

**From:** [Haywood Planning Services](#)  
**To:** [M54 to M6 Link Road](#)  
**Cc:** [Harris, Kelly](#); [e.fox@sstaffs.gov.uk](mailto:e.fox@sstaffs.gov.uk); [Leeder, Alison](#)  
**Subject:** M54/M6 Link Road Deadline 4 - 8 January 2021 Planning Inspectorate.  
**Date:** 06 January 2021 12:31:51  
**Attachments:** [Figure 1 - ROF Map.pdf](#)  
[Figure 2 - i54 Map.pdf](#)  
[Responses to further written questions.docx](#)

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**For the Attn of Louise Evans Case Manager M54 to M6 link road Case Team.**

SSC IP Ref: 20025362

Please find attached the following documents submitted by South Staffordshire Council (SSC) for Deadline 4:

- Responses to further written questions, including maps showing the extent of the 2018 SAD employment allocation for ROF Featherstone and extent of plots with outline permission and unpermitted land to the north of i54.

SSC has been working with the applicant to prepare further revisions to the draft SoCG. The applicant will be submitting the draft SoCG for deadline 4.

Regards

Tom Cannon  
Haywood Planning Services (on behalf of South Staffordshire Council)

Sent from [Mail](#) for Windows 10

Responses to further written questions

### 2.3.7 Compliance with NPSNN

(a) In the draft SoCG with SSC [REP1-059] indicates that SSC considers that the scheme does not reference paragraph 5.33 of the NPSNN, which highlights the need to consider whether biodiversity opportunities have been maximised, including via planning obligations. Could SSC indicate whether it considers biodiversity opportunities have been maximised.

(b) If not, what additional measures need to be included?

SSC and SCC concerns were set out in an email to the applicant's representative AECOM (by email, 18<sup>th</sup> Dec 2020):

*Habitat currently stands at c.2% net gain at present for the scheme, while linear habitats exceed 10%. DEFRA agencies now are asking for 10% net gain overall, which SCC consider is reasonable and in line with the emerging Environment Act. Does HE agree with this, and if not why?*

*Can you clarify the relationship between the project that Emily Major is leading, which is called M54 to M6 link road Biodiversity Net Gain strategy feasibility study and any off-site net gain that might be needed as a result of the Hearing? For example, if the Inspector finds in favour (partly or entirely) of Allow, I believe the remaining land within the DCO limits will not provide enough space for habitat creation?*

*It is our understanding that the Road Improvement Strategy (RIS) Fund involves a bidding process and is therefore not guaranteed for the purpose of mitigating any losses from the M6 /M54 link. We also have some concern regarding timing as, although RIS2 ends in 2024, it is likely to be over-subscribed by then and there has been no announcement of a RIS3.*

*Our preferred outcome would be to secure funding for any off-site mitigation through a S106 agreement. Is this possible?*

We have not yet received a response to these questions and remain concerned that any off-site mitigation should be secured through planning agreement, rather than be left to bidding into a scheme with no guaranteed outcome. Given the lack of planning obligations to secure off-site improvements and the apparent inability to secure a 10% net gain on-site, South Staffordshire District Council and Staffordshire County Council remain concerned that the limited extent of biodiversity improvements proposed would fail to maximise biodiversity opportunities available.

A list of priority off-site locations in the area around the site have been provided to the applicant's representative previously as part of their Road Improvement Strategy scheme. This work was informed by local Nature Recovery Network mapping prepared by Staffordshire Wildlife Trust and South Staffordshire District Council and was refined in discussion with local stakeholders. Therefore, we consider that commuted sums secured via planning obligations towards these locations could provide additional measures for improving biodiversity up to the 10% net gain advised by DEFRA."

### 2.3.9 Veteran Trees

Could the parties ensure that agreement or otherwise that all veteran trees are identified in the documentation is recorded in the relevant Statements of Common Ground.

SSC is satisfied that the tree survey has collated the relevant baseline information. However, it is noted that some veteran trees have been noted as part of groups and/or woodlands and not as individuals per se. SSC recommend that any groups or woodlands that is identified as having veteran trees within and which may be affected by the proposal should be individually assessed and appropriate management/protection measures identified.

It is also suggested that the site/area of development is cross referenced with information kept on ancient tree forum (ATF), ancient and veteran tree maps, that may further identify any trees which may have been picked up and verified as ancient or veteran by the group.

Finally, following consultation with the SCC Ecologist, SSC requests that over mature and veteran trees are clearly highlighted and identified on site, including in working documents such as the CEMP. This point is to be referred to by SCC in the draft SoCG?

### 2.12.3 ROF Featherstone

Could the precise allocation be identified, that is the quantum, size, use(s) and associated metrics be provided, as well as location on an Ordnance Survey base map.

The ROF Featherstone strategic employment site was most recently allocated for development in Policy SAD5 on page 46 of the 2018 Site Allocations Document (SAD) (<https://www.sstaffs.gov.uk/doc/179829/name/APP2%20SAD%20September%202018%20FINAL.pdf/>).

The SAD allocated the site for 36ha of B1/B2/B8 employment use. Very recently, a planning application has been submitted (but not yet approved or validated) for the entirety of the site (20/01131/OUT), which is a hybrid application seeking full permission for necessary external and internal highways measures and outline permission for the employment uses on the site.

A map showing the extent of the 2018 SAD employment allocation is attached to this response (Figure 1 – ROF Map).

### 2.12.4 i54

Could the precise allocation be identified, that is the quantum, size, use(s) and associated metrics be provided, as well as location on an Ordnance Survey base map.

The majority of the i54 strategic employment site was originally granted planning permission for *“[c]omprehensive redevelopment of land to provide a strategic employment area comprising offices, workspaces, industrial units, education and research, hotel, ancillary services, open space and associated highways, footpaths and landscaping”* in March 2007. The majority of land covered by the original permission is now built out, however the following areas are covered by the original permission but are currently undeveloped:

- Plots D, E & F: 4.82ha remaining with outline permission for B1/B2 use (permission refs. 05/01311/OUT & 13/00349/VAR)

In addition, a more recent extension to the site was allocated for development in Policy SAD5 on page 46 of the 2018 Site Allocations Document (SAD)

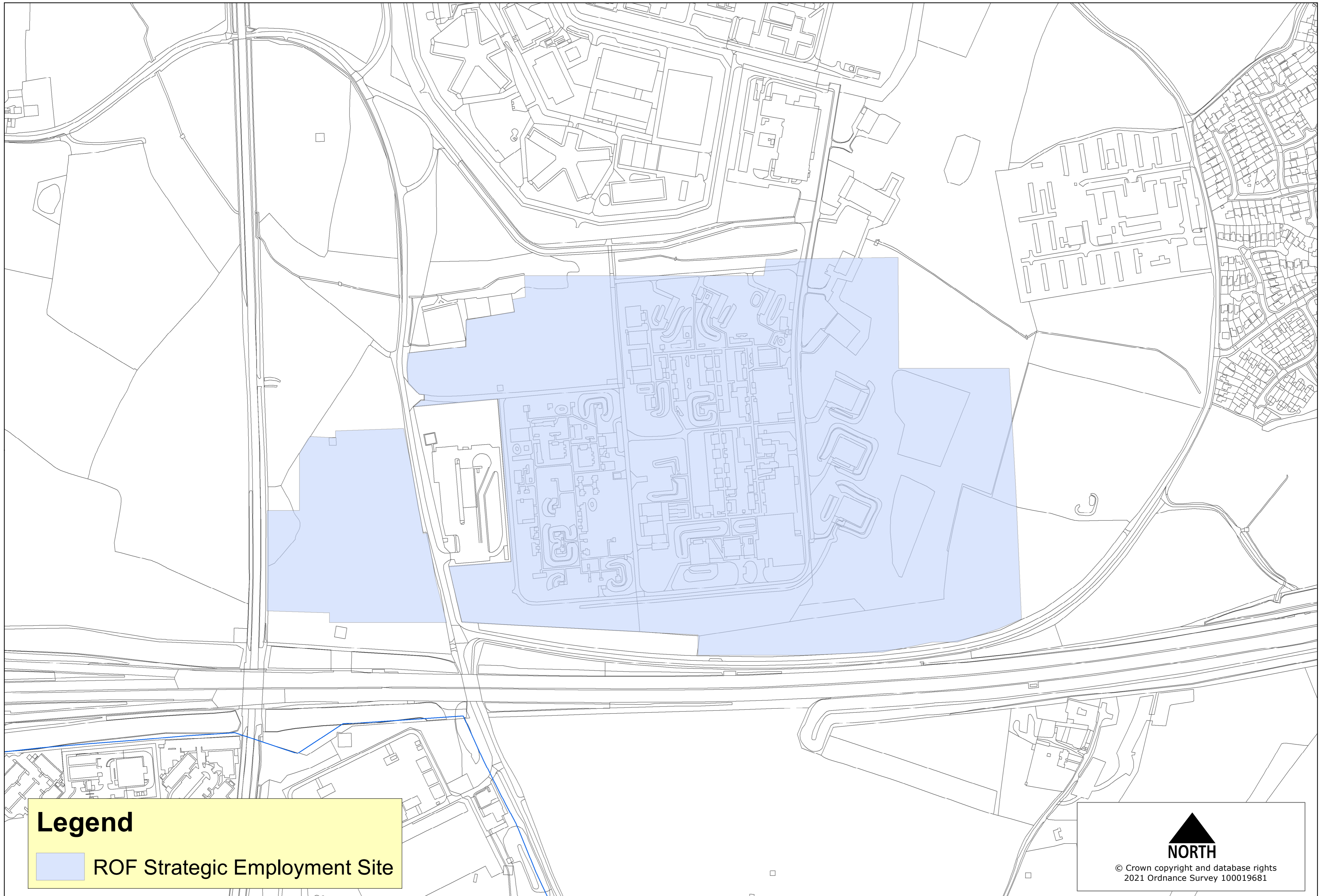
[\(https://www.sstaffs.gov.uk/doc/179829/name/APP2%20SAD%20September%202018%20FINAL.pdf/\)](https://www.sstaffs.gov.uk/doc/179829/name/APP2%20SAD%20September%202018%20FINAL.pdf/).

The SAD allocated around 40ha of additional land to the west of i54, which can be split into two separate elements, which are set out below;

- An existing planning permission for up to 100,000 sqm of B1/B2 floorspace on the southern area of the allocation (permission ref. 18/00637/OUT)
- The remaining northern area of the allocation (approximately 15ha), which is currently without planning permission

A map showing the extent of the existing plots D, E & F, the recent outline permission and the unpermitted land to the north is attached to this response (Figure 2 – i54 Map).

Figure 1 -ROF Map



**Legend**

ROF Strategic Employment Site



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Figure 2 - i54 Map

