

From: [Simon Hilditch](#)
To: [M54 to M6 Link Road](#)
Subject: M54-M6 link road - Deadline 3 Submission for M6 Diesel (IP 20025351)
Date: 23 November 2020 20:15:42
Attachments: [SAR-BWB-GEN-XX-RP-TR-0004-S2-P1_M6 Diesel Deadline 3 responses.pdf](#)

Dear Sir or Madam

Please find below our Deadline 3 submissions from BWB Consulting on behalf of M6 Diesel (IP ref 20025351).

Deadline 3 (for receipt by the ExA of):	Submission from M6 Diesel
Comments on WRs	Our comments on Written Representations from other parties are contained in the attached document
Comments on SoCGs	Our comments on SoCGs from other parties are contained in the attached document
Comments on LIRs	We have no comment to make on the LIRs themselves but some of the matters covered in the LIRs are the same as those covered in our comments on Written Representations from other parties
Comments on Applicant's first revised draft DCO	Our comments on the Applicants first revised draft DCO from are contained in the attached document
Comments on Integrity matrices as to effects on European sites	Not applicable to M6 Diesel
Submission by the Applicant of low resolution documents (see Annex F)	Not applicable to M6 Diesel
Comments on any additional information/submissions received by D2	Our comments on the Applicants responses to the first written questions are contained in the attached document
Responses to any further information requested by the ExA for this deadline	We are not aware of any further information requested from M6 Diesel for Deadline 3

Best regards

Simon

Simon Hilditch

Director (Infrastructure Design) | BWB Consulting Limited

5th Floor, Waterfront House, Station Street, Nottingham, NG2 3DQ

T 0115 9241100 D 0115 851 7418 W www.bwbconsulting.com



Registered in England and Wales

Registered Office: 5th Floor, Waterfront House, Station Street, Nottingham, NG2 3DQ

Company No. 5265863

VAT Reg No. 648 1142 45

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DEADLINE 3 RESPONSES

M54-M6 LINK ROAD
M6 DIESEL SITE AT SAREDON

Project	M6 Diesel site at Saredon & M54-M6 link road		
Document Number	SAR-BWB-GEN-XX-RP-TR-0004	BWB Ref	NTH2442
Author	Simon Hilditch	Status	S2
Checked	Simon Hilditch	Revision	P1
Approved	Peter Selfe (M6 Diesel)	Date	23.11.2020

1 INTRODUCTION

- 1.1 This document contains the submission for Deadline 3 and covers the following matters:
- M6 Diesel's comments on other parties Written Representations;
 - M6 Diesel's comments on the Applicant's comments to our response to the first written questions;
 - M6 Diesel's comments on the Applicant's latest draft DCO; and
 - An update on the Statement of Common Ground with the Applicant.

2 COMMENTS ON WRITTEN REPRESENTATIONS

- 2.1 The Written Representation from Staffordshire County Council (SCC) [REP1-005] includes specific reference to M6 Diesel. We understand that the matters raised by SCC are also mentioned by other interested parties. However, to avoid unnecessary duplication we will only respond to the SCC representation as this will comprehensively cover the matters in question of concern to us.

Environmental weight restriction on the existing A460

- 2.2 It is clear from the SCC representation that SCC are wanting the scheme to include a 7.5 tonne environmental weight restriction on the existing A460 south of the M6 Diesel site.
- 2.3 The Applicant has, in their draft SoCG with M6 Diesel [REP1-030] stated that "*Highways England does not consider the provision of a traffic regulation order to restrict access to HGVs to be necessary. The current traffic model suggests a restriction would be unnecessary.*"
- 2.4 The Applicant has made a more detailed response in their draft SoCG with SCC [REP1-042] which runs from pages 32 to 35 of that document. The Applicant's response to SCC is summarised as follows:
- There is forecast to be a 90% reduction in HGV use on the existing A460 south of M6 Diesel as a result of the Applicant's scheme;
 - Under a worst-case scenario there is forecast to be a 79% reduction in HGV use on the existing A460 south of M6 Diesel as a result of the Applicant's scheme;
 - SCC have not provided any evidence to justify why the residual HGV use would be unacceptable;
 - SCC have not provided any evidence that a weight restriction as proposed by them (or any alternative) would be effective or that it would not cause unintended adverse effects.
- 2.5 It is clear to us from the Applicant's own analysis that there is no justification for inclusion of an environmental weight limit on the existing A460 to be implemented as either an inherent part of the scheme or as mitigation for an adverse impact. Even under a worst case scenario there will be a

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M6 DIESEL SITE AT SAREDON

significant reduction in HGV use of the existing A460 south of the M6 Diesel site and furthermore, the scheme itself will move traffic on the existing A460 away from the south-eastern part of Featherstone due to the reconfiguration of the existing A460 north M54 J1 as shown on the general arrangement plan sheet 4 [AS-067].

- 2.6 Whilst M6 Diesel support the wider objectives of the Applicant's scheme, we see no reason why M6 Diesel's business should be penalised by the implementation of an environmental weight limit on the existing A460 especially when the Applicant does not consider it necessary through their own modelling. We would therefore object to any such restriction if it were to be included within the scheme and draft DCO.
- 2.7 As stated in our Written Representation [REP1-080], and mentioned by the Applicant in their draft SoCG with SCC, if SCC wish to implement an environmental weight limit on the existing A460 then they are of course, as highway authority, at liberty to make their own proposals using normal traffic regulation orders and consult with affected parties as required.

Journey time information

- 2.8 SCC have stated in their representation that "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". There is no data in the SCC representation to support this and we are unable to find this data in the Applicant's transport assessment [AS-114].
- 2.9 We have asked the Applicant to provide the journey time information so we are able to assess this further. This was requested following a review of the SCC representation but at the time of writing the data has not been received from the Applicant.
- 2.10 Provision by the Applicant of the following journey time information would enable the journey times between the M54 and M6 Diesel to be properly understood in the with and without scheme scenarios. The same start and end points need to be used in all scenarios.

	Using existing A460 between M54 J1 and M6 Diesel		Using the new link road and the M6 J11 gyratory
	During peak hours when A460 is congested	During the hours when the A460 is not congested	
Leaving the M54 at J1 eastbound, to the entry to M6 Diesel			
From the M6 Diesel to M54 J1 heading west			

3 COMMENTS ON THE APPLICANT'S RESPONSE TO 1ST WRITTEN QUESTIONS

- 3.1 The Applicant's responses to the first written questions [REP2-009] includes a response to the answer provided by M6 Diesel on Q1.10.6.
- 3.2 We note in this response that the Applicant has explained what their figure of 375 movements a day relates to and how has been calculated. They have also explained that using M6 Diesel's own count data, the equivalent calculation would be 395 movements per day. As the Applicant points out the figure will vary slightly from day to day and we agree that the data is comparable.

4 COMMENTS ON THE DRAFT DCO

- 4.1 The latest draft DCO was submitted by the Applicant for Deadline 2 [REP2-006]. In this latest draft Article 16 (Traffic regulation) is unchanged from the previous version. On this basis the concerns set out in our Written Representation [REP1-080] remain i.e. that the Article could be used to implement

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permanent changes, which have a significant adverse impact on M6 Diesel, that are beyond what is necessary for construction of the M54-M6 scheme.

5 STATEMENT OF COMMON GROUND (SoCG)

- 5.1 The Applicant has submitted a draft SoCG [REP1-030]. At the time of writing there remain two outstanding matters and we have not received any further information from the Applicant to progress discussions on either of these points.
- 5.2 The Applicant has indicated in their draft SoCG that they wish to understand if M6 Diesel have any other comments on the draft DCO. We can confirm that M6 Diesel has no further comments on the draft DCO other than those set out in our Written Representation [REP1-080].