



Meeting note

Project name	M54 to M6 Link Road
File reference	
Status	Final
Author	The Planning Inspectorate
Date	13 November 2019
Meeting with	Highways England
Venue	Temple Quay House
Meeting objectives	Draft Documents and submission
Circulation	All attendees

Summary of key points discussed and advice given:

The Inspectorate advised that a note of the meeting would be taken and published on its website in accordance with section 51 of the Planning Act 2008 (the PA2008). Any advice given under section 51 would not constitute legal advice upon which applicants (or others) could rely.

The Inspectorate provided comments on the draft application documents submitted by the Applicant, these comments can be seen in the table below. The Applicant provided the following responses to the Inspectorate's advice:

- **Q No. 11 – Draft Development Consent Order.**
The Applicant confirmed that it will consider amending this to refer to the 'environmental masterplan' as opposed to the 'illustrative environmental masterplan', for clarity. The Inspectorate advised that when aspects of a project are depicted in an illustrative format it can sometimes leave details of the scheme unclear.
- **Q No. 12 - Draft Development Consent Order.**
The Applicant stated that it is intending to submit a Transport Management Plan but was not intending on submitting an Archaeological Written Scheme of Investigation (WSI) at this point. This approach has been agreed with the County Archeologist and is consistent with the known archaeological significance of the application site. The Inspectorate noted that it can be beneficial to submit a draft WSI to provide the Examining Authority with comfort regarding the mitigation measures to be secured in the event that consent is granted.
- **Q No. 4 – Draft Land Plans.**
The Applicant expressed its' intention to align the Land Plans with the Work plans upon completion of the documents.

Temporary Working Areas

A discussion took place regarding the way that temporary working areas could be shown on the Work Plans, taking into account the Limits of Deviation currently depicted and the potential impacts that could occur if the highway alignment was moved to the outer limits. The Applicant described that there may be areas within the red line boundary, not currently listed in the Works Plan as being areas allocated to works, which may be needed temporarily for access purposes. The Inspectorate advised that justification must be provided for any land take occurring within the scheme and that the Environmental Statement (ES) must assess accurately every type of work in every location of the development.

Supplementary Consultation

The Applicant informed the Inspectorate that it is carrying out a supplementary consultation due to minor changes to the order limits of the scheme relating to the location of an attenuation pond, inclusion of the existing A460 to enable reclassification of the existing road, inclusion of Whitgreaves Wood for ancient woodland enhancements and the diversion of a utilities pipeline. The Applicant confirmed that they are consulting any additional Category 1 and 2 parties on the changes and stated that they did not believe there to be any additional Category 3 parties. The consultation is due to finish in mid-December 2019.

The Applicant is also consulting all landowners on changes to temporary and permanent land take since the statutory consultation period.

Program Update

The Applicant stated that its anticipated submission date was Q1 2020. The Inspectorate asked if the Applicant has shared draft documents with the local authorities. The Applicant responded that it intends to do this before the submission date. The method of an electronic submission for application was agreed upon between the Inspectorate and the Applicant.

M54 to M6 Link Road

Section 51 Advice –draft Application Document by Highways England for PINS review

This advice relates solely to matters raised upon PINS review of the draft application documents submitted by Highways England (“the Applicant”), and not the merits of the proposal. The advice is limited by the time available for consideration and raised without prejudice to the acceptance or otherwise of the eventual application. It is provided to assist the preparation of the next iteration.

Abbreviations used

PA2008	<i>Planning Act 2008</i>	BoR	<i>Book of Reference</i>	dDCO	<i>draft Development Consent Order</i>
EM	<i>Explanatory Memorandum</i>	ExA	<i>Examining Authority</i>		
SoR	<i>Statement of Reasons</i>	SoS	<i>Secretary of State</i>		

General Drafting points

1. The Applicant should ensure that when the development consent order (DCO) is finalised all internal references and legal footnotes are checked and that the drafting follows best practice in Advice Note 15 and any guidance on statutory instrument drafting.
2. Notwithstanding that drafting precedent has been set by previous DCOs, whether a particular provision in this DCO application is appropriate will be for the Examining Authority (ExA) to consider and examine taking account of the facts of this particular DCO application and having regard to any views expressed by the relevant authorities and interested parties.

Draft Development Consent Order			
Q No.	Article (A)/ Requirement (R)	Extract from DCO (for ease of reference)	Comment/Question
1.	Article 3 – development consent etc, granted by the Order		Notwithstanding other precedents, the EM should explain further the effect of and necessity for Article 3(2). How much land (and how far from the DCO boundary) might be affected by the provision? What enactments are likely to be engaged?
2.	Article 4 – maintenance of the authorised development		Although this would be a matter for examination the applicant should consider whether the limitation to the extent of maintenance authorised in this Article 4 (and via the definition) should apply to maintenance authorised elsewhere in the DCO.
3.	Article 6 – Limits of deviation	(b) deviate vertically from the levels of the authorised development shown on the engineering drawings and sections to a maximum of [0.5 metres] upwards or [0.5 metres] downwards	The Applicant should ensure that the limits of deviation specified in the dDCO are consistent with assessments as set out in the Environmental Statement.
4.	Article 12 – temporary stopping up and restriction of use of streets	(6) If a street authority which receives an application for consent under paragraph (4) fails to notify the undertaker of its decision before the end of the period of 28 days beginning with the date on which the application was made, it is deemed to have granted consent.	The Inspectorate would ask to whether this has been agreed with the relevant Local Authorities.
5.	Article 18 – protective works to buildings	18.— (1) Subject to the following provisions of this article, the undertaker may at its own expense carry out such protective works to any building which may be affected by the authorised development [within the Order	Notwithstanding drafting precedent in other DCOs, the EM should explain why this power is necessary in the circumstances of this particular NSIP.

Draft Development Consent Order			
Q No.	Article (A)/ Requirement (R)	Extract from DCO (for ease of reference)	Comment/Question
		limits] as the undertaker considers necessary or expedient.	
6.	Article 19 – authority to survey and investigate land	<p>19.— (1) The undertaker may for the purposes of this Order enter on any land shown within the Order limits or which may be affected by the authorised development</p> <p>(2) No land may be entered or equipment placed or left on or removed from the land under paragraph (1) unless at least 14 days’ notice has been served on every owner and occupier of the land.</p>	Notwithstanding drafting precedent in other DCOs, the EM should explain why this power is necessary in the circumstances of this particular NSIP. Has justification been provided for the 14-day notice period?
7.	Article 23 – compulsory acquisition of rights and restrictive covenants		<p>Full justification should be provided for the power to impose restrictive covenants. The applicant should note paragraph 26 of Advice Note 15:</p> <p>“Before deciding whether or not the power is justified the Secretary of State will need to consider issues such as proportionality; the risk that the use of land above or below a structure could be sterilised if it has to be acquired outright in the absence of a power to impose restrictive covenants”.</p> <p>Note also the Secretary of State’s decision (paragraph 62 of the M4 Motorway (Junctions 3 to 12) (Smart Motorway) DCO)</p>

Draft Development Consent Order			
Q No.	Article (A)/ Requirement (R)	Extract from DCO (for ease of reference)	Comment/Question
			“to remove the power to impose restrictive covenants and related provisions as he does not consider that it is appropriate to give such a general power over any of the Order land as defined in article 2(1) in the absence of a specific and clear justification for conferring such a wide-ranging power in the circumstances of the proposed development and without an indication of how the power would be used”.
8.	Article 35 – felling or lopping of trees and removal of hedgerows	(1) The undertaker may fell or lop any tree or shrub within or overhanging land within the Order limits, or cut back its roots, if it reasonably believes it to be necessary to do so to prevent the tree or shrub	Notwithstanding precedents, this article still requires justification in the circumstances of this particular NSIP. Is reference to ‘any’ tree or shrub too broad in scope.
8a.	Article 37 – Trees subject to tree preservation orders	37.(1) The undertaker may fell or lop any tree described in Schedule 8 (Trees subject to tree preservation orders) or cut back its roots or undertake such other works if it reasonably believes it to be necessary in order to do so to prevent the tree or shrub	The Applicant is advised to clarify the number and location(s) of any trees subject to Tree Preservation Orders that are likely to be impacted by the scheme and ensure they are depicted on the relevant plans.
9.	Article 39 – defence to proceedings in respect of statutory nuisance		The applicant should explain why this article is necessary in the circumstances of this NSIP.

Draft Development Consent Order			
Q No.	Article (A)/ Requirement (R)	Extract from DCO (for ease of reference)	Comment/Question
10.	Schedule 1 – authorised development Work No. 49	<i>'shown on sheet number 1105 of the Work Plans...'</i>	Work No.49 is listed as appearing on sheet 1105 but is shown on sheet number 1106.
11.	Schedule 2 Article 5 – Landscaping	(2) The landscaping scheme must reflect the mitigation measures set out in the REAC and must be based on the illustrative environmental masterplan annexed to the environmental statement (application document [6.3]).	The Applicant is advised to clarify what an 'illustrative environmental masterplan' contains and the purpose it serves.
12.	General		The Inspectorate notes that the dDCO makes no reference to providing the following documents: <ul style="list-style-type: none"> • Transport Management Plan • Draft Archaeological Written Scheme of Investigation (WSI)
13.	General		The Inspectorate acknowledges that the document is still being drafted and that the Applicant is aware that several of the Schedules are incomplete, to be finalised upon submission.
14.	General		The Applicant is advised to ensure that all cross references within the dDCO are checked and corrected where necessary, this includes references to any plans.

Draft Explanatory Memorandum			
Q No.	Paragraph	Extract from EM	Question/comment
1.	General		The Planning Inspectorate acknowledges that the documents submitted are in the draft stage and notes that there are incomplete sections of the EM that are in brackets. We assume this refers to elements of the document that are at draft stage and will be finalised upon submission.
2.	General		<p>The Inspectorate acknowledges that the Applicant will be updating this document in line with the dDCO in due course but has also invited comments on all aspects of the Exam.</p> <p>The Inspectorate notes that there are instances where Articles are not numbered accordingly to correspond with the dDCO. For example;</p> <p>Article 35 in dDCO pertains to 'Felling or lopping of trees and removal of hedgerows' and in the ExM as 'Application of landlord and tenant law'.</p>
3.	5.13	<p><i>Article 4 - Maintenance of authorised development</i></p> <p><i>This article empowers Highways England to maintain the development. "Maintain" is defined in article 2(1) as including ["inspect, repair, adjust, alter, remove or reconstruct"]</i></p>	The Inspectorate recognises that this document is in draft stage and notes that the definition of 'maintain' is not yet listed in Article 2 at this stage.

Draft Land Plans			
Q No.	Land Plan Ref	Extract from Plan Key (for ease of reference)	Question/Comments
1.	General		The legend contains a reference to 'Land not included within the order limits', yet there is no land highlighted reflecting this on the plan.
2.	General		Please ensure plans and all references to plans are consistent throughout the suite of application documents upon submission.
3.	General		<p>A number of plots lie between red boundary lines and are not visible on the draft Land Plan, for example; 5/1c & 5/10.</p> <p>The Applicant is advised to note that, as per the DCLG guidance related to procedures for the compulsory acquisition of land, Annex C;</p> <p><i>'Where the order involves the acquisition of a considerable number of small plots, the use of insets on a larger scale is often helpful'.</i></p>
4.	General		The Inspectorate would ask the Applicant if there is potential to consider aligning the Land and Work Plans to enable ease of comparison at any Examination.
5.		<i>LAND PLANS REGULATION 5(2)(i) SHEET 5 OF 8</i>	One draft Land Plan submitted, as titled 'Land plans regulation 5(2)(i) sheet 5 of 8. The Applicant is advised to ensure that the outstanding seven maps are robust before submitting as part of the Application.
6.	5/3c		<p>Plot reference does not appear on the map.</p> <p>Listed in the BoR as;</p>

Draft Land Plans			
Q No.	Land Plan Ref	Extract from Plan Key (for ease of reference)	Question/Comments
			<i>'All interests and rights in land comprising approximately 39 square metres of fishing lake land Public Open Space'</i>

Draft Statement of Reasons			
Q No.	SoR Ref	Extract (for ease of reference)	Question/Comments
1.	1.1.1	<i>The second column of each table sets out the corresponding Works numbers as shown on the Works Plans and the broad uses for which the plot in question is required.</i>	The second column depicts the DCO Work No, with the third column listing the purpose for which the land is required.
2.	General		Annex B of the SoR has not been submitted.
3.	General		The Applicant is advised to be consistent across the suite of documents when referring to works. For example, dDCO work No's 27 & 28 referred to in Annex A do not correspond with those listed in the DCO and there appears to be further instances of this throughout the document.
4.	General		The Applicant is advised to be consistent across the suite of documents when stating the size of works. For example, DCO Work No. 32 is listed in the SoR as being approximately 240 metres in length whereas the dDCO states the works as being 320 metres in length.
	(Annex A)	<i>As shown on sheet No. 1105 of the works plans and being the</i>	Plot number 5/4a on the Land Plan corresponds to Work No's 25 & 26 as listed on sheet No. 1106 of the Work Plan.

5.	Plot number 5/4a DCO Work No. 25 & 26	<i>construction of a realigned Hilton Lane including a structure over the M54 - M6 Link road.</i>	The Applicant is advised to list all sheets where works and plots lie, particularly if plots cross the cut lines of maps.
6.	(Annex A) Plot numbers 5/7 & 5/8b DCO Work No.29	<i>As shown on sheet No. 1105 & 1106 of the work plans and being the realignment of the M6 Junction 11 northbound diverge slip road (approximately 240 metres in length).</i>	The dDCO lists Work No. 29 as; <i>'shown on sheet number 1106 of the Work Plans and being the realignment of the A460 to M6 Junction 11 (approximately 320 metres in length)'</i> If this work appears on sheet No. 1105 of the Work Plans, the Applicant is advised to update the dDCO to reflect this.
7.	(Annex A) Plot number 5/12b & 5/12d DCO Work No. 31	<i>As shown on sheet No. 1106 of the works plans and being the closure of Mill Lane from the Junction between Mill Lane and the A460 and approximately 250m along Mill Lane and the of and the construction of a turning head facility.</i>	Work No. 31, as listed in the Statement of Reasons, does not appear on sheet No. 1106 of the Work Plans. The dDCO also lists Work No. 31 as; <i>'shown on sheet number 1104 of the Work Plans and being the construction of a new structure on the M54 to allow the construction of a new junction arrangement under the motorway'</i>
8.	(Annex A) Plot number 5/12h DCO Work No. 69	<i>As shown on sheet No. 1105 of the work plans and being the construction of a Bridleway for the realignment of Public Right of Way (Bridleway) Shareshill 1.</i>	The dDCO lists Work No. 69 as; <i>'shown on sheet numbers 1104 and 1105 of the Work Plans and being the diversion of a overhead electricity cable and associated infrastructure due to the construction of the M54 - M6 Link Rd'.</i> Plot 5/12h also appears on sheet number 1106 of the Work Plans.
	(Annex A)		The purpose for which the land is required, according to the referred to DCO Work No 75, is missing in the SoR.

9.	Plot number 5/1f DCO Work No. 75		Work No. 75 does not appear on the Work Plan or Schedule 1 of the DCO.
10.	(Annex A) Plot number 5/35 DCO Work No. 36 & 39		Plot 5/35 appears on Land Plan as 'No powers sought in DCO' and to be outside the red line boundary in the Work Plan. There is also no reference to this plot in the Book of Reference.

Draft Works Plans			
Q No.	Work Plan Ref	Extract from Schedule 1: Authorised Development (PART 1)	Question/Comments
1.		<i>Could the Inspectorate confirm whether the temporary working areas need to be shown on the work plans? At present the purple shaded areas, named on the key as the 'linear highway work limit of deviation' include the main highway works and limits of deviation, but we have not included areas that may be required temporarily on either side of the outer Limits of Deviation also within the purple area. The intention would be for any applicable areas in the Land</i>	<p>The Inspectorate advises that each parcel of land should be justified in the Statement of Reasons, whether permanent or temporary.</p> <p>The Inspectorate also asks the Applicant to make it clear how the proposal conforms with s122 and the guidance relating to the procedures for compulsorily acquired land.</p> <p>The Inspectorate advises that a compelling reason must be provided to justify the need for land required temporarily. If land is required for a 'lettered work', the Applicant should relate back to how the Environmental Statement deals with the specific environmental effects from undertaking those works.</p>

Draft Works Plans			
Q No.	Work Plan Ref	Extract from Schedule 1: Authorised Development (PART 1)	Question/Comments
		<i>Plan to then be explained in the Statement of Reasons as areas to facilitate construction of the adjacent works. We would appreciate your view on this approach. Larger construction areas such as the site compounds have been shown as separate works items.</i>	
2.		<i>WORK PLAN REGULATION 5(2)(J) SHEET 6 OF 10</i>	One draft work plan submitted as titled 'Work plan regulation 5(2)(J) sheet 6 of 10. The Applicant is advised to ensure that the outstanding nine maps are robust before submitting as part of the Application.
3.	Work No.60		Listed in dDCO Schedule 1 as; <i>'the installation of drainage attenuation and treatment systems to the south of M6 Junction 11. Works to include the installation of a balancing pond and swale to provide attenuation and treatment.'</i> This should be clearly defined or identified on the key.

Draft Consultation Report			
Q No.	Paragraph/ Section	Extract from CR (for ease of reference)	Question/Comments
1.	2.3.10	<i>An online web-chat was available on 21 January between 13:00 and 14:00 to enable people to ask questions of the project team</i>	The Inspectorate suggests that it could be helpful to add the year, for clarity to the reader.
2.	2.3.11	<i>At each of the information boards were used to provide details of the proposed route options...</i>	Is this a grammatical error?
3.	2.3.14 & 2.5.14 & 3.2.9	<i>...by completing and submitting an electronic version of the response form via the scheme webpage: www.highways.gov.uk/roads/road-projects/M54-to-M6M6-Toll-Link-Road</i>	The Inspectorate notes that this link is no longer valid, we appreciate that the name of the scheme was changed and assume it is as a result of this.
4.	2.8.7	<i>The Chapter [X] in the Environmental Statement identifies where issues raised by statutory consultees in the consultation responses contained within the Scoping Opinion have been considered and addressed in the EIA.</i>	The Applicant should ensure cross ref are updated and the reader is directed to the relevant chapter, upon completion of the documents for application.

Draft Consultation Report			
Q No.	Paragraph/ Section	Extract from CR (for ease of reference)	Question/Comments
5.	3.2.3	<i>section 48 - consultation bodies (the Planning Inspectorate confirmed in a letter to Highways England on [insert date of letter] that no persons had been identified under regulation 11(1)(c) of the EIA Regulations. A copy of this letter is provided in Appendix [X].</i>	The Applicant is advised to ensure all references are correct upon completion of the documents for application.
6.	3.4.11	<i>Land referencing has been undertaken throughout the pre-application period to ensure that any changes in ownership or new interests have been identified, consulted and subject to engagement.</i>	The Applicant is advised to continue due diligence to ensure that any further new land interests are identified.
7.	3.4.23	<i>There will be some differences in the consultee list and the Book of Reference as following comments from the statutory consultation and discussions with affected parties, the draft order limits have been amended to <u>remove interested parties</u>. As a result of the issued Land Interest Questionnaire responses some parties have been removed from the Book of Reference after confirming that they do not have an interest within the draft order limits</i>	Please ensure that the correct terminology is used, should this be 'affected persons' as opposed to 'interested parties'?

Draft Consultation Report			
Q No.	Paragraph/ Section	Extract from CR (for ease of reference)	Question/Comments
8.	3.6.12	<i>An initial event was held on 24 May at Wolverhampton University to publicise the consultation</i>	The Applicant could add the year for clarity.
9.	Table 3.8		Hyperlink to scheme page does not work. The Applicant is advised that whilst the website address is correct, the address should be re-linked without the apostrophe and full stop to function correctly.
10.	Table 3.8	<i>To ensure key stakeholders are notified of events, we will also send leaflets to these parties listed in Appendix A. We will also provide these stakeholders with a link to the scheme webpage containing consultation information and invite stakeholders to publicise the events on their own websites and e-mail lists to try to reach a wider audience'.</i>	The 'Accordance with commitment' field pertaining to this commitment remains blank.
11.	Table 5.13	<i>'...there will be a supplementary consultation in November 2019 to seek feedback on this proposed change'.</i>	As this version of the CR is still in draft form, the Applicant must ensure that the section providing further information regarding the aforementioned consultation is robust and clearly states whether the consultation is statutory or non-statutory.
12.	Appendices		It is noted that appendices are signposted within the text, due to be completed, but are not supplied and therefore cannot be checked by the Inspectorate with a view to providing the Applicant with additional advice.

Draft Consultation Report			
Q No.	Paragraph/ Section	Extract from CR (for ease of reference)	Question/Comments
13.	General		When referencing other application documents within the CR, it would be useful if the Applicant provides the full document reference number, eg. Para XX (x bullet point)" The Book of Reference [TR010054/APP/XX] title of the paragraph/section."
14.	General	<i>Conclusion</i>	It is noted that the conclusion is unfinished. The Applicant is advised to ensure it has specified how the guidance has been complied with when submitting the documents for acceptance.
15.	General		<p>The approach to summarising and reporting feedback appears adequate, recognising that the document is in the early stage of its development.</p> <p>The Applicant could consider, if a change is made as a result of feedback, of listing where the change applies and at what stage of the consultation process the change was made.</p>

Draft Book of Reference			
Q No.	Paragraph/ Section	Extract from [abbreviation of doc] (for ease of reference)	Question/Comments
1.	General		<p>The Applicant is advised to include;</p> <ul style="list-style-type: none"> • a Contents page; • an Introduction setting out the purpose of the document and; • Book of Reference description.

Draft Book of Reference			
Q No.	Paragraph/ Section	Extract from [abbreviation of doc] (for ease of reference)	Question/Comments
2.	5 / 18f (Crown Land interests)	<i>Land comprising approximately 23,394 square metres of existing highway M6 slip road at Junction 11 and verges</i>	<p>The Applicant is advised to note that, as per the DCLG guidance related to procedures for the compulsory acquisition of land, Annex B(2);</p> <p><i>If provisions to compulsorily acquire such interests are to be included in a development consent order, then the consent of the appropriate Crown authority is needed. It is important that such consent is obtained at the earliest opportunity as the development consent order cannot be made by the Secretary of State until the consent of the Crown authority is in place.</i></p> <p><i>The applicant for a project should ensure that any discussions with the Crown authority are started as soon as it is clear that an interest in Crown land will need to be acquired – i.e. before their application is submitted to the Planning Inspectorate for acceptance. The aim should be to ensure that Crown consent is in place before the application for the development consent order is submitted.</i></p> <p><i>If consent is not granted by the time an application is submitted, then the applicant should give an indication of when they expect consent to be received.</i></p>
3.	General		The Applicant is advised to cross-refer to the relevant Article in the DCO, in Part 1 of the Book of Reference.

Draft Book of Reference			
Q No.	Paragraph/ Section	Extract from [abbreviation of doc] (for ease of reference)	Question/Comments
4.		<i>Feedback is invited on the format of the table</i>	The Inspectorate advises that there is no issue with the format of the tables, providing the Applicant is satisfied that all necessary information is included.

Habitats Regulations Assessment No Significance Effect Report			
Q No.	Paragraph/ Section	Extract from [abbreviation of doc] (for ease of reference)	Question/Comments
1.	N/A	<i>General</i>	The Habitats Regulations Assessment No Significance Effects Report has been submitted as an appendix of the Environmental Statement ((ES) Appendix 8.2). The Inspectorate advises that this report is presented separately.
2.	2.1.1	<i>Guidance</i>	The report has been prepared in accordance with DMRB Volume 11, Section 4, Part 1, HD44/09. The Inspectorate is aware of the publication of LA 115, which replaces HD44/09. The Applicant should be aware of this updated guidance.
3.	3.1.11	<i>"The current average load reported at Cannock Chase SAC is 30.24 kg/ha and at Cannock Extension Canal is 14.5 ha/yr".</i>	<ul style="list-style-type: none"> ○ Could the text make clearer that Cannock Chase and Cannock Extension Canal constitute two separate SACs. ○ The Applicant provides the current average loads for Cannock Chase SAC and Cannock Extension Canal SAC, however the source of the baseline data is unclear. The Applicant should provide/reference sources of data that have been used to inform the assessment and make effort to

			<ul style="list-style-type: none"> ○ agree the baseline data with the appropriate consultation bodies. ○ The Inspectorate considers that “<i>ha/yr</i>” may require correction/clarification.
4.	References		The Inspectorate notes that the Air Pollution Information System (APIS) website cited in paragraph 3.1.9 does not feature within the reference list (Chapter 5). It would be helpful for there to be greater consistency between citations, references provided in Chapter 5 and sources of data as provided in Annex D.
5.	Annex D	The “ <i>Explain why these effects are not considered significant</i> ” row of the table is empty.	For clarity, the Applicant should complete this box, even if the outcome is ‘N/A’.
6.	Annex D	“ <i>Are the appropriate statutory environmental bodies in agreement with this conclusion?</i> ”	As highlighted by the Applicant, evidence of any relevant consultation/ agreement with Natural England (NE), as well as other statutory nature conservation bodies (SNCBs), in relation to the identification of European sites, potential for likely significant effects (LSE) and approach to the in-combination assessment, should be provided.
7.	Annex D	“ <i>Wo carried out the assessment</i> ”	Spelling error.

General

1. Where references are provided to other Application documents it would be beneficial to provide the full title thereof inclusive of document reference number. Should further draft documents be provided for review, the Applicant may wish to consider providing a full list of known application documents (for purpose of sign-posting) as well as their respective reference number.
2. [DCLG: Application form Guidance](#), paragraph 3 states: *The application must be of a standard which the Secretary of State considers satisfactory: Section 37(3) of the Planning Act requires the application to specify the development to which it relates, be made in the prescribed form, be accompanied by the consultation report, and be accompanied by documents and information of a prescribed description. The Applications Regulations set out the prescribed form at Schedule 2, and prescribed documents and information at regulations 5 and 6.*