

Project	M6 Diesel site at Saredon & M54-M6 link road		
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1 INTRODUCTION

- 1.1 The M54-M6 link road scheme, if granted development consent, would provide a high-quality dual carriageway between the M54 at J1 and the M6 at J11. This would effectively bypass the existing A460 that runs between these two junctions, on which the M6 Diesel Saredon Filling Station is situated. The scheme is being promoted by Highways England who are the Applicant.
- 1.2 BWB, on behalf of M6 Diesel, have submitted a Relevant Representation [RR-012] which raised three specific concerns, one of which is now resolved with the Applicant and hence not considered further. The resolution of the first point (which related to traffic modelling) is confirmed as being agreed in the draft Statement of Common Ground which will be submitted by the Applicant.
- 1.3 The outstanding concerns form the basis of our Written Representation which is set out below. This document contains 1,477 words and hence no separate summary is provided.

2 TRAFFIC DEMAND

- 2.1 The M6 Diesel site serves a significant number of HGVs per day. We obtained traffic data in October 2019, please see our response to Question 1.10.6. The key data is repeated here for ease of reference.
- 2.2 570 HGVs were surveyed using the site and the ANPR data shows that, within the 24-hour period:
 - 104 of 570 HGVs (18%) came from the direction of the M54 and continued in the direction of the M6;
 - 167 of the 570 HGVs (29%) came from the direction of the M6 and continued in the direction of the M54;
 - 62 of the 570 HGVs (11%) came from the direction of the M54 and exited in the direction of the M54; and
 - 237 of the 570 HGVs (42%) came from the direction of the M6 and exited in the direction of the M6.

3 DEVELOPMENT CONSENT ORDER

- 3.1 As set out in our relevant representation, we do not agree with the wording of Article 16 in the draft DCO [AS-075]. The powers, as drafted, could be used to implement a variety of permanent traffic regulations, including restrictions on HGVs.
- 3.2 Our view is that any permanent changes to traffic regulation in the DCO should be clearly justified and should only be included as either a direct consequence of the scheme or in mitigation of an adverse impact of the scheme. However, this is not the case as the Applicant's reasons for including these powers, found at paragraph 5.50 of the explanatory memorandum [AS-077], are "so

that [the Applicant] can implement traffic management measures ... necessary to construct the authorised development". (Our emphasis).

- 3.3 There is a clear discrepancy between the reasons for which the traffic regulation powers are being sought and the powers themselves: permanent powers are being sought on the basis of a temporary condition.
- 3.4 The powers as drafted could be used to implement a permanent restriction on HGVs on the existing A460 which could be of significant detriment to M6 Diesel's business.
- 3.5 The Applicant has not identified, either as a direct consequence of the scheme or as mitigation of an adverse impact, that a restriction on HGVs using the existing A460 is required. Further, we understand that the Applicant is not proposing such a restriction. Hence we consider that the powers sought are disproportionate.
- 3.6 Therefore, we request that the wording of the draft DCO be amended so that these powers can only be used for the purposes of construction of the scheme (i.e. in line with the reasons given in the Explanatory Memorandum).
- 3.7 In due course, if the local highway authority were to consider that HGV restriction were appropriate for the repurposed existing A460, they are at liberty to make their own proposals using normal traffic regulation orders and consult with affected parties as required.

4 SIGNAGE TO M6 DIESEL

- 4.1 The Applicant has not properly assessed the numbers of vehicles using the M6 Diesel site. Paragraph 4.6.6 of the Transport Assessment [APP-222] says that there are 375 two-way trips, which is 188 vehicles using the site, but our survey showed there to be 570 vehicles. Our view is that this has resulted in the Applicant under-assessing the impact of the scheme on M6 Diesel.
- 4.2 M6 Diesel is registered and identified to HGV drivers by the main fuel bunkering card companies (UK Fuels and Key Fuels) which gives information to drivers on fuelling facilities across the UK. However, this system does not provide precise locational information. Hence drivers on the motorway network will know to leave at M6 J11 or M54 J1 but will not know the precise location of the site.
- 4.3 As stated in our relevant representation, we recognise that the M6 Diesel site would not qualify for truckstop signage from the mainline of the M6 or M54 (as it does not have parking facilities). However, it functions as a motorway filling station, providing an important roadside facility for the strategic road network, and signage from the motorway junctions is important for the following reasons.

Traffic management / road safety

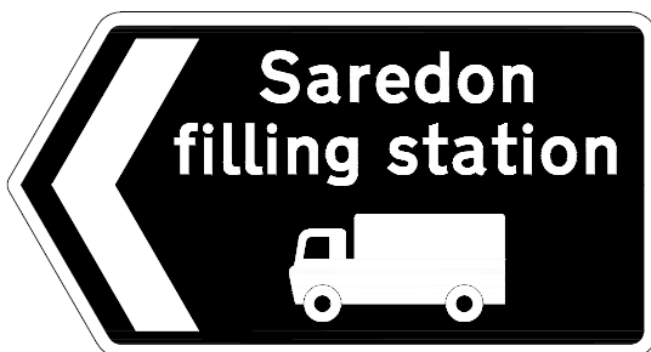
- 4.4 Significant numbers of vehicles each day use M6 Diesel from the M54 or the M6. These vehicles, being HGVs, are long, heavy and can be slow-moving. Drivers will be aware that they need to exit at M6 J11 or M54 J1 but will then not be aware of how to reach the M6 Diesel site.
- 4.5 HGV drivers need sufficient information so they can reach M6 Diesel from the motorway network. Roadside signage has an important role in this, and this is particularly the case on large, busy multi-lane signalised gyratories such as that proposed for M6 J11, given the potential adverse safety implications of drivers making last-second and/or erratic lane changes.
- 4.6 Whilst drivers are likely to have satellite navigation systems, we are aware from previous experience that many drivers and haulage companies do not update their system to take account of road changes. We do not agree that satellite navigation systems should be considered as the only solution, and signage must also be provided.

Impact on the M6 Diesel business

- 4.7 The impact on the M6 diesel business is assessed at paragraph 12.9.63 of the Applicant's Environmental Statement [APP-051]. This states that there is a slight adverse effect but that the effect is not significant.
- 4.8 We do not agree with the assessment of the M6 Diesel site in Paragraph 12.9.63 because:
- As noted above the Applicant has under-assessed the numbers of vehicles using the M6 Diesel site;
 - It assumes the use of up-to-date satellite navigation systems which, for the reasons set out above, we do not agree with;
 - It does not recognise the strategic importance and use of the M6 Diesel site, i.e. serving motorway traffic; and
 - The assessment considers that local access would also become easier as a result of the scheme. Whilst we would agree with this for access to and egress from the M6 Diesel site from and to the existing A460, the assessment overlooks the fact that the traffic to and from the M6 Diesel site will be using M54 J1 and/or M6 J11. In the case of J11, the relatively simple two bridge roundabout is being replaced with a large multi-lane signalised gyratory as shown on Document 2.5 Sheet 6 [AS-067].
- 4.9 By way of a comparison, in the Secretary of State's "minded to refuse" letter for the A303 Sparkford to Ilchester dualling scheme, found at <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010036/TR010036-001597-200721-Final%20Minded%20to%20Refuse%20Letter.pdf>, the Secretary of State "notes that the adverse effect of the Proposed Development on business in the locality, such as the Mattia Diner and adjacent filling station, together with the failure of the Applicant to provide signage to help to mitigate these adverse effects is afforded significant weight by the ExA".
- 4.10 Whilst the circumstances for the A303 scheme will differ, the principle does apply and it is clear to us that the adverse effect on the M6 Diesel site has not been properly assessed by the Applicant and that, as with the A303 scheme, Highways England are failing to provide signage to help mitigate the adverse effect.

Proposed signage

- 4.11 The exact signage positions and sign faces would be a matter for the Applicant to determine. However, our request is for standard geographical "HGV route" signage of the style indicated below, commencing on the M6 J11 and M54 J1 diverge slip roads. The signage legend uses standard geographical wording rather than the M6 Diesel branding.



- 4.12 If the Applicant were to consider that providing such signage could set an unwelcome precedent then our view is that the individual circumstances associated with the M6 Diesel site, as detailed above, give sufficient grounds for this to be a site specific decision that does not set a precedent.