilton, Featherstone & Brinsford and Shareshill Parish Councils**

Signed.....  
**Andrew Kelly**  
**Project Manager**  
**on behalf of Highways England**  
**Date: [DATE]**

Signed.....  
**[NAME]**  
**[POSITION]**  
**on behalf of Hilton Parish Council**  
**Date: [DATE]**

Signed.....  
**[NAME]**  
**[POSITION]**  
**on behalf of Featherstone and Brinsford Parish Council**  
**Date: [DATE]**

Signed.....  
**[NAME]**  
**[POSITION]**  
**on behalf of Shareshill Parish Council**  
**Date: [DATE]**

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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 that 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. SoCG are an established means in the planning process of allowing all parties to identify and 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 Hilton, Featherstone & Brinsford and Shareshill Parish Councils ('the Parish Councils') during the development of the Scheme and records Highways England's current understanding of the matters agreed and not agreed.
- 1.1.5 A first draft of this SoCG was provided to the Parish Councils on 10 September 2020, with no comments received to date. This second draft incorporates relevant representations made by the Parish Councils and was issued to the Parish Councils on 3 November 2020, but does not represent an agreed draft at this stage. 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 Highways England as the Applicant and the Parish Councils.
- 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 Hilton Parish Council represents Hilton Civil Parish which is broadly bound by Hilton Lane to the north, the M54 to the south, the A460 to the west and the A462 to the east. The parish includes the eastern half of M54 junction 1 as well as the area of the Scheme between this junction and Hilton Lane.
- 1.2.4 Featherstone and Brinsford Parish Council represents Featherstone Civil Parish, an area broadly bound by the A460 to the east, the rail line to west and the Staffordshire / West Midlands county boundary to the south.
- 1.2.5 Shareshill Parish Council represents Shareshill Civil Parish, covering Shareshill village and land beyond. The parish includes land from the Hilton Parish border to just south of M6 junction 11.

- 1.2.6 The Parish Councils agreed to prepare a joint SoCG with Highways England, reflecting the joint approach taken throughout the development of the Scheme.

### 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 these 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 the Parish Councils, 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 the Parish Councils.
- 1.3.3 All documents referenced in this SoCG are given a reference APP-x.x/y. In these references the 'APP' number refers to the number given to documents as presented in the Examination library, available on the Planning Inspectorate website here: <https://infrastructure.planninginspectorate.gov.uk/projects/west-midlands/m54-to-m6-link-road/?ipcsection=docs>. The latter number is the document number for documents as labelled on their covers by Highways England.

## 2 Record of Engagement

2.1.1 A summary of the key meetings and correspondence that has taken place between Highways England and the Parish Councils in relation to the Application is outlined in Table 2-1.

**Table 2-1: Record of Engagement**

Date	Form of correspondence	Key topics discussed and key outcomes
21/11/2018	Meeting between Highways England and the Parish Councils	Highways England provided a presentation followed by a Q&A session.
06/03/2019	Meeting between Highways England and the Parish Councils	Highways England provided an update on progress made with Scheme design and how comments from previous meeting with Parish Councils had been considered. The presentation was followed by a Q&A session.
24/04/2019	Meeting between Highways England and the Parish Councils	Highways England presented an update on the Scheme, including plans for statutory consultation.
23/05/2019	Letter. Highways England to each Parish Council.	Letter sent to each Parish Council providing notice of the statutory consultation. The letter included a copy of the section 48 notice, a consultation brochure and consultation response form.
24/05/2019	Statutory Consultation VIP event	Members of the Parish Councils attended a presentation at the start of the statutory consultation period.
24/05/2019 – 05/07/2019	Statutory Consultation	A number of consultation events were held at various venues in the local area which were attended by members of the Parish Councils.
21/08/2019	Email from TB (Amey) to Parish Council Chairs	Advising that Amey would be no longer involved in the project and that Aecom would be managing stakeholder engagement going forward.
22/10/2019	Email from Cllr Cope to JH (Aecom)	Seeking a date for a presentation to the Parish Councils in advance of the planned presentation to South Staffordshire Council (SSC) members on 05/11/19.
11/11/2019	Letter. Highways England to each Parish Council.	Letter sent to each Parish Council to advise of the non-statutory supplementary consultation.
05/11/2019	Email and call from JH (Aecom) to Cllr Cope	Explanation of delay to arranging meetings with the Parish Council's due to pre-election purdah.

19/11/2019	Email from Cllr Cope to JH (Aecom)	Noting comments raised by landowners as a result of supplementary consultation. Requesting an update meeting for the Parish Councils.
25/11/2019	Email from JH (Aecom) to Cllr Cope	Seeking dates of Parish Council meetings for an update presentation. Responding to questions raised after the supplementary consultation re. access to land for speculative development, movement of attenuation ponds and improvements to Whitgreave's Wood.
19/12/2019	Phone call between AK (Highways England) and Cllr Cope	Phone call to arrange date post purdah to present to the Parish Councils. Agreed that 09/01/20 would be suitable.
09/01/2020	Meeting with Parish Councils	Highways England provided an update presentation, including feedback from the statutory consultation, to the Parish Councils.
09/03/2020	Letter. Highways England to each Parish Council.	Letter sent to each Parish Council to notify that the application had been accepted for examination. The letter included a copy of the section 56 notice and a USB with a copy of the application documents.
17/04/2020	Letter. Highways England to each Parish Council.	Letters sent to each Parish Council to advise of extension to relevant representation period due to Covid-19 pandemic.
20/04/2020	Email from JH (Aecom) to Parish Council Chairs	Email seeking views on Parish Council Chairs on a joint SoCG with the three Parish Councils.
07/05/2020	Phone call between JH (Aecom) and Cllr Dawes	JH spoke to Cllr Dawes (Hilton Parish Council Chair) in regard to joint SoCG proposal. Cllr Dawes confirmed she was happy with this approach and would speak to Cllr Cope and Cllr Beardsmore as JH had not been able to get in contact. HE to prepare draft SoCG for Parish Councils to review.
28/07/2020	Phone call from RR (Aecom) to Cllr Cope and Cllr Dawes  * RR (Aecom) attempted to phone Cllr Beardsmore, but was unable to make contact.	RR phoned the Chairs of the Parish Councils to update them on the project progress and inform them that Highways England intended to request some changes to the application and that there would be a consultation held on these changes, prior to the request being made.  RR sought the views of Cllr Cope and Cllr Dawes on holding a virtual meeting with the Parish Councils to discuss the changes and progress the SoCG, the draft of which would be issued in August.
21/08/2020	Letter. Highways England to each Parish Council.	Letters sent to each Parish Council to inform of consultation on changes to the Application.



02/09/2020	Email from Clerk of Hilton Parish Council to HE	Requesting printed copies of consultation documents.
03/09/2020	Letter, Highways England to Hilton Parish Council	Printed documents sent via post.
10/09/2020	Email from JH (Aecom) to Parish Council Chairs	Provided draft SoCG for review and comment.
20/09/2020	Call and email from Cllr Cope to AK	Requesting meeting between Highways England and the Parish Council Chairs on 24/09/20.
22/09/2020	Email from HE to Cllr Cope	Confirming that AK and RR would be able to attend meeting on 24/09/20.
24/09/20	Meeting between AK, RR and Parish Chairs	Meeting to discuss proposed Scheme changes and items in the 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) the Parish Councils 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 the Parish Councils and Highways England.

#### 3.2 Issues

3.2.1 The table below shows those matters which have been agreed or yet to be agreed by the parties, including the date and method by which it was agreed (if relevant).

**Table 3-1: Issues**

Issue	Comment	Highways England Response	Status	Agreement likely? (app) <sup>1</sup>	Agreement likely? (IP)
Proposed route, proximity to Dark Lane	<p>The Parish Councils support the need for a link road but disagree with the chosen route.</p> <p>The proximity of the route to Hilton and houses on Dark Lane is of particular concern, as well as the impact on the historic parkland and lower pool area.</p>	Highways England have undertaken a detailed appraisal of route options, including two phases of non-statutory consultation on evolving route options. Further detail of this can be found in Chapter 2 of the Consultation Report [APP-024/5.1], Chapter 3 of the Environmental Statement (ES) [APP-24/6.1] and Chapter 3 of the Case for the Scheme [APP-220/7.2]. This includes other options and solutions considered prior to the Preferred Route Announcement (PRA), including the ‘option C’ route considered, located close to the existing M6 corridor.	Under discussion	High	

<sup>1</sup> Indication on likelihood that the matter will be agreed by the close of the Examination period as rated 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.

		<p>A number of alignments have been considered since PRA to move the alignment further away from Dark Lane to address comments from the Parish Council and other parties, this has included:</p> <ul style="list-style-type: none"> <li>• Baseline option – route presented at PRA</li> <li>• Option 1 – moved 18m further east (25m from nearest property on Dark Lane)</li> <li>• Option 2 (option presented at statutory consultation) – moved 28m further east (46m from nearest property on Dark Lane)</li> <li>• Option 3 – moved 37m further east (55m from nearest property on Dark Lane)</li> <li>• Option 4 – moved 173m further east (190m from nearest property on Dark Lane)</li> </ul> <p>Option 1 resulted in little improvement over the PRA alignment and resulted in loss of the majority of trees between the route and Dark Lane (removing the opportunity for retention of screening). Option 3 had a greater impact on Lower Pool and reduced the ability to retain trees for visual screening from Hilton Park but did not move the alignment significantly further from properties. These two options were removed from the final evaluation.</p> <p>Option 4 would have greater impacts on the setting of Hilton Hall than option 2, a greater impact on the historic parkland and require the</p>			
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		<p>removal of 4-7 irreplaceable veteran trees. With the construction of a noise barrier, option 2 was located sufficiently far from Dark Lane as to result in no significant noise or air quality effects for receptors on Dark Lane or Park Road as assessed in the Environmental Impact Assessment (EIA). Option 4 would therefore have greater impacts in terms of heritage and veteran trees but would not remove any significant effects in terms of noise and air quality. It should be noted that any noise barrier erected adjacent to option 4 would also be located in open historic parkland and itself would have adverse visual and landscape effects. For option 2 the noise barrier can be screened by existing and replanted trees.</p> <p>Option 2 has the fewest adverse impacts on the local area and was progressed to the Application. It is noted that in response to the Parish Council's request to move the link away from properties on Dark Lane, Highways England assessed a number of options and moved the link approximately 28 m further east than the option presented at PRA.</p> <p>Highways England believe the Scheme provides the optimum route and design which:</p> <ul style="list-style-type: none"> <li>- limits the loss of ancient woodland on the ancient woodland inventory, veteran trees and ecological habitat losses;</li> </ul>			
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		<ul style="list-style-type: none"> <li>- balances the impact to sensitive residential areas from operational noise with a need to protect the historic character of the area;</li> <li>- provides the highest level of congestion relief for the A460 (and benefits in terms of noise reductions and reduced vehicles emissions for properties closest to the A460 Cannock Road), whilst maintaining good local connectivity;</li> <li>- provides the best journey time and the highest benefit to the local economy; and</li> <li>- responds to consultation feedback in terms of alignment, design and mitigation to provide a balance between the Scheme objectives and environmental, social and economic impacts.</li> </ul> <p>Overall, the route has been extensively considered to develop the best alignment for the project.</p>			
	Proximity of link road to Dark Lane and whether this could be moved further east, and concerns about the noise pollution and air quality levels (RR-025)	Highways England recognises the concerns of residents of the Featherstone and Shareshill Parish and has looked extensively at the route options in this area over the last two years to address concerns. Highways England has undertaken a detailed appraisal of route options, including two phases of non-statutory consultation on evolving route options, details of which are set out in the Consultation Report [APP-024/5.1].	Under discussion	High	

		<p>A number of alignments which moved the alignment further away from Dark Lane were considered following the Preferred Route Announcement (PRA). The options appraisal process is reported in the ES, Chapter 3: Assessment of Alternatives [APP-042/6.1] and ES Appendix 3.2: Dark Lane Alignment [APP-159/6.3]. A presentation on the outcomes of the options assessment was given to SSC Cabinet in November 2019, and a paper circulated providing additional information on the final route at that time. Following the in-depth appraisal of the options, the alignment of the mainline of the link road was moved 25 m further east away from residential properties. It was concluded that this option would have fewer adverse environmental impacts on the local area than other options examined.</p> <p>Impacts and effects resulting from changes in air quality and noise resulting from the construction and operation of the Scheme have been assessed and these are reported in Chapter 5: Air Quality and Chapter 11: Noise and Vibration of the ES [TR010054/APP/6.1]. Chapter 5: Air Quality of the ES reports that properties closest to the Scheme on Dark Lane and Hilton Lane would experience small to medium increases in annual mean nitrogen dioxide concentrations with the Scheme in place. However, all receptors are predicted to be well below the National Air Quality</p>			
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		<p>Objectives, with concentrations less than half the health based objective value with the Scheme in place. The Scheme is therefore not predicted to have a significant effect on air quality.</p> <p>With a noise barrier in place adjacent to the west of the Scheme at Dark Lane, significant adverse operational traffic noise effects are not anticipated at properties on Dark Lane or Park Road. The magnitude of the increase in traffic noise levels is no more than minor at the worst affected facade of any of the properties. The closure of Dark Lane to through traffic results in moderate or major reductions in traffic noise at the facades facing directly onto Dark Lane. At the western end of Dark Lane, the closest properties to the existing A460 are anticipated to experience a significant beneficial effect due to the reduction in traffic on the A460 and Dark Lane with the Scheme in operation. The closure of Dark Lane results in the transfer of traffic onto the western end of Hilton Lane. Significant adverse operational traffic noise effects are anticipated at a small number of properties on Hilton Lane to the west of the Scheme where the magnitude of the increase in traffic noise levels is moderate or close to the minor/moderate boundary at the worst affected façade. At properties at the western end of Hilton Lane adjacent to the A460, and on Hilton Lane to the east of the Scheme (east of the existing junction with Dark Lane) significant adverse effects are not anticipated.</p>			
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		The proposed design changes submitted to the ExA on 9 October 2020 (accepted by the ExA on 29 October 2020) would not alter the conclusions outlined above.			
Air Quality and Noise assessments	<p>The Parish Councils requested air quality and noise assessments.</p> <p>The Parish Councils agree that information has been provided to enable understanding of the impacts.</p>	<p>Air quality and noise assessments have been undertaken and made available in the ES [APP-44 and APP-50/6.1] submitted as part of the application.</p> <p>Chapter 5 of the ES provides an assessment of the Air Quality impact of the Scheme.</p> <p>Chapter 11 of the ES provides an assessment of the noise and vibration impact of the Scheme.</p> <p>As assessments have developed, information has been shared with the Parish Councils on these impacts, including sharing initial proposals for noise barriers during statutory consultation in May 2019. Noise and air quality specialists attended community consultation events in May 2019 and were able to talk attendees through potential effects, although at this stage the Environmental Impact Assessment had not been completed to give firm results. Highways England also brought noise and air quality specialists to both a Parish Council meeting at Shareshill (April 2019) and a meeting at SSC (November 2019) to share results and allow question and answer sessions.</p>	Under discussion	High	



<p>Proximity of link road to existing dwellings</p>	<p>Concern over proximity of link road to existing dwellings in terms of noise, air, light pollution and vibration. (RR-011)</p>	<p>All of these factors have been assessed in the ES. A number of alignment options for the mainline of the Scheme adjacent to Dark Lane were considered during the preliminary design stage, this is set out in Chapter 3: Assessment Alternatives of the ES [APP-042/6.1] and Appendix 3.2: Dark Lane Alignment [APP-159/6.3]. As part of this process the alignment of the Scheme at Dark Lane has been moved further away from the residential properties on Dark Lane by 25m, this option presented the best overall balance of benefits and adverse environmental effects.</p> <p>No significant adverse air quality effects are anticipated at properties on Dark Lane or Park Road due to the operation of the Scheme as detailed within Chapter 5: Air Quality [APP-044/6.1]. The noise mitigation measures on the scheme reduce the adverse traffic noise effect of the new link road on Dark Lane and Park Road such that no properties would experience significant adverse traffic noise effects during operation of the Scheme as detailed within Chapter 11: Noise and Vibration [TR010054/APP/6.1]. The Scheme considerably reduces the volume of traffic on the A460 Cannock Road, which is one of the primary objectives of the Scheme, similarly the closure of Dark Lane to through traffic reduces the volume of traffic on Dark Lane. This results in a significant beneficial traffic noise effect at the</p>	<p>Under discussion</p>	<p>Medium</p>	
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		<p>front façade of properties facing onto the A460 and Dark Lane. Operational vibration is not required to be assessed as part of the ES in line with the Design Manual for Roads and Bridges, as a maintained road surface will be free of irregularities as part of project design and under general maintenance, therefore the Scheme will not have the potential to result in significant adverse vibration effects during operation.</p> <p>The assessment reported in Chapter 7: Landscape and Visual of the ES [APP-046/6.1] considers the impact of lighting as part of the visual assessment. Night-time views were taken from all of the representative viewpoints within Hilton (VP 14 and 20) as part of the baseline surveys, refer to Figures 7.18 and 7.25 of the ES [APP-101 and APP-108/6.2] to understand the current night time views in these locations. Lighting is proposed around the two junctions with the majority of the mainline of the Scheme (1.7 km) being unlit to reduce adverse impacts on residents, nocturnal species (such as bats) and impacts on the setting of listed buildings and the associated historic parkland. No lighting is proposed at Hilton.</p> <p>The proposed design changes submitted to the ExA on 9 October 2020 (accepted by the ExA on 29 October 2020) would not alter the conclusions outlined above.</p>			
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Visual impacts on properties	Hilton Parish Council Relevant Representation: 'the properties will have a total change of view. Loss of amenity - the properties now view the historic woodland park of Hilton Hall with it's trees, birds & nature' (RR-011)	The impact on representative viewpoints within Hilton (Viewpoints 14 and 20) have been assessed and are reported in Chapter 7: Landscape and Visual of the ES [APP-046/6.1]. Views from the junction with Dark Lane and Park Road looking north-east towards the scheme (VP14) would include temporary and short term construction activity during the construction phases. However, by Year 1 of operation, views towards the Scheme would be mainly screened by the proposed noise barrier across much of the view. Landscape mitigation planting has been proposed at this location; filtering views and partially screening them by year 15 of operation. The change in traffic noise level is not anticipated to affect perceived tranquillity, however this would result in a significant adverse visual effect; refer to Figure 7.18 [APP-101/6.2]. Views from residential properties on Dark Lane looking south (VP20) are anticipated to experience a slight beneficial effect by year 15 of operation with the proposed planting restricting views from the upper floors of residential properties towards the Scheme; refer to Figure 7.25 [APP-108/6.2]. The design changes submitted to the ExA in 9 October 2020 do not alter the conclusions outlined above.	Under discussion	Low	
Mile Wall	The Parish Councils have asked that the materials from the wall are preserved and used post construction.	Highways England recognises the importance of Mile Wall to the Parish Councils and wider community. Highways England is working with its consultants and contractors to examine possible	Under Discussion	High	

		<p>options for Mile Wall and will continue to liaise with the Parish Councils in regard to this matter.</p> <p>Please see Appendix B for a draft Mile Wall reinstatement proposal for further discussion.</p>			
	<p>Request in Relevant Representation (RR-025) that the wall is rebuilt using the existing stone at the other end of the mile wall near the Avenue in Featherstone.</p>	<p>Highways England recognises the importance of Mile Wall to the Parish Councils and wider community. Highways England is examining possible options for Mile Wall and will continue to liaise with the Parish Councils in regard to this matter.</p>	<p>Under Discussion</p>	<p>High</p>	
<p>Dark Lane Fence</p>	<p>The Parish Councils would like the corrugated iron fence in Dark Lane replaced with a wooden fence and vegetation (RR-025)</p> <p>Where Dark Lane could be closed off it must be done in a way that fly tippers cannot get access, also the tree planting should include some evergreen trees and some mature trees, not just whips.</p>	<p>The fence is not within the highway boundary and is currently owned by the owner of the adjacent land.</p> <p>Highways England is examining whether works to the Dark Lane fence can be incorporated into the Scheme and will continue to work with SSC and the Parish Councils, together with the landowner, on this matter.</p> <p>The design of Dark Lane where the closure will take place has been previously discussed with the Parish Councils, SSC and SCC. Often at the termination of a road HE would provide a turning head. However, stakeholders have raised concerns that this could encourage fly tipping and undesirable parking. Therefore, as the last property is located very close to the junction with Park Road, HE proposes to terminate Dark Lane immediately after the last property. This would</p>	<p>Under Discussion</p>	<p>High</p>	

		<p>enable the resident to reverse from their property with no further space for people to park. The property would be accessible to refuse trucks stopping/turning in Park Road.</p> <p>The mitigation measures currently proposed are illustrated on the Environmental Masterplan (Figure 2.1 to 2.7 of the Environmental Statement in [APP-057 to 063/6.2] and described in the Outline Environmental Management Plan, [APP-218/6.11]), Ref D-L1 describes provision of a landscape design that includes areas of amenity grassland, grassland with bulbs, species rich grassland and native tree and hedgerow planting. Key elements of the landscape design include: areas of woodland to provide visual screening (particularly for residents of Featherstone, Dark Lane and Hilton Lane), landscape integration and ecological habitat; species rich grassland to provide landscape integration and ecological habitat; individual trees to echo the parkland character around Hilton Park.</p>			
Environmental Mitigation	<p>From Hilton Parish Council questionnaire s42 Consultation Response:</p> <p><i>'The land opposite houses in Dark Lane must be compulsory purchased if this route goes ahead, also the land used for a car boot at moment, and both fields must</i></p>	<p>Mitigation measures are illustrated on the Environmental Masterplan (Figure 2.1 to 2.7 of the Environmental Statement [APP-057 to 063/6.2] and described in the OEMP, [APP-218/6.11]).</p> <p>The area of land required for environmental mitigation both south and north of Hilton has been reduced through the Scheme changes as a result</p>	Under discussion	Low	

	<p><i>be planted as woodland to mitigate natural environments that will be destroyed. The ecology pond on the car boot field must go ahead to mitigate losing part of Lower Pools. Planting this land as woodland would protect Hilton from further development and go some way to mitigate environmental damage.'</i></p>	<p>of ecology surveys completed this year, but a significant proportion of the field used for the car boot sale will still be required.</p> <p>The ecology pond on the car boot field is proposed as part of the Scheme. Highways England agrees the pond and woodland is necessary to mitigate for the loss of habitat at lower pool (ponds surrounded by woodland). A large proportion of the car boot field would be planted with woodland.</p>			
	<p>Request for trees to screen Shareshill from increased noise.</p>	<p>No significant operational traffic noise effects are anticipated in Shareshill village due to the operation of the Scheme. The change in traffic noise levels in Shareshill village due to the implementation of the Scheme is primarily due to two factors: a) the large reduction in traffic flows on the existing A460 at the south-east edge of the village, as traffic is re-routed onto the new link road, which is further away from Shareshill; and b) the small increase in traffic flows on the local roads (Church Road and School Lane) within the village due to re-routing of traffic in/out of the village once the junction with the A460 is relieved of the existing high traffic flows with the Scheme.</p> <p>The noise assessment is based on the impact at the worst affected facade of each residential property i.e. if one facade experiences an increase in traffic noise levels but all the other</p>	<p>Under Discussion</p>	<p>Medium</p>	

		<p>facades experience a decrease then the impact at the property is assessed based on the one which experiences an increase. On this basis the majority of properties in Shareshill village are anticipated to experience a negligible i.e. less than 1 dB (LA10,18h) increase in traffic noise in the Scheme opening year (2024) due to the implementation of the Scheme. At a small number of properties located very close to Church Road, the increase is at the bottom end of the minor category. It should be noted that traffic flows on the local roads within Shareshill village are low both with and without the Scheme in operation. At some properties towards the south-east of the village a negligible or minor reduction in traffic noise levels is anticipated at the worst affected facade, due to the influence of the reduction in traffic on the A460. Based on the outcome of the traffic noise assessment additional mitigation measures to reduce traffic noise levels in Shareshill village are not proposed.</p> <p>The benefits of trees in providing an effective sound 'barrier' are limited and are generally more in terms of a perceived benefit, due to either reducing/removing the view of the road and/or a masking effect due to leaves rustling in the wind, rather than an actual reduction in traffic noise. A substantial depth, density and consistency of vegetation is required to achieve any reduction in noise levels. It is not possible to guarantee any</p>			
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		<p>reductions in traffic noise levels from planting additional trees would be achieved or could be maintained throughout the seasons and over the longer term. Therefore, to ensure a conservative approach the standard UK traffic noise prediction methodology (CRTN) and the standard traffic noise assessment methodology set out in the DMRB, as adopted in the operational traffic noise assessment for the Scheme, do not include any barrier effect for trees. On this basis additional tree planting to reduce traffic noise would not be effective and is not included. No change to the existing vegetation in the vicinity of Shareshill village is proposed.</p> <p>Chapter 7: Landscape and Visual of the ES [APP-046/6.1] assesses views from Shareshill (at the junction with the A460) (VP07) and Little Saredon (VP08 and VP09)- in particular Saredon Hill (VP08). Viewpoints 07 and 09 were not assessed further in the ES due to the limited nature of views towards the Scheme in these locations, viewpoints from these locations are provided as Figure 7.11 and 7.13 of the ES [APP-94 and 096/6.2]. The view from Saredon Hill (VP08) was reproduced as a photomontage to show the proposed landscape mitigation (Figures 7.12C [APP-095/6.2]). On this figure you can see that the strategic planting around Junction 11 has been reinstated to replicate a similar effect to at present. In between the Junction 11 and Hilton Lane, the combination of the Scheme being in</p>			
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		cutting and proposed hedgerow planting and woodland planting would reduce the visibility of the road. It was not considered necessary to include additional woodland beyond that proposed, a decision in line with the Staffordshire Landscape Character Assessment for the Settled Plateau Farmlands LCT: 'Large-scale woodlands should be designed to interlock and still allow views through the landscape whilst screening urban edges, power lines, quarries and busy roads'.			
	RR-025 states that more woodland is needed along the perimeter of the link road between Hilton Lane rising up to Junction 11 on the western side in order to mitigate the noise and visual effect from the link road up on the village of Shareshill.	<p>No significant operational traffic noise effects are anticipated in Shareshill once the Scheme is operational.</p> <p>The change in traffic noise levels within the village are as a result of two factors: a) the large reduction in traffic flows on the existing A460 at the south-east edge of the village, as traffic is re-routed onto the new link road, which is further away from Shareshill; and b) the small increase in traffic flows on the local roads (Church Road and School Lane) within the village due to re-routing of traffic in/out of the village once the junction with the A460 is relieved of the existing high traffic flows with the Scheme.</p> <p>The noise assessment is based on the impact at the worst affected facade of each residential property i.e. if one facade experiences an increase in traffic noise levels but all the other</p>	Under discussion	Medium	

		<p>facades experience a decrease then the impact at the property is assessed based on the one which experiences an increase. On this basis the majority of properties in Shareshill are anticipated to experience a negligible i.e. less than 1 dB (LA10,18h) increase in traffic noise in the Scheme opening year (2024) due to the implementation of the Scheme. At a small number of properties that are very close to Church Road the increase is at the bottom end of the minor category (approximately 1.0-1.1dB change).</p> <p>It should be noted that traffic flows on the local roads within Shareshill are low both with and without the Scheme in operation. At some properties towards the south-east of the village a negligible or minor reduction in traffic noise levels is anticipated at the worst affected facade, due to the influence of the reduction in traffic on the A460. Based on the outcome of the traffic noise assessment additional mitigation measures to reduce traffic noise levels in Shareshill are not necessary.</p> <p>The benefits of trees in providing an effective sound 'barrier' are limited. There may be a perceived benefit, due to either reducing/removing the view of the road and/or a masking effect due to leaves rustling in the wind, but they have a limited effect on traffic noise. A substantial depth, density and consistency of</p>			
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		<p>vegetation is required to achieve any reduction in noise levels. It is not possible to guarantee any reductions in traffic noise levels would be achieved by planting additional trees or that any reductions, if achieved could be maintained throughout the seasons and over the longer term. Therefore, to ensure a conservative approach the standard UK traffic noise prediction methodology (Calculation of Road Traffic Noise (CRTN)) and the standard traffic noise assessment methodology set out in the DMRB, as adopted in the operational traffic noise assessment for the Scheme, do not include any barrier effect for trees. On this basis additional tree planting would not make any difference to the predicted noise levels and no change to the existing vegetation in the vicinity of Shareshill is proposed.</p> <p>Chapter 7: Landscape and Visual of the ES [APP-046/6.1] assesses views from Shareshill (at the junction with the A460) (VP07) and Little Saredon (VP08 and VP09) in particular Saredon Hill (VP08). Viewpoints 07 and 09 were not assessed further in the ES due to the limited nature of views towards the Scheme in these locations, viewpoints from these locations are provided as Figure 7.11 and 7.13 of the ES [APP-094 and APP-096/6.2].</p> <p>The view from Saredon Hill (VP08) was the subject of a photomontage to show the proposed landscape mitigation (Figures 7.12C [APP-</p>			
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		<p>095/6.2]). On this figure you can see that the strategic planting around Junction 11 has been reinstated to replicate a similar effect to at present. In between Junction 11 and Hilton Lane, the combination of the Scheme being in cutting and proposed hedgerow planting and woodland planting would reduce the visibility of the road. There is already a strip of woodland planting proposed to the west of the link road, south of Junction 11. It was not considered necessary to include additional woodland beyond that proposed, a decision in line with the Staffordshire Landscape Character Assessment for the Settled Plateau Farmlands Landscape Character Type (LCT), which states that: 'Large-scale woodlands should be designed to interlock and still allow views through the landscape whilst screening urban edges, power lines, quarries and busy roads'.</p>			
	<p>Concerns over opportunities for net gains for biodiversity. (RR025)</p>	<p>Decisions on DCO applications should generally be in accordance with the relevant National Policy Statement (NPS), which for road schemes is the NPSNN. The NPSNN does not require that schemes achieve a net gain in biodiversity. The NPPF was written to guide decision making on applications submitted under the Town and Country Planning Act regime and was not written to guide decision-making on DCOs. NPPF policies can be relevant and important matters in decision making on DCOs. However, the relevance of the policies on net gain in the NPPF is reduced by clear and recent guidance (July</p>	<p>Under discussion</p>	<p>Medium</p>	

		<p>2019) that achieving net gain is not an aim the Government currently intends to apply to Nationally Significant Infrastructure Projects (NSIPs).</p> <p>As required by the NPSNN, ES Chapter 8: Biodiversity [TR010054/APP/6.1] sets out any likely significant effects on internationally, nationally and locally designated sites of ecological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity. The Scheme avoids significant harm to biodiversity conservation interests, through appropriate application of the mitigation hierarchy including consideration of reasonable alternatives. Where it is not possible to avoid harm, appropriate compensation to address effects to biodiversity have been proposed. Details of the mitigation and compensation measures for biodiversity are set out in Chapter 8: Biodiversity, Section 8.8 of the ES [TR010054/APP/6.1] and the OEMP [TR010054/APP/6.11].</p> <p>The NPSNN makes no reference to achieving net gain in biodiversity being a requirement of the determination process and use of biodiversity to devise compensation proposals is optional. In July 2019 Department for Environment, Food and Rural Affairs (Defra) published Net Gain: Summary of responses and government</p>			
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		<p>response to consultation on the objectives of net gain policy. The document was clear that consultation proposals for a mandatory requirement for net gain did not include NSIPs because they have 'fundamentally different characteristics to other development types. Further, whilst Highways England agree that delivering biodiversity net gain is desirable, it is not at this time required by the PA 2008 consenting regime. It should be noted that Highways England is seeking to acquire land for the Scheme through compulsory acquisition. In order to secure those powers, Highways England must demonstrate that the land subject to compulsory acquisition is required for the Scheme or is required to facilitate or is incidental to the Scheme (section 122 of the Planning Act 2008). This means that, whilst land required to mitigate the impact of the Scheme can be secured through compulsory acquisition, such powers do not extend to the acquisition of land solely for delivering biodiversity net gain. Highways England is nonetheless seeking to fully mitigate the impact of the Scheme on biodiversity so by delivering no net loss in biodiversity.</p> <p>Highways England's project team for the Scheme has submitted an application for funding from their 'designated fund' for an initial feasibility study to identify opportunities and appropriate sites which could be improved to provide biodiversity net gains to be delivered on land</p>			
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		<p>outside of the Order limits in partnership with key stakeholders and landowners. This funding application has been successful and the feasibility study is underway. It is assumed the reference to Hilton Green environmental project refers to the Forest of Mercia CIC, Hilton Green, consultation with this organisation is being undertaken as part of the initial feasibility study. However, this process is separate from the Application and its success or otherwise is not a material consideration for decision making on the Application.</p> <p>Both the highway design and the environmental mitigation are designed to minimise effects on local amenity and biodiversity. Details of the mitigation are set out throughout the ES and summarized in relation to visual amenity and landscape character are set out in Chapter 7: Landscape and Visual, Section 7.8 of the ES [APP-046/6.1].</p>			
Cannock Road	The Parish Councils want the design of the link road to discourage use of the existing A460, Cannock Road.	The new link road will be named the A460 and signage will be provided to direct strategic traffic along the new link road between the M54 and M6. The existing A460 is to be reclassified to an unnumbered local road, retaining the name Cannock Road, and appropriate signing changes will be made to indicate the local nature of this route. All these measures will encourage traffic to use the new link road as opposed to the current A460 and result in a reduction in traffic along the A460 from 26,800 vehicles a day to	Under discussion	High	



		<p>3,020. The design of the road does, therefore, discourage use of the existing A460.</p> <p>Staffordshire County Council will remain the Highway Authority for Cannock Road and can choose to pursue further measures to discourage use if there is justification to do so.</p>			
	<p>Concerns that if there is a problem on the M6 the vehicles are going to exit and cut through the village (RR-011).</p>	<p>All incidents on the motorway and trunk road network result in a certain amount of disruption, with drivers seeking to find alternative routes, including local highways. With such incidents tactical diversion routes can be implemented at the discretion of the police (using symbols on the corners of Advance Direction Signs) however alternative routes cannot be enforced unless there are existing Traffic Regulations in place on them. For the Scheme, it is proposed that if an incident occurred resulting in the closure of the Link Road the strategic messaging equipment would be used to encourage traffic to use the A449/A5 route as an alternative.</p>	<p>Under discussion</p>	<p>Medium</p>	
	<p>Concerns about the excess effect of traffic along the A460 from junction 11 of the M6 to the toll road towards Cannock (RR-025).</p>	<p>The cumulative impacts of the West Midland Interchange, McArthur Glen retail park and traffic dispersing from the M54-M6 Link Road have all been accounted for within the Scheme's 'Core Scenario' forecasts. The 2039 Design Year forecasts indicate that the M6T JT8 junction is at capacity on the A460 northbound arm in this year.</p> <p>The traffic model suggests that further along the A460 towards the Churchbridge Roundabouts,</p>	<p>Under Discussion</p>	<p>High</p>	



		the junctions will operate under capacity in the 2039 Design Year.			
Portobello Tower	The Parish Councils have suggested that Portobello Tower could be appropriate for Designated Funds (RR-025)	<p>In response to this request raised by the Parish Councils, SSC and Historic England, an application has been submitted for Highways England's 'designated funds' to undertake a condition survey and produce a heritage appraisal considering up to four options for the asset, ranging from the prevention of further degradation to the full restoration of the asset. Should funding be allocated, this work would also look at additional sources of funding that could be used in collaboration to support any works to the heritage asset. Should funding be allocated to this feasibility study this will be taken forward outside of the DCO process. This has been discussed with Historic England in a meeting on 30 June 2020. Historic England have confirmed they are content with this approach. This is set out in the Statement of Common Ground with Historic England.</p> <p>For avoidance of doubt, the proposals associated with Portobello Tower and other 'designated funds' applications are not part of the Application and are not material to decision making on this application.</p>	Under Discussion	High	

<p>M6 Diesel garage and A460</p>	<p>Concerns that HGVs will continue to use M6 Diesel and therefore continue to use the existing A460. Concern that there is no weight restriction on the A460 at Featherstone and Hilton.</p>	<p>The forecast reduction in traffic along the existing A460 is 26,800 vehicles to 3,020. In the base year, the traffic model for the scheme shows the HGV two-way flow forecast on the length of the A460 between the Church Road / Hilton Lane junction and the New Road / Dark Lane traffic signal junction would be (1,522 northbound + 1,592 southbound) = 3,114 HGV over a 12-hour weekday period. In 2024 with the Scheme, the HGV two-way flow forecast on the length of the A460 between the Church Road / Hilton Lane junction and the New Road/Dark Lane traffic signal junction would be (168 northbound + 111 southbound) = 279 HGV over a 12-hour weekday period removing 90% of the 3,114 HGV on the A460 when compared to the Base Year.</p> <p>Staffordshire County Council has provided traffic counts for the two entrances at M6 Diesel, which shows a two-way flow of 373 HGV movements over 24 hours to and from the south of M6 Diesel. This count was over 24 hours compared to the 12-hour period above. In general, traffic using fuel stations tends to be passing traffic and some traffic would be expected to use alternative fuel stations when the link road is operational rather than continue to use M6 Diesel. However, even if all traffic currently using M6 Diesel continued to use it, there would still be a very significant</p>	<p>Under discussion</p>	<p>Low</p>	

		<p>reduction in HGV use along the A460 from the 3,114 HGVs in the Base Year.</p> <p>Given that the Scheme is significantly reducing all traffic along the existing A460, including HGV traffic, there is no need for any 'mitigation' measures to further reduce HGV traffic and no justification for the provision of a weight restriction along the A460 as part of the Scheme.</p>			
	<p>Concerns about HGVs routing through the village reiterated in Relevant Representation (RR-011)</p>	<p>Highways England assume that by 'through the village' the Parish Councils mean using the existing A460. Smaller roads around Hilton are unlikely to attract HGV traffic before or after the Scheme construction. The Scheme will close Dark Lane eliminating through traffic on this road in Hilton.</p> <p>The traffic model forecasts that in the 2024 'with Scheme' scenario there would be 279 2-way HGV trips between the Church Road/Hilton Lane and New Road/Dark Lane Junctions as opposed to 3,114 in the existing Base Year Scenario. This is a reduction of over 90% of HGVs along the A460. Even if counted data from M6 Diesel is added independently to this section of the A460 then only approximately 650 daily HGVs could be expected on this part of the A460 post Scheme opening. Even if all traffic using M6 Diesel continued to use the existing A460, which is highly unlikely, the Scheme would still reduce HGV traffic on the current A460 by 79% and HGV traffic would only be 7% of traffic along the road.</p>	<p>Under discussion</p>	<p>Low</p>	

		A technical note explaining the basis of this high level assessment will be issued to the Examining Authority at Deadline 3.			
	Concerns about HGVs routing through the village reiterated in Relevant Representation (RR-025)	Traffic count data shows that the majority of trips associated with HGVs travelling to and from M6 Diesel are along the A460 to the north - i.e. between M6 Junction 11 and M6 Diesel. With the construction of the Scheme this form of accessing M6 Diesel is likely to become more pronounced due to the reduced journey time along the link road compared to the A460. Hence there is unlikely to be an increase in HGV traffic at the central/southern end of the A460 trying to access M6 Diesel.	Under discussion	Low	
	Concerns that there is no weight restriction on the A460 at Featherstone & Hilton (RR-011)	The current proposals do not include any restrictions on HGVs along the existing A460, nor does Highways England see any justification to do so as the current traffic model suggests a restriction would be unnecessary.	Under discussion	Low	
A460 layby - Shareshill	The Parish Council have requested that the layby on the A460 at Shareshill is removed as part of the Scheme.	The closure of the layby on A460 does not form part of the Scheme.  The existing A460 is operated by SCC and is not a Highways England road. HGV parking along local authority maintained roads is not an issue that Highways England would aim to address unless it was to mitigate an impact of the Scheme. In this case, the Scheme will significantly reduce HGV traffic along the A460 and does not reduce HGV parking elsewhere so would not appear to have an impact on the use of	Under discussion	Low	

		<p>the layby. Indeed, it is possible that the reduced HGV use of the A460 will reduce use of the layby.</p> <p>Highways England have investigated whether this work might be eligible for funding through an application for 'designated funds', however the proposal does not meet the funding criteria.</p>			
Hilton Cross footway / cycle link	Direct footway/cycle link to strategic employment site of Hilton Cross.	Highways England are proposing a new shared footway/cycleway from the A460 (north of Junction 1) through M54 Junction 1 which ties into the existing footway on the A460 south of Junction 1 which takes you to Hilton Cross. This is shown on the Streets, Rights of Way and Access Plans (TR010054/APP/2.7) submitted as part of the Application.	Under discussion	Medium	
Access to public footpaths	The Parish Councils require assurance that residents would still have access to the public footpaths already in existence in the area, and a green bridge over the link road. (RR-025)	The Scheme proposes to retain connectivity of existing Public Rights of Way (PRoW) that are severed by the Scheme. Chapter 12: Population and Human Health [APP-051/6.1] assesses and reports the impacts on the users of PRoW, please refer to paragraphs 12.9.33 to 12.9.39. No significant effects have been identified for walkers, cyclists and horse-riders as a result of the Scheme. All PRoW will be maintained on their existing alignment where possible. Where an existing route is severed by the Scheme an appropriate permanent diversion route will be provided. No PRoW would be permanently closed without a suitable alternative route provided by the Scheme.	Under Discussion	High	

Articles and Requirements	N/A	Highways England has not received any comments on the Articles or Requirements on the draft Order from the Parish Councils.	Under discussion	High	
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## Appendix A – Personnel

<b>Initials</b>	<b>Name</b>	<b>Role or Discipline</b>	<b>Organisation</b>
AK	Andrew Kelly	Project Manager	Highways England
RR	Rob Ramshaw	Project Manager (Aecom)	Aecom
HE	Highways England	Referred to when responding through M54 email mailbox/address	Highways England
JH	Jon Harvey	Stakeholder manager	Aecom
TB	Tom Bennett	Former stakeholder manager	Amey
Cllr Cope	Cllr Bob Cope	Chair of Shareshill Parish Council, Featherstone and Shareshill Ward Councillor	Shareshill Parish Council,
Cllr Beardsmore	Cllr Frank Beardsmore	Chair of Featherstone Parish Council. Featherstone and Shareshill Ward Councillor	Featherstone Parish Council
Cllr Dawes	Cllr Pam Dawes	Chair of Hilton Parish Council	Hilton Parish Council



## Appendix B - Draft Mile Wall reinstatement proposal

