

M54/M6 Link Road

Written Representation

Prepared by

Staffordshire County Council



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Staffordshire County Council has been in consultation with Highways England (HE) over the proposed scheme for a lengthy period and have provided detailed responses to the statutory Pre-Application consultations.

We have maintained throughout the pre-application stage that we are supportive of the proposal in principle and would wish to see it achieve its stated objectives to the greatest effect, whilst minimising any negative impacts. Whilst HE have engaged positively throughout we still have some concerns and issues to address. To assist the Examination presented below are details of areas of concern and/or matters outstanding for the County Council.

A460

Since a final option was determined for the route of the new link road we have been clear that we would wish to ensure that the correct conditions are provided so that the existing A460 could be returned to a local road. Indeed, this was the picture presented by HE to local communities during the public engagement events, where the potential for legacy funding schemes to further enhance the A460 post DCO were explained. Communities may therefore be expecting significant complimentary improvements to the A460 to reduce severance and promote walking and cycling post-scheme i.e. giving the old A460 more of a place function than the current movement function. The presence of significant numbers of HGVs would make delivery of such measures much more restricted.

Whilst the new link road will remove the vast majority of long-distance traffic from the A460 we content that there are two scenarios whereby there could be residual or re-routing HCV traffic using the A460 as a through route between the M54 and M6. This will result in a higher proportion of traffic on the old route consisting of larger vehicles that not only affect severance and make the corridor less attractive for sustainable travel modes, such as walking and cycling, but also may reduce the options for providing future interventions post-scheme to improve the environment along the A460 for communities. The continued use of the A460 by HCV's also reduces the effectiveness of the development in achieving its stated objectives.

The two scenarios we believe may diminish the effectiveness of the scheme in delivering its objectives without further reinforcement are detailed below:

1. In relation to residual HCV traffic - The A460 houses, to its northern end, the M6 Diesel filling station for HCVs, which has been used by truck drivers passing by on their route between the M54 and M6. We argue that as human beings are creatures of habit many drivers who have used this facility in the past will continue to do so using the same route as they have always used. Equally whilst the new link may offer a slightly quicker journey time but instinctively drivers may continue to choose the shorter route over heading past their destination to then come back on themselves. In short we believe

that without restriction/complimentary measures there will be continued use of the A460 daily by HCV through traffic when re-fuelling at M6 Diesel.

2. In relation to re-routing traffic the concern here is centred around incidents/closures on the new link road. During such periods the signed diversion will be the A5/A449 between M54 jct 2 and M6 Jct 11. We do not believe traffic will use this route and instead revert back to the A460 to bypass the incident/closure. The A449/A5 is presently the signed route to connect from the M54 to M6 north but drivers are using the A460 instead hence the need for the proposed development. We recognise that during periods of incident there may be little that can be done in relation to light vehicles re-routing onto the A460 however measures could be introduced to keep HCV's off the local road in such circumstances.

In order to reduce the number of HCVs using the A460 to move between the M54 and M6, whilst still allowing access to the M6 Diesel filling station from the north via M6 Junction 11, Traffic Regulation Orders could be considered in the form of 7.5t weight restrictions on the A460. These would allow access to local facilities and routes as necessary but would prevent the A460 from being used as a through route by HCVs. We understand from HE that use of the new link road to/from M6 junction 11 to access M6 Diesel is quicker in terms of journey time than utilising the A460. Therefore, the TRO supports what should be route of choice.

It is our position that such an Order should form an integral part of the scheme in helping it achieve its stated objectives; to be clear a TRO is not considered as mitigation for the development itself but part of the overall scheme. The powers conveyed by the DCO would ensure that there is clarity to local communities about the make-up of the scheme and their expectations for the future of the A460 once it is returned to providing for local traffic. We want to ensure that the new link road is used by all appropriate traffic and in doing so provides the appropriate conditions for wider future options for the A460 and local communities to benefit from reduced traffic pressures. At present the scheme is lacking in this respect.

HE has proposed a Monitor and Manage approach to the issues raised above, which we have considered but have concluded they would be an inefficient response and potentially would require retrospective changes to signage implemented during the construction of the link road. The development of the road itself proves enough that traffic will not use the A5/ A449 trunk road route to connect between motorways if the link road is closed/obstructed. A restriction is therefore essential to ensure HCV traffic stays on the more appropriate strategic route. In addition, dealing with the issues through the DCO provides clarity and certainty to the community and business what is to happen and how it relates to the overall scheme objectives. This will create the appropriate conditions for the A460 to become and feel more like a local village road.

The details of a weight restriction and its coverage should form part of the discussion at the Examination and ideally be agreed by Highways England and Staffordshire County Council.

Reclassification and review of A460

HE are requesting the new link road be named the A460 to maintain consistency in signing. This is acceptable to SCC however this will require the existing A460 to be reclassified upon completion of the new link. This would identify the new link as the main strategic connection as well as allowing consideration of wider legacy schemes on the existing A460. The county council consider that the A460 should be reclassified as a classified unnumbered road i.e. 'c-road' in accordance with the DfT Guidance¹ on road classification and the primary route network, which defines such routes as:

- *classified unnumbered – smaller roads intended to connect together unclassified roads with A and B roads, and often linking a housing estate or a village to the rest of the network. Similar to 'minor roads' on an Ordnance Survey map and sometimes known unofficially as C roads.*

This would enable consideration of a weight restriction to reinforce usage of the new link road by HGVs in line with current county council policies on the introduction of environmental weight limits. Highways England has agreed to make the A460 a lower order road and this is shown on the Classification of Roads Plans, however the process for how this will come into place in the DCO is unclear. The DCO and should make it clear that upon completion of the link road the old A460 will automatically become a classified unnumbered road and recorded as such with the DfT.

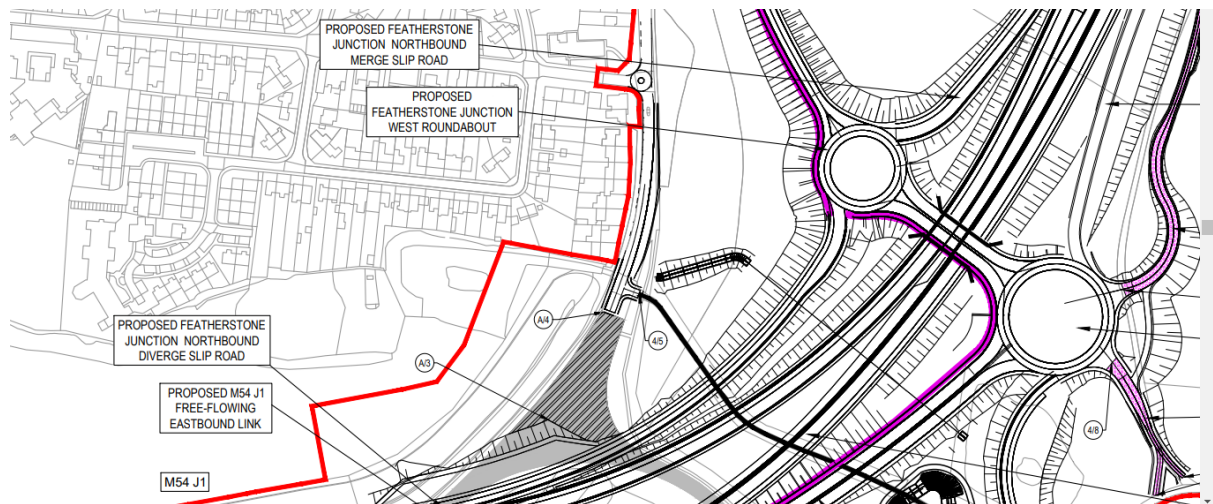
The reduction in status of the A460 would also require review of various Traffic Regulation Orders that apply to the route or require new Orders to be implemented. Whilst it is understood that speed limit changes will be implemented along the A460 once the link road is complete, it is suggested that Highways England also include a review of laybys, parking and weight restrictions in the area. The cost of this review, new orders and associated signing requirements is considered small in terms of the overall scheme cost.

As a result of the realignment of the old A460 there are areas of the original route that are proposed to be stopped up or the carriageway removed as indicated on STREETS, RIGHTS OF WAY AND ACCESS PLANS REGULATION 5(2)(K) SHEET 4 OF 10 . There are two issues here that require further work from HE:

1. Southern section

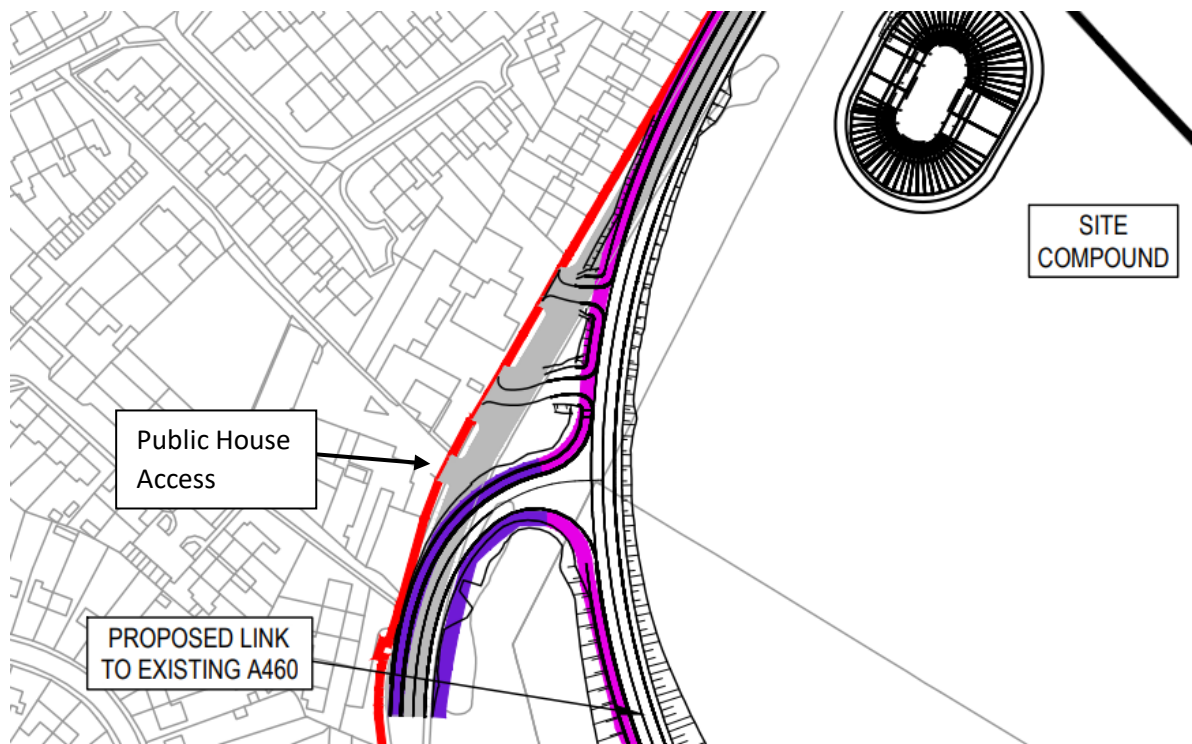
In relation to the southern section of the original alignment that is proposed to become a cul-de-sac as shown on the extract below. There are concerns that given its proximity to the strategic road network this area may become subject to indiscriminate parking. Further measures are considered to be required here to ensure its use is only for residential access and highways maintenance activities.

¹ <https://www.gov.uk/government/publications/guidance-on-road-classification-and-the-primary-route-network/guidance-on-road-classification-and-the-primary-route-network>



2. The area fronting the Petrol filling Station and Public house

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The area shaded grey in the extract above identifies the length of the A460's original alignment that HE proposes to remove the carriageway but retain the area as public highway. Our understanding is the rationale for this is down to the presence of utilities in the highway and the cost of diversion. We have several issues with this approach and the uncertainty created. Starting with the access to the public house as annotated above. The pub seems to have two access points to its car park whilst the southern access is broadly unaffected the northern access appears to be made redundant by the proposal but the property would still front publicly adopted highway at this location.

The scheme proposed two new access drives to the Petrol filling station and surrounding uses from the realigned road. The southernmost access drive crosses an area of land shaded white (or unshaded), this land is to be permanently acquired by HE to deliver the scheme. Effectively, as this land is not part of the highway the access drive therefore crosses third party between the new road alignment and the old alignment. Where the access drive sits above the old alignment of the A460 it will be subject to all legislation covering the adopted public highway and would be subject to maintenance at public expense. Similar issues exist for the northern access.

In addition the old A460 alignment as public highway would be usable by the public, which may create confusion for frontage owners.

There is no clarity on what is proposed for the area between the new highway and old alignment or who will be responsible for it. Further on the ground it will be difficult to define areas that are public highway from areas that are in other ownership. We believe the old alignment of the A460 shaded grey in the extract should be formally stopped up and consideration given to how the land between the rear of the new highway alignment and private properties should be treated including access rights and ownership responsibilities.

A41/Wrottesley Park Road/Heath House Lane junction, Perton

Highways England has identified that additional traffic will utilise this junction upon completion of the M54-M6 link road although the level of this impact is not quantified. The junction has a history of traffic capacity issues in peak hours. Recent work has been undertaken to develop a scheme capable of accommodating additional traffic from new developments proposed during the adopted Local Plan period. Both the existing junction and the proposed improvement scheme have little, if any, spare capacity for additional traffic. The county council would like Highways England to identify peak hour traffic increases associated their scheme and undertake junction capacity assessments as appropriate to understand if the existing and proposed junction layouts can accommodate the additional traffic induced by their scheme. South Staffordshire Council are preparing the next Local Plan and are considering further development in this area.

A5 west of Tamworth

The A5 west of Tamworth is identified as experiencing an increase in traffic as a result of the scheme, although the level of impact at peak times has not been quantified. This section of the A5 is located close to the already heavily congested M42 junction 10. The county council would like Highways England to consider the peak hour traffic increases on the A5 and, if necessary, undertake a junction assessment at M42 junction 10 to determine if the effects on capacity are negative. A future Highways England intervention scheme may need to be developed to

mitigate the effects of existing and additional traffic pressures on the M42 junction 10.

A4601 and A460 between A5 and M6 J11

The Highways England modelling work has identified significant increases in daily vehicle flow on the A4601 and A460 between the A5 and M6 junction 11. These are very likely to have negative effects on the local road network which may require mitigation measures and improvements. The county council would therefore request that Highways England assess whether local improvements in this vicinity are required to maintain the current level of service on both the A4601 and A460 and consider their inclusion in future investment programmes.

Churchbridge Interchange

A460 Lodge Lane Link, Cannock

According to the Highways England modelling work, the A460 Lodge Lane Link experiences a significant increase in daily traffic but this increase does not match the traffic figures identified for the Churchbridge interchange at Cannock. The Churchbridge interchange is very sensitive to increases in traffic and the increases reported on Lodge Lane Link have a negative impact on vehicle flows and delays at this location. The county council would like Highways England to investigate these issues and has raised this as an issue with them in ongoing discussions, we are currently awaiting a full response. The county council considers that it may be most appropriate for Highways England to specifically identify appropriate mitigation measures for inclusion in their future infrastructure investment programmes.

A460 West of Cannock

Increased traffic pressures have been identified on the A460 west of Cannock by the Highways England modelling work. This section of the A460 will also serve the MacArthur Glen retail outlet at Cannock which is predicted to attract significant road traffic, putting further pressure on the A460. It is considered likely that the combination of the link road and the retail development traffic will have a negative impact on the capacity of the A460 and lead to vehicle delays and unreliable journey times. The county council would therefore request that Highways England undertake assessment work to understand these impacts and if necessary develop mitigation measures to alleviate traffic capacity issues at this location for inclusion in future investment programmes.

Hilton Lane

The Highways England modelling work has identified significant increases in daily traffic on Hilton Lane, as well as smaller increases at Shareshill. It is considered that this may have significant negative effects on the operation of the local highway network and lead to queues and delays on local roads and at junctions. Further assessment could be made by Highways England regarding these impacts and potential mitigation measures could be developed for delivery as part of a suite of legacy schemes along the A460 corridor.

