

Mr. Stephen Pratt BA (Hons) MRTPI
c/o Amanda Willis
Programme Officer
South Staffordshire Council
Council Offices
Wolverhampton Road
Codsall, WV8 1PX

3rd November 2017

Dear Sir,

Re: South Staffordshire Local Plan, Site Allocations Document Examination

Matter 4.18 (b) - Staffordshire County Council statement in relation to land to the west and east of the ROF Featherstone site

- i. Are the reasons for allocating this proposed extension fully justified with robust evidence, including demonstrating the exceptional circumstances for releasing the land from the Green Belt and the need for the development; is the proposed site suitable, available, sustainable, viable, developable and deliverable within the plan period; and should further land be allocated or safeguarded to meet future employment needs?***

SCC Council response

Staffordshire County Council is fully committed to helping bring forward the former ROF Featherstone site building on our track record of success, in delivering successful employment sites. These successes have included direct public sector intervention such as at i54 South Staffordshire, in partnership with South Staffordshire Council and Wolverhampton City Council, and working alongside private sector developers to overcome abnormal off- site infrastructure constraints to open up challenging allocated employment sites, such as Four Ashes Park (South Staffordshire District) and Meaford Business Park (Stafford Borough).

The case for a modest extension to the existing ROF Featherstone allocation was introduced through the South Staffordshire Local Plan Core Strategy Policy 7 which supports the modest extension of existing free standing employment sites within the



District. The confirmation of these extension proposals is now being articulated spatially by the Site Allocations Document, in particular SAD Policy 5. The principle of modest extensions to the sites was introduced in the Black Country and South Staffordshire Sub-Regional High Quality Employment Land Study [SD85], and suggests that modest extensions should be between 20% and 50% of the original employment site to which an extension is being sought.

This is considered to be a proportionate and justified approach to meeting the needs of local employment requirements, as well as providing for the wider requirements for high quality employment land from the Black Country, which has been a long-standing policy approach, supported previously through the Staffordshire and Stoke-on-Trent Structure Plan and the West Midlands Regional Spatial Strategy. Postcode mapping of the origin of employees working at the i54 Staffordshire site demonstrates the importance of that site in providing employment opportunities for residents of the Black Country and it is anticipated that the former ROF Featherstone site will provide a similar level of employment opportunity over the longer term.

In assessing the possibilities for identifying modest extensions to the freestanding employment sites, South Staffordshire Council has used a robust methodology, including a Green Belt review to consider the development potential of sites against their location, appropriateness and contribution to the performance of the functions of the Green Belt. The benefits of bringing forward employment development at the site through a viable and deliverable scheme are considered to provide the exceptional circumstances to justify the release of Green Belt land.

Prompted by lack of delivery to date at the ROF Featherstone site, a Viability and Delivery Options Study [SD87] was carried out to understand why ROF Featherstone had not come forward having been allocated in previous Local Plans. This concluded that unattractive access to the site was the primary barrier to delivery, which in turn impacts the marketability of the site.

The Viability and Delivery Options study considered various access options, and concluded that a development scheme with modest extensions and which would allow for a range of B1/B2 and B8 uses, would meet some of the wider justified employment land needs and would be viable for an end user, taking into consideration the developer contributions that will be required to part fund the new access arrangements, off site mitigation works and on-site remediation. Building on the findings of this study, Staffordshire County Council has worked closely with the site promoters; Saint Francis Group Ltd (SFG) and South Staffordshire Council to ensure the land released is sufficiently attractive to the market, and as result a viable and deliverable site. Further details relating to the work undertaken to date are set out in the response to Matter 4.18 b (ii) below.

The proposed extensions to the site are within the limit of 50% of the original site area, as recommended in the aforementioned Black Country and South Staffordshire Sub Regional High Quality Employment Land Study and are expected to make the site viable and deliverable. As such, the further allocation or safeguarding of land at this location is not considered to be appropriate within this stage of the SAD process.

- ii. Does the proposal address all relevant considerations, including impact on the local road network, environment, landscape, heritage assets (including listed buildings), residential amenity and wildlife, adequacy of infrastructure/services and flood risk?**

SCC Council Response

Staffordshire County Council, South Staffordshire Council and SFG have been working together for almost 2 years to ensure that the ROF Featherstone site can be brought forward in the most appropriate manner. The detail of the appropriate mitigation will eventually be contained in an Environmental Statement accompanying the planning application for the site. This application will identify the proposed development phasing, off-site highways works and the preferred access arrangements. It is expected to be submitted by SFG around 6 months after receipt of the SAD Examination report.

To date, a proportionate amount of evidence has been prepared by Staffordshire County Council to support the extension of the former ROF Featherstone site through the SAD process as set out below.

Access Road Stage 1 Options Assessment Report (including community & stakeholder engagement)

Staffordshire County Council commissioned AMEY to undertake technical work to consider potential site access road options and the potential impacts of the proposal on the highway network as part of a WebTAG compliant full Stage 1 and Stage 2 Transport Appraisal.

Amey produced a Stage 1 Options Appraisal Report (OAR 1) that reviewed the proposed 9 site access options for ROF Featherstone. This report and all of its appendices are available as part of the SAD evidence base as document reference [SAD 108 a-d].

The Stage 1 OAR assesses the need for improved access to the site, current transport problems in the proximity of the development site, key physical constraints and the objectives of improving access to the ROF Featherstone site, against all theoretical access options to the ROF Featherstone site. As part of the Stage 1 process a significant community consultation exercise was undertaken during February 2017, the results of which can be seen in the appendices to the OAR [SAD 108 – d]. The latter identified Option 7 as the preferred route for a new access road (59%) with options 6 and 9 as the next most popular (both 11%)

In accordance with the WebTAG guidance, the Department for Transport's (DfT) Early Appraisal Sifting Tool (EAST) was utilised to assess each of the 9 access options to the ROF Featherstone Site. The EAST process considers each option against the Strategic, Economic, Financial, Management and Commercial Cases for the scheme.

As part of the assessment of the Economic Case, high level assessments of economic growth, carbon emissions, socio-distributional impacts, local environment and well-being factors were undertaken providing a proportionate level of assessment on the anticipated impact of the access road at this stage of the scheme's development.

The Stage 1 OAR concluded that two access route Options 7 and 9 (see appendix 1) are considered to be viable and deliverable, subject to detailed costings and environmental mitigation (which will be defined in the Stage 2 OAR and EIA) and planning consent.

Although the previously referenced EAST process does highlight some of the potential environmental impact of access road Option 9 on the local environment, further more detailed work commissioned by SFG has reported on the heritage constraints and opportunities and the landscape and visual appraisal considered against the ROF Featherstone development site itself, and access Options 7 and 9 [SAD 103 and 104]. The heritage report concludes that the development site, and associated access routes would have less than substantial harm on local heritage assets in their immediate proximities, and that in accordance with paragraph 134 of the NPPF, development should not be precluded on this basis. We are aware that meetings have taken place between the site promoters and the National Trust to consider potential mitigation to the heritage assets, and are now in receipt of written confirmation that, although they do not support road Option 9, the National Trust agree the harm is less than substantial. A scheme of 'Without Prejudice Mitigation Measures' has also been presented by the National Trust in the event that Option 9 emerges as the preferred access solution.

Likewise, the introduction of new built form is not inconsistent with the immediate site landscape and visual context and, in addition, a proposed landscape strategy will ensure that the proposed development can be assimilated with the local landscape character. As such, the proposed development is considered to be acceptable in landscape and visual terms.

Moving on from the Stage 1 OAR, technical work to underpin the appraisal of the two access options as part of the Stage 2 OAR process is well advanced and will be completed following the announcement of a preferred alignment for the proposed M6/M6 TOLL/M54 link road. The Stage 2 OAR will include a second public consultation process informing the recommendation for a preferred route choice for the ROF Featherstone Access Road. On the basis of the principle of an access road and the site being included within the final SAD Documents, Staffordshire County Council anticipates that a decision on the preferred access road can be made in summer 2018.

The Stage 2 OAR will include significant additional detail relating to the potential impact of the two access road options including:

- Strategic Fit
- Value for Money
 - Impact on the Economy

- Impact on the Environment
- Impact of the Society
- Public Accounts
- Distributional Impacts
- Indicative Benefit Cost Ratio
- Financial Case
- Delivery Case
- Commercial Case

To inform the Stage 2 process Amey have developed new strategic (VISUM) traffic models, by adapting existing models previously developed by consultants for Highways England. The geographical scope of the earlier model networks were extended and new traffic counts and journey time data collected to rebase the models and re-validate them in line with guidance. Validated models have been used as a basis for forecasting traffic levels in 2018, 2021 and 2032 and estimating the routes used by traffic entering and exiting the ROF development, including use of Options 7 and 9.

So far, transport modelling work has been undertaken on a robust basis using a 'worst case' assumption of trip generation and distribution. Traffic routing assumptions for ROF Featherstone will be refined for further analysis once a preferred alignment and construction programme for the proposed M54/M6/M6T link road has been confirmed, which is anticipated by the end of 2017.

Initial transport modelling assumptions (the scope of which have been agreed by Highways England and Staffordshire County Council's Highways development control team) suggest that under the scenarios of background growth and committed development, there are likely to be capacity issues on both the A460, A449, and along the local highway network although the level of severity of these capacity issues needs to be fully confirmed through the final assessments.

Along the A460 these are expected to be fully mitigated by the Highways England led M54 / M6 / M6 TOLL link road scheme which states that the A460 currently carries around 26,500 vehicles with Heavy Goods Vehicles making up around 10% of these movements. The proposed schemes for the M6/M6 TOLL/M54 link road are predicted to remove between 21,900 and 22,300 of these movements.

Elsewhere on the highway network potential local improvement schemes have been developed that if shown to be needed (following a full TA) and then implemented will make development acceptable in transport terms. It is anticipated that a proportion of the total quantum of the development from the site (which could be in the order of 1.7 million square feet) could be developed out in advance of the completion of the M54/M6/M6 TOLL link road, and this will be confirmed as part of the Transport Assessment accompanying any planning application. The TA will have regard to the potential for traffic generation from ROF Featherstone to be non-co-incident with AM and PM peak hours (e.g. Continental Shift working), for HCV traffic to be routed away from the A460 and for a sustainable travel management regime to be

introduced via a workplace travel plan. All will logically reduce the impact of generated traffic on the A460 until the M54/M6/M6T link is opened.

In conclusion, using the current evidence available, which is considered to be appropriate for the allocation of the site in the SAD, a proportionate amount of detail is presented for both the proposals for the ROF Featherstone site itself and either of the potential access routes, in regard to the issues of interest that have been highlighted. The further detailed analysis of these issues, and any relevant mitigation required will of course form a part of the detailed planning application for the development of the site and the chosen access route.

iii. Are the site-specific development requirements necessary, effective and justified, including flood risk assessment, Environmental Impact Assessment, Transport Assessment and Heritage Assessment, landscaping and woodland protection?

SCC Council Response

Yes, the site specific development requirements have largely been identified mindful of future planning applications expected to come forward on the site and are deemed to be necessary, effective and justified.

The relevant policy context has been developed over a number of years and agreed by relevant stakeholders, to ensure that the policy delivers measures that are necessary to make the development acceptable in planning terms.

Further details relating to the development requirements of the site will emerge with any planning applications, and should therefore be judged on their own merits.

As the commissioning organisation of the OAR, SCC is actively addressing these requirements in a proportionate and considered way, and the OAR for the access road will provide many of the building blocks for the more detailed Transport Assessment and other assessments which will accompany any planning application.

iv. Are the proposed new road access arrangements appropriate, fully justified, effective, viable and deliverable within the plan period, including impact on heritage assets and surrounding Green Belt and appropriate mitigation measures.

SCC Council Response

Yes, as highlighted above the lack of delivery of the ROF Featherstone site to date has identified that unattractive access to the site was the primary barrier to delivery. This in turn impacts on the marketability of the site. (See Viability and Delivery Options Study) [SD 87].

Access improvements to the site are therefore considered to be appropriate and fully justified as an important part of overcoming the development constraints of the site which have been experienced to date. Both access road options 7 and 9 have been identified as being able to fulfil the objectives of providing improved access to the ROF Featherstone site, and their indicative routes are included in the map at Appendix 1.

The ROF Featherstone site is recognised as a Major Employment Site by the Stoke-on-Trent and Staffordshire Local Enterprise Partnership (SSLEP) in its Strategic Economic Plan, reinforcing its importance and value to local economic opportunity. Further to this, the SSLEP have successfully secured a total of £1.5 million of Growth Deal funding for the part funding of an access road, which alongside a private sector funding contribution from the Saint Francis Group and a funding package which is being assembled by public sector partners, will mean that the chosen access road can be delivered on a viable basis. The commitment of local partners in providing part funding for the access road is reinforced by the joint partners statement, which is attached as Appendix 2.

As highlighted in the responses to previous questions, the ROF Featherstone site, including a new access road to serve it can be considered to be appropriate, effective, viable and developable in a phased manner within the plan period. Following the completion of the OAR stage 2 exercise, a preferred route for accessing the ROF Featherstone site will be chosen based on the evidence and facts available.

The delivery of the M6/M6(TOLL)/M54 link road will provide essential local mitigation related to the A460 and this is due to begin construction in 2021 [SD106 – SD107b], allowing the full site to be completed by 2028.

Local highway improvements have also been identified and are viable deliverable and affordable.

The potential impact of the scheme and the access arrangements on heritage assets has been set out in the response to the previous question. In accordance with NPPF para 90, local transport infrastructure is not considered inappropriate development in the Green Belt, where it can demonstrate a requirement for a Green Belt location.

Given that ROF Featherstone is fully surrounded by Green Belt and improved access has been demonstrated to be essential to the future delivery of the site, local transport infrastructure is required in this Green Belt location. The Landscape and Visual Impact Report [SD104] confirms that the introduction of employment development on the ROF site and new highways infrastructure along the route of option 7 and option 9 will result in development that is not an uncharacteristic addition to the local landscape, and together with proposed new landscape infrastructure planting, will respect its context.

The need for any further site- specific detailed mitigation, including heritage constraints and opportunities and Green Belt, will be set out in the OAR Stage 2, and will be considered through the planning applications process against policy SAD5,

the policies of the Core Strategy, including Core Policy C7; and any other material considerations including national policy.

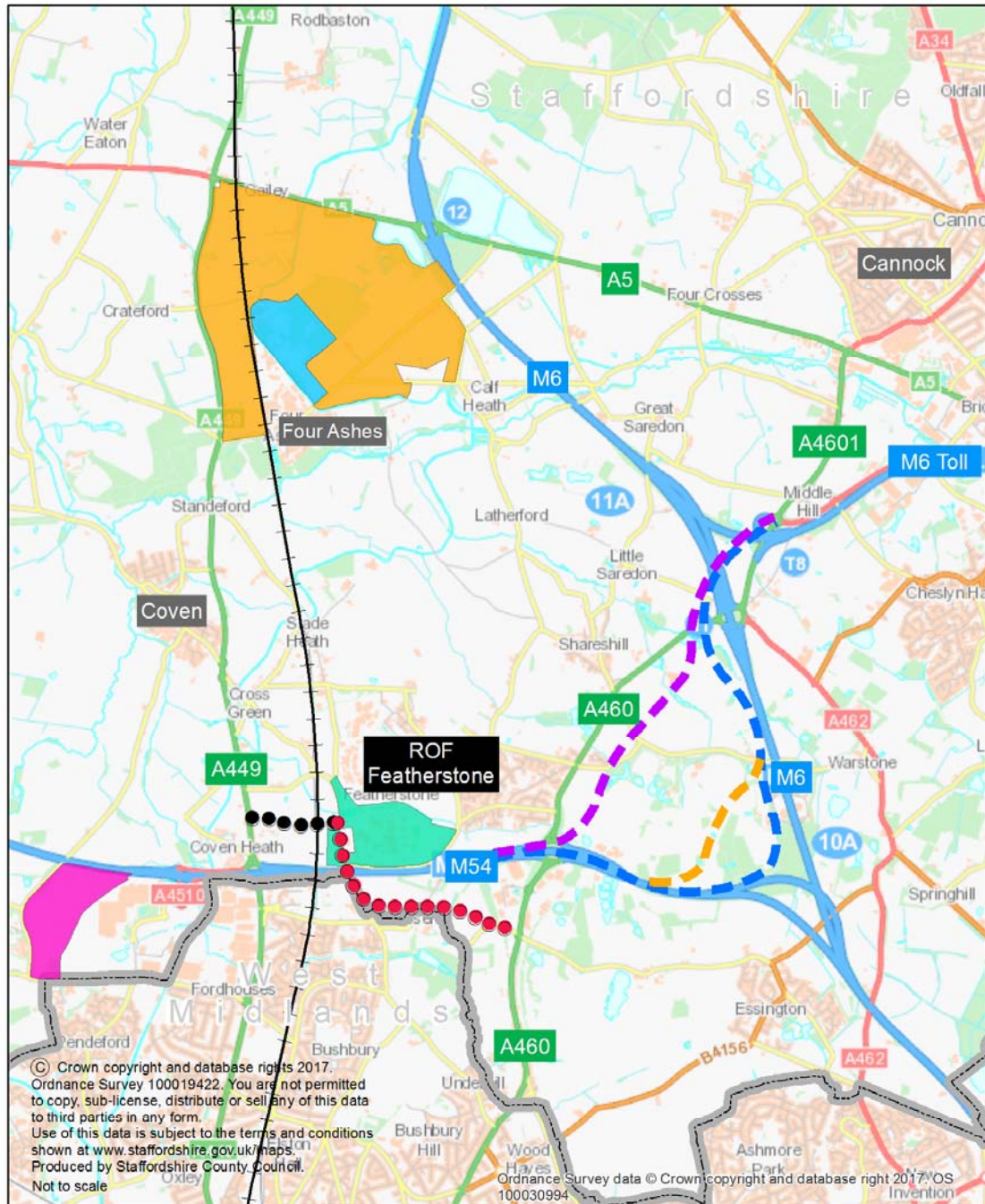
It is therefore considered that evidence submitted is sufficient, robust and appropriate to support an in principle allocation of extensions to ROF Featherstone and support for the identified access options. Work to set out a final detailed scheme for the ROF Featherstone access road is currently underway in the form of the OAR Stage 2 and will be completed once the outcome of the M6/M6(TOLL)/M54 link road is known.

Appendices

Appendix 1 - Strategic Transport Connections and Employment Sites

Appendix 2 - Joint Partners Statement

Appendix 1 - Strategic Transport Connections and Employment Sites



Strategic Transport Connections and Employment Sites

--- County of Staffordshire / West Midlands Boundary

Employment Sites:

- Bericote Four Ashes
- i54 Western Extension
- ROF Featherstone
- Strategic Rail Freight Interchange

Potential Highway Access Options to ROF Site:

- Option 7
- Option 9

M54/M6/M6 Toll Link Road Options:

- Option B West
- Option C East
- Option C West

Mr. Stephen Pratt BA (Hons) MRTPI
c/o Amanda Willis
Programme Officer
South Staffordshire Council
Council Offices
Wolverhampton Road
Codsall, WV8 1PX

1st November 2017

Dear Sir,

Re: South Staffordshire Local Plan, Site Allocations Document Examination

Joint Partners Statement of Support for ROF Featherstone and i54 Western Extension – South Staffordshire Council, Staffordshire County Council and City of Wolverhampton Council

With reference to the forthcoming examination of the Site Allocations Document (SAD) for the South Staffordshire Local Plan we would be grateful for your consideration of this statement which has been prepared jointly by South Staffordshire Council, Staffordshire County Council and the City of Wolverhampton Council.

You will be aware of the former ROF Featherstone and i54 South Staffordshire employment sites, to which modest extensions are proposed within the SAD. These extension sites are being proposed through the SAD to serve the identified needs of the Black Country in providing quality employment opportunities over the South Staffordshire Local Plan period to 2028.

As a partnership, South Staffordshire Council, Staffordshire County Council and the City of Wolverhampton Council have a strong track record of working together to promote and deliver strategically important employment sites.

Between them, the joint partners invested £38 million to fund the infrastructure required to successfully open up the 97 hectare (239 acres) i54 South Staffordshire business park. This included the remodelling of M54 junction 2 to create the country's first ever solely council funded motorway junction, providing direct grade separated access to the i54 South Staffordshire site, and other local access and transport improvements.

The i54 South Staffordshire site has already attracted 2400 jobs with currently over



50% of these employees living within a 10mile radius, and is expected to be home to more than 4,600 jobs when fully occupied by end users. At the time of writing some 90% of the i54 site is built out or committed for development, demonstrating the strong market interest for end users in this wider location.

The strength and success of the partnership has been recognised nationally, with the project winning the Municipal Journal's Award for Community Investment in 2013. (Further information relating to this award can be provided if required).

As joint partners, the momentum of this investment is being continued through the i54/ Junction 2 Steering Group which includes officers from all three organisations, considering all issues relating to the planning, physical development, marketing and skills requirements of the strategic development sites located within the M54 corridor.

ROF Featherstone

Building on the strong track record of success, the local partners intend to adopt a similar model to support the development of the former ROF Featherstone and i54 Western Extension sites.

Challenging access arrangements, and the significant costs of the remediation of the former ROF Featherstone site have been key factors in its delivery being delayed to date. Following the Saint Francis Group's acquisition of the site, local partners have undertaken a significant amount of technical work to underpin the delivery of the site which will require efficient access to the strategic and trunk road network to be marketable for potential end users.

Staffordshire County Council has taken the lead in investigating how public sector support could overcome some of the abnormal costs associated with accessing the ROF Featherstone site to ensure its deliverability within the Local Plan period.

To date, Staffordshire County Council has demonstrated strong support for the delivery of the access road, committing around £800,000 on technical studies and transport modelling work and preparing an Options Assessment Report (OAR) which considers the various potential road access options to the former ROF Featherstone site.

The Stage 1 OAR (which forms part of the evidence library for the Local Plan SAD inquiry and was supported by a public consultation exercise) has refined the original set of 9 possible access routes to 2 deliverable access options.

The identification of a 'preferred option' from these 2 deliverable access options will follow on from the completion of the Stage 2 OAR which is currently being prepared, and is expected to report in early 2018, after the Highways England consultation on the M6/M6(TOLL)/M54 link road has concluded, and a government decision about a final route alignment is made. Following a second public consultation exercise, the ROF Featherstone link road preferred option alongside the relevant technical facts of the Stage 2 OAR and a summary of the public consultation will be presented to the relevant approving governance bodies of the partner organisations for their support.

A funding package for the preferred access road is currently being assembled by the developers of the site (St. Francis Group) and the public sector partners South Staffordshire Council, Staffordshire County Council and City of Wolverhampton Council.

As a named priority site within the Stoke-on-Trent and Staffordshire Local Enterprise Partnership's (SSLEP) Strategic Economic Plan, the local partnership has already secured £1.50 million of funding through the SSLEP Local Growth Deal.

As a partnership we will continue to seek all further opportunities for external funding, and are prepared to use prudential borrowing to help fund the costs of delivering the access road, alongside the private sector contribution from St. Francis Group.

Above all, we believe that this statement demonstrates the commitment of the partnership in supporting the need for improved access arrangements to support the viability of the ROF Featherstone site, the technical work underpinning the delivery of these access arrangements, and the commitment to funding the improved access to the site.

i54 Western Extension

Similarly to ROF Featherstone considerable work and financial resource has been invested into i54 Western Extension over the past 2 years including site surveys and investigations, master planning and options appraisals with a target date for submitting a planning application of Q2 2018 following formal adoption of the SAD.

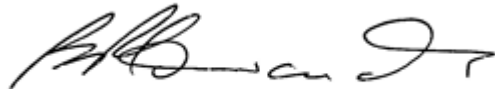
The Partnership with full support from the Stoke-on-Trent and Staffordshire LEP, Black Country LEP, Combined Authority and the Midlands Mayor have developed a funding strategy using a combination of business rates, land receipt and grant. The first works will be the construction of an access road to open up the 40 hectares. These will be undertaken during 2018/2019 with the platform preparation works following on. This would result in much needed employment land of scale with great accessibility being available from 2020 onwards.

The i54 western extension will help to meet Black Country high quality employment land needs. The 40 ha extension is projected to create circa 2,700 jobs in the priority sectors of aerospace, automotive, engineering, innovation and high end manufacturing together with a further 3000 jobs as a result of supply chain and 'spin-off' generated from the inward investment.

Economic growth and targeted growth within the sectors prioritised by the Black Country Strategic Economic Plan over the next twenty years will generate demand for new development based on the evidence and strength of the clusters and their importance to the sub-regional and national economy. To meet that demand, particularly for high end manufacturing, there needs to be a ready supply of well-located, serviced sites capable of accommodating a variety of large floor plates and attractive to those who fund such schemes, as money will remain in short supply well into the future and only the best sites will attract investors' funding.

Both the ROF Featherstone and i54 Western Extension sites within South Staffordshire's SAD respond to this demand and the continued support from the Partnership will allow us to build upon the success of i54 and the collaborative approach the authorities are taking to deliver our respective strategic plans.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Brian Edwards', written in a cursive style.

Councillor Brian Edwards, Leader, South Staffordshire Council

A handwritten signature in purple ink, appearing to read 'Philip Atkins', written in a cursive style.

Councillor Philip Atkins, Leader, Staffordshire County Council

A handwritten signature in black ink, appearing to read 'Roger Lawrence', written in a cursive style.

Councillor Roger Lawrence, Leader, City of Wolverhampton Council