

From: [Steven Eggleston](#)
To: [M54 to M6 Link Road](#)
Cc: [Andy Plant \(andy.plant@stfrancisgroup.com\)](mailto:andy.plant@stfrancisgroup.com)
Subject: M54 to M6 Link Road - Reference 20025377
Date: 23 November 2020 18:45:03
Attachments: [image003.png](#)

Fao Programme Officer

We act for St Francis Group in relation to the above and our reference number is 20025377.

Progress on Draft Statement of Common Ground: St Francis Group/Highways England

We are in the process of agreeing a statement of common ground with Highways England. Unfortunately process and approvals have meant that we are unable to achieve the D3 deadline of the 24/11/2020; we believe the next deadline is achievable on the 8/1/2020 from our side. We are in agreement on most of the points and wish to advise you of this, at this point in the Examination Process. Our position, which will be reflected in the Statement of Common Ground, will be as set out below.

1. **SFG wishes to express overall support for the M54-M6 Improvement Scheme (the Scheme) which will increase the overall attractiveness of the ROF Featherstone site by providing enhanced strategic access from the motorway network.**
2. **The ROF Featherstone site is allocated in South Staffordshire Council's (SSC) 2018 Site Allocations Document as a key employment development that will deliver a significant level of jobs in an employment cluster, that includes the i54 site, of Strategic significance.**
3. **St Francis Group recognises that HE followed the appropriate guidance and considered the development to be dependent on the Scheme based upon advice provided to them, through the evidence gathering process, by South Staffordshire DC. The advice provided by SSC was incorrect. St Francis Group was not aware of these requests.**
4. **Notwithstanding this, St Francis Group (and we understand HE) consider that including the ROF development in the Scheme traffic model would not materially affect the design or appraisal of the Scheme.**
5. **SFG consider that the ROF Featherstone site is not 'dependent' on the delivery of the link road project (the Scheme) and can proceed without it.**
6. **At the time when the ROF Site Allocation was extended and adopted the M54/M6 Link Road was a possibility with no preferred solution but by no means a certainty; hence the fact there is no reference to it being necessary in the Site Allocations Document adopted in September 2018 Policy SAD 5**
7. **The ROF site will add some traffic to the A460 albeit the access Route 7 minimises this. The 'test' for whether this traffic can be accommodated is whether it will have a severe impact as noted by the Framework. This is not simply whether the existing network is at capacity. Any assessment of such impacts would also consider whether there are ways of mitigating any impacts eg through specific highway improvement schemes at individual locations. These matters will be addressed in the TA which will accompany the planning application for ROF. The impacts on A460 will be considered by the Local Highway Authority, Staffordshire County Council.**
8. **If, for whatever reason, the Scheme is not delivered then St Francis Group will remain committed to the delivery of the ROF strategic development.**
9. **Whilst SFG accepts that any impacts identified arising from the proposed ROF strategic development on**

the M54 J2 as it is today would need to be mitigated, SFG's only concern in relation to the proposed Link Road Scheme is that it cannot afford to have to mitigate over and above this as a result of the M54 Link Road scheme imposing costs or capacity restrictions at M54 Junction 2 .

We would appreciate your acknowledgement of the receipt of this email.



Steven Eggleston
Partner
for i-Transport LLP

E: steven.eggleston@i-transport.co.uk

W: www.i-transport.co.uk

Manchester Office: Centurion House, 129 Deansgate,
Manchester, M3 3WR
T: 0161 830 2172

M: [REDACTED]

Leeds Office: Park House, Park Square West [REDACTED] PW
T: 0113 357 1360

M: [REDACTED]

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