Dear Sir/Madam

Thank you for consulting South Staffordshire Council on your ROF Featherstone highways consultation.

As you are aware, ROF Featherstone is identified as one of our strategic employment sites in our adopted Core Strategy, but despite this, has failed to come forward for employment use. Accessibility to the site has been identified as the key constraint preventing the site from being developed, and therefore we strongly support your continued work to identify a suitable access solution.

This work, along with our proposals to extend ROF Featherstone through our Site Allocation Document is essential to enable the site to attract inward investment, see new jobs created, and enable ROF Featherstone to fulfil its potential. We therefore look forward to our continued partnership working on delivering this longstanding employment site.

Yours faithfully

Andrew Johnson

Director of Planning and Strategic Services

Strategic Management Team
South Staffordshire Council

Tel: 01902 696457

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Dear Sirs

I am writing regarding the consultation Staffordshire County Council is currently running on the Royal Ordnance Factory link road proposals.

I have been contacted by numerous constituents who strongly oppose Option 9 which would include constructing a new road from Cat and Kittens Lane to the A460 Cannock Road. I very much share my constituents’ opposition to such a scheme.

The option would mean that the new road would cross Green Belt land running between Moseley Old Hall, a Grade II listed building owned by the National Trust and the nearby Moseley Hall. The area is of significant historical interest and it is important that such areas are protected from the type of development that is being considered. Similarly, if Option 9 was chosen there would be severe damage to the environment and local wildlife habitats.

If Option 9 is taken forward it would have a severe impact on the lives of my constituents who live in Bushbury and Moseley areas. The options that link to the A449 Stafford Road, a dual carriageway and one of the main arterial routes in the area makes much more sense and I would hope that objections to option 9 will be given serious consideration before a final decision is made.

Yours faithfully,

Emma Reynolds MP
7 February 2017

Councillor Mark Winnington
ROF Featherstone Consultation
Staffordshire County Council
Staffordshire Place 2
Stafford
ST16 2DH

Dear Councillor Winnington,

ROF Featherstone Highways Consultation

The City of Wolverhampton Council (CWC) understands the need to provide new employment opportunities and fully supports the proposals to develop the former ROF Featherstone site. However, the existing local road network in Wolverhampton does not have the capacity to accommodate a development of the proposed scale of the former ROF Featherstone site without significant highways mitigation. Recognising that access to the site is a serious constraint, CWC have worked closely with Staffordshire County Council and its delivery partner Amey to help inform the options appraisal which is the subject of this public consultation.

CWC would like to see a solution which provides convenient and direct access for the site to and from the existing strategic highway network in all directions, without negative impact upon Wolverhampton residents. It is also important that essential infrastructure and facilities are provided to allow future employees from within the Wolverhampton area to walk, cycle and use public transport to make their journeys to the site. Of the options presented, option 7 provides the most direct vehicle access to the existing highway network, and would therefore be the preferred option to be taken forward for more detailed consideration.

The consultation details provided conclude that option 7 should be progressed. The option to construct a new road between Cat and Kittens Lane and the A460 (option 9) also appears to be preferred by Staffordshire County Council at this point. Option 9 is likely to have a significant negative impact upon the City of Wolverhampton and its residents and it is not supported by CWC at this time.

All the options under consideration are likely to result in considerable development impacts still being experienced within the City of Wolverhampton. Noise, air quality, speed of traffic, HGV routeing, road safety and issues of rat running will all need to be considered, and we would expect appropriate mitigation to be identified and implemented prior to any development of the former ROF site.

Yours faithfully,

Steve Evans
Cabinet Member for City Environment
Response to ROF Featherstone Highways Consultation Document
1. Response to the consultation questionnaire

1.1 The National Trust is a charity founded in 1895. Our statutory purpose, set out in the National Trust Acts, is to promote the permanent preservation of places of historic interest and natural beauty for the benefit of the nation. Although independent of government, we have been given the unique ability to declare our property inalienable, meaning that it cannot be sold and that it will be protected for ever, for everyone. With other 4.5 million members we are the largest environmental organisation in Europe. Our protective ownership in the vicinity of the study area comprises Moseley Old Hall, its outbuildings, garden and adjoining land. The Hall was given to us in 1962 with money to support its conservation being raised by public subscription.

The Trust does not wish to respond to the consultation questions other than question 3, with our comments relating to option 9.

In response to question 3, it is our view that the stated disadvantages of Option 9 do not adequately reflect the issues in relation to Moseley Old Hall and the surrounding landscape and that the disadvantages of option 9 are such that it should not be pursued further. Our detailed comments are summarised below and set out further in section 3 of this document. We have separately commented on the information made available during the consultation process.

1.2 Option 9 would cut through the remains of the agricultural landscape of fields, narrow lanes and footpath that are a key part of the setting and story of Moseley Old Hall, which hid King Charles II from danger in 1651. It would permanently sever its links with Northycote Farm, its nearest surviving neighbour for the last 400 years, and the communities tied to it.

1.3 This option would also sever and contract the already small amount of green space available to people living on the edge of Wolverhampton.
2.0 The Options:

Figure 1: Consultation Map showing Route of Option 2
Figure 2: Consultation Map showing Route of Options 3-9
### Figure 3: Consultation Summary of Route Options

<table>
<thead>
<tr>
<th>Option 1</th>
<th>Option 2</th>
<th>Option 3</th>
<th>Option 4</th>
<th>Option 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do Nothing</td>
<td>Do the minimum</td>
<td>Construct a new connection from Brookhouse Lane to A460 Cannock Road</td>
<td>Construct a new road from Brookhouse Lane to the M54 junction 1 off-slip road.</td>
<td>Construct a new connection from New Road to East Road, including the upgrade of East Road</td>
</tr>
<tr>
<td>No amendments to the existing road network. All vehicles including HGVs would continue to use existing routes.</td>
<td>Improvements to several existing junctions to increase road capacity. All vehicles including HGVs will continue to use the existing road network.</td>
<td>With a junction prioritising traffic on A460 Cannock Road. This would provide access to the development site and a direct connection onto A460 Cannock Road.</td>
<td>This option has been assessed and does not meet Highways design standards.</td>
<td>All vehicles including HGVs would access the ROF Featherstone site via: Cat and Kittens Lane, Brookhouse Lane, East Road and New Road.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Option 6</th>
<th>Option 7</th>
<th>Option 8</th>
<th>Option 9</th>
</tr>
</thead>
<tbody>
<tr>
<td>Upgrade the existing underpass at Brinsford Lane with additional improvements to Brinsford Lane.</td>
<td>Construct a new road from Cat and Kittens Lane to A449 Stafford Road with a new bridge over the West Coast Main Line railway.</td>
<td>A new junction would be built on the A449 Stafford Road, allowing access to the ROF Featherstone site from all directions.</td>
<td>Construct a new road from Cat and Kittens Lane to A460 Cannock Road. Including a new roundabout linking Cat Kittens Lane to the new road.</td>
</tr>
<tr>
<td>Widen the bridge on Brinsford Lane, under the West Coast Main Line to allow HGV use, including improvements to Brinsford Lane and Cat and Kittens Lane. A new junction at Brinsford Lane/A449 Stafford Road would be built.</td>
<td>A junction would be built on the A449 Stafford Road, allowing access to the ROF Featherstone site from all directions.</td>
<td>A new connection from Cat and Kittens Lane to the A449 Stafford Road would provide access to the site. This would include the development of a new bridge over the West Coast Main Line. A new junction would be built on the A449 Stafford Road, allowing access to the ROF Featherstone site from all directions.</td>
<td></td>
</tr>
</tbody>
</table>

### Figure 4: Consultation Description and Assessment of Option 9

**Option 9**

**Construct a new road from Cat and Kittens Lane to A460 Cannock Road**

**What are you suggesting?**
This would include constructing a new road from Cat and Kittens Lane to A460 Cannock Road, including a new roundabout linking Cat Kittens Lane to the new road.

**What are the advantages?**
- The ROF Featherstone site could become usable – it could allow development on the site to create jobs and growth.
- Provides an additional route for HGVs.
- A potentially lower cost option.
- Improves footways and cycleways.
- Advice from the local Planning Authority indicates this option is likely to achieve planning consent.

**What are the disadvantages?**
- The new road would cross Green Belt land.
- The road would run between Grade II* listed building Moseley Old Hall and Grade II listed building Moseley Hall.
Figure 5: Map showing Option 9 and issues related to Moseley Old Hall and the surrounding locality.
3.0 Response to Consultation Document’s “What are the disadvantages [of Option 9]”

“The new road would cross Green Belt land”

3.1 This bland statement fails to recognise the importance of this area in terms of its inherent importance as an open rural landscape on the edge of Wolverhampton and separating Hilton Cross from the conurbation. Although figures are not given in the consultation document, the maps show that option 9 would require a greater take of green belt land than other options. In addition, the characteristics of the area mean that option 9 would have greater conflict with green belt purposes and the beneficial use of green belt than the other options.

The road would lead to the future pressure for development on either side, leading to further conflict with green belt purposes and the beneficial use of the green belt.

“The road would run between Grade II* listed building Moseley Old Hall and Grade II listed building Moseley Hall.”

3.2 This similar rather bland statement neglects to mention the importance of the heritage settings of these two listed buildings and also fails to mention the proximity of the Grade II listed Moseley Hall Cottage whose curtilage will lie adjacent to the proposed route.

3.3 All three of these buildings and their settings are recognised as being of national importance, and the conservation of both the buildings and their settings is a requirement of National Planning Policy Framework.

3.4 The proposed route slices through the very important area of remnant rural landscape that helps current and future generations understand the historic significance of these buildings and engage with the story of the ‘Royal Escape’. Moseley Old Hall and its surrounding rural landscape feature prominently within this Royal historic event and this area, whilst degraded in many respects from its former rural tranquil character, through its connection with this important historic Royal event can be considered to be a ‘valued’ landscape in NPPF planning terms. The attached Appendix considers the importance of this setting more thoroughly.

3.5 The removal of the narrow lane access to Moseley Old Hall will not only devalue the significance of the setting and the heritage asset itself but also degrade the visitor experience both directly and indirectly.

3.6 The site does have limitations of visitor footfall due to the size of the property and the time to flow through the guided tour. Whilst increasing visitor numbers over more days is planned, the potential increase in visitor numbers on popular days would reduce visitor enjoyment and lead to the site having to consider limiting admissions at certain times – with attendant visitor disappointment. The current narrow access route is beneficial in visitor management terms as it helps self regulate the visitor number to manageable levels.
APPENDIX:

Moseley Old Hall

1.1 The story of Moseley Old Hall is one of journeys.

1.2 The Hall has a key role in one of the most important and historic journeys in British History. King Charles II, in his epic escape from defeat after the Battle of Worcester on the 3rd September 1651, travelled over 600 miles around England to escape to safety in France – before his triumphant return to the throne in 1660.

1.3 Moseley Old Hall is now in the care of the National Trust and the visitor experience is full of journeys. To visit the house, the visitor must journey to and from the house down country lanes; they journey back in time when they are guided on the tour around the house; and, the key story of the Hall is about a very special journey in British history.

1.4 The surrounding remnant rural landscape, the roads, footpaths and bridleways are key to both understanding the story and the wider experience of the visitor.

1.5 The landscape is rural and has changed quite dramatically since 1651 when it would likely have been a much less wooded landscape, with cultivated fields and hedgerows along the lanes and tracks.

1.6 Leaving behind the twenty-first century, the visitor approaches the house, either from the west - turning off the Cat and Kittens Lane into Moseley Road; or, from the M54 junction and the east – the Cannock Road (A460) onto the other end of the narrow and winding Moseley Road. Both approaches then meet and turn northwards along the very narrow Moseley Old Hall Lane up to the Hall itself.

Figure 6: Moseley Old Hall
Figure 7: Route of Charles II’s Escape in 1651
The Royal Escape...

2.1 After the final battle of the English Civil War, the Battle of Worcester on 3rd September 1651, King Charles II escaped and was on the run from Parliamentarians.

2.2 After escaping northwards from Worcester he travelled only with one or two companions, while supporters went ahead, finding the next place he could hide. He tried to find safe shelter in Shropshire and ended up at Boscobel House to the west of Moseley Old Hall. With Parliamentarian soldiers all around and realising he needed to keep moving, the King left Boscobel House for Moseley Old Hall by way of Pendeford Mill, escorted by the male members of the Penderel family.

2.3 He arrived at the back door of Moseley Old Hall in the early morning of the 8th September. He arrived cold and wet, disguised in workman’s clothing and ill-fitting shoes that had made his feet bleed. He was welcomed by Thomas Whitgreave, the owner of the house, Alice Whitgreave, Thomas’s mother, and John Huddleston, the Catholic priest of the house. They gave Charles dry clothes, food, and a proper bed (his first since Worcester on 3 September).

Figure 8: Engraving showing King Charles and the Penderel Brothers travelling to Moseley Old Hall

Figure 9: The Four-poster Bed where Charles II slept at Moseley Old Hall

2.4 Charles was hidden in the priest-hole on the afternoon of the 8th September while a confrontation between Whitgreave and Parliamentarian soldiers took place outside the Hall. He later rested on a four-poster bed in the Hall. His supporters then had the time to formulate a plan - and talk to the Lane family about Charles joining their daughter on her journey to Bristol. She importantly had an official pass for this journey. Bentley Hall was to be the next key destination (the home of the Lane’s, it has been lost to development of the Bentley Bridge Retail Park). He left
Moseley Old Hall two days later, having planned the rest of his escape to the Continent.

2.5 On horseback and escorted by Colonel Lane, the King made the short journey to Bentley Hall, where he could join Jane Lane who had the official permit allowing her to travel to Abbots Leigh, near Bristol which was a major port and it was hoped he would then be able to find safe passage to France.

2.6 He travelled to Bristol and Abbots Leigh but was unable to find a suitable ship in Bristol. He then travelled to the south coast to find a boat to France. He eventually found safe passage from Shoreham after six weeks of travelling and hiding from Parliamentarian soldiers searching for him.

Figure 10: Painting of Charles and Jane Lane that hangs in the Houses of Parliament
The Visitors’ Approach

3.1 The approach to the Hall is along narrow winding rural lanes that help enhance the visitors’ appreciation of the setting of the Hall in a rural location (despite the nearby location of the M54 just to the north of the Hall) with lanes and tracks leading to and from the Hall.

Figure 11: Aerial Map showing Easterly and Westerly Visitor Approaches
Figure 12: General view experienced on approaching along the lanes to the east of the site from the Cannock Road - A460 and M54 junction
Figure 13: General view experienced on approaching along the lanes to the west of the site from Cat and Kittens Lane
Figure 14: General view experienced on approaching the Hall along Moseley Old Hall Lane
Sense of Place...

4.1 The rural location and especially the rural country lane approach to the site is a significant element of the visitor experiencing a ‘sense of place’ for Moseley Old Hall. Whilst the M54 lies just to the north of the site and can be readily heard on most days, the character and length of the ‘rural approach’ mitigates the proximity of the M54 and the built-up areas to the south, east and west of the site.

4.2 The experience of the rural approach also contributes to the heritage significance of this important historic site (nationally recognised as a Grade II* building). Grade II* buildings are particularly important buildings of ‘more than special interest’. 5.5% of all listed buildings are Grade II*. The NPPF and Historic England’s guidance on heritage setting notes that it does not just encompass the area from where a site can be seen, it also includes the area from where it can be ‘experienced’.

4.3 Moseley Old Hall Lane is an important part of the setting of this Grade II* listed site because it is an integral part of the Royal Escape narrative. The King hid from Parliamentarian soldiers who had arrived in the lane searching for Royalists. He saw remnants of his defeated army straggle north along the lane. He then later departed southwards by horse along the lane towards Bentley Hall.
Figure 16: Map showing route of Monarch’s Way (red dotted line)
Importance of Journeys...

5.1 The visitor experience is, therefore, one that is full of journeys. To visit the house, the visitor must journey to and from the house down country lanes – this aids their understanding of the rural location and setting of the house and the rural lanes within the Royal Escape story.

5.2 The story is not about a Hall in a particular place. It is about a Hall being a key stopover on a very important journey. The story includes an arrival from Boscobel House and then a journey onwards to Bentley Hall and eventually, after an eventful further five weeks, safety in France.

5.3 In their comments both to National Trust staff and those left on TripAdvisor show that the experience of journeying to the Hall via “narrow country lanes” is both an important part of the enjoyment of their visit and helps their understanding of the Royal story.

5.4 The importance of journeys means that the surrounding landscape, the roads, footpaths and bridleways are key to both the story and the experience of the visitor.
Dear Sir/Madam

REPRESENTATIONS TO STAFFORDSHIRE COUNTY COUNCIL ON ROF FEATHERSTONE HIGHWAY CONSULTATION ON BEHALF OF PEVERIL SECURITIES AND ST FRANCIS GROUP

This letter constitutes the representations on behalf of Peveril Securities and St Francis Group in relation to Staffordshire County Council's (SCC) initial consultation exercise on the potential routes for a proposed link road between the strategic employment allocation at the Royal Ordnance Factory (ROF) and the M54. Peveril/St Francis control much of the allocated ROF site. Peveril/St Francis would support the SCC's contention that a new link road is required in order to deliver a successful and prestigious employment development at ROF in accordance with South Staffordshire Borough Council’s (SSBC) policy intention in its core strategy and Site Allocations Document. There is a clear case that supports the principle of the road in both technical and marketing terms and further evidence is being prepared by Peveril/St Francis to support the allocation of the ROF site (in an extended form) to the SSBC Site Allocations document.

Peveril/St Francis also agree with SCC’s initial assessment of the route options identified to the effect that most of the chosen options can be eliminated from further consideration. SCC concludes initially that in practice there are only two routes which should be the subject to further more detailed consideration and these are route options 7 and 9. For the reasons set out below it is considered there is a strong case to support route option 9 to the point where a further review of route option 7 may not actually be necessary. Option 7 can be questioned in terms of its deliverability given the need for it to cross (presumably by bridge) the West Coast mainline and the complex negotiations that would be required with Network Rail on matters of principle and detail. SCC’s consultation identifies the disadvantages and uncertainties of this process (which would also doubtless include significant cost). Peveril/St Francis would severely question whether ROF could be delivered on a viable basis in accordance with the Local Plan timescales should option 7 for the road be chosen. Questions also arise about the visual impact of any bridge over the railway.

It is considered that the benefits identified of option 9 are significant and outweigh any adverse impacts. The benefits in summary would be:

1. The provision of a convenient and direct route from ROF using an existing route under the motorway and linking to a new roundabout on Cannock Road close to an existing employment site at Hilton Cross and junction 1 of the M54.

2. The deliverability of the route option over land which is controlled by the same parties who control the majority of the ROF allocation.
3. The directness and simplicity of the route. Direct access to Cat and Kittens Lane can be provided, encouraging traffic to route away from the established residential areas in Featherstone. From here, after passing under the M54 at the existing bridge, a new high capacity junction will provide seamless access to the new road link with this then connecting with A460 at the existing roundabout junction located only c.700m from Junction 1 of M54 motorway. Connections to a wide range of destinations are available from the motorway junction, enhanced by the proposed M54 to M6/M6 (Toll) link road. Traffic, particularly HGVs, will therefore be able to access the site using the main road network, avoiding impacts on less suitable routes.

4. The certainty of known elements of the likely costings of the road not involving third party ownership.

The impacts of the road on route 9 are set out in SCC’s document. They include the fact that the road goes through Green Belt land and the potential impact on the setting of listed buildings including at Moseley Hall, Moseley Old Hall and Moseley Old Hall Cottage. As far as the Green Belt is concerned, the allocation of the ROF site is anticipated in the Core Strategy as there may be very special circumstances to allow development in Green Belt. On the basis that the allocation is promoted by both SCC and SSBC, it is logical to conclude that an appropriate road link that delivers the allocation could also be the subject of a successful very special circumstances case. In this regard route option 9 would (unlike many of the other options considered) cause least harm to the purpose and objectives of the Green Belt, as it runs parallel to the M54 motorway and does not impact severely on the purposes of the Green Belt set out in paragraph 80 of the NPPF. The road would technically be constructed on what is ‘countryside’ but it would not offend other purposes relating to coalescence, the setting of historic towns, preventing the sprawl of urban areas etc. Further evidence on these matters will be submitted to SSBC’s Site Allocations Document.

The initial landscape and visual appraisal of option 9 (a full assessment will be carried out as part of a future Environmental Impact Assessment) takes account of the significant influence that the M54 corridor and other urban influences, such as a number of electricity pylons, already have on the local landscape character of the area. It is considered therefore that the landscape in this location has capacity to accommodate the potential new link road. Due to a combination of mature vegetation (including woodland blocks and high hedgerows), the local topography and the limited number of sensitive visual receptors in this location, as well as the influence of the existing transport and urban infrastructure has on views across the area, potential visual impacts are considered to be limited. There is also opportunity to introduce landscape mitigation measures in order to reduce any potential impacts.

As far as the effect on the heritage assets are concerned, a further detailed evaluation of this issue will be submitted in conjunction with the SSBC Site Allocations Document consultation. However, the approach that will be adopted will follow that set out in paragraph 134 of the NPPF. It will be contended that less than substantial harm would be caused to designated heritage assets. Listed buildings would not be physically affected by the road, the argument relates to the setting. Paragraph 134 requires the harm caused to the heritage assets to be balanced against the public benefits of the link road following the option 9 route.

Balanced against the limited harm are significant public benefits related to the key role the road would play in delivering a strategic employment site with substantial economic benefits and the use of brownfield land.

In summary, therefore, Peveril/St Francis consider that option 9 is the most preferable route for the link road and agree with both SCC and SSBC that such a road is required to serve the ROF site in its extended form. This will enable significant economic benefits to be delivered to the area with a level of harm that is substantially outweighed by the benefits the road on route 9 will bring about on the
ROF site. Peveril/St Francis would be willing to participate in future consultation exercises on the route options.

Yours faithfully
for WYG

SIMON CHADWICK
Director