

## DEADLINE 5 SUBMISSION

M54-M6 LINK ROAD  
M6 DIESEL SITE AT SAREDON



<b>Project</b>	M6 Diesel site at Saredon & M54-M6 link road		
<b>Document Number</b>	SAR-BWB-GEN-XX-RP-TR-0007	<b>BWB Ref</b>	NTH2442
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<b>Approved</b>	Peter Selfe (M6 Diesel)	<b>Date</b>	19.01.2021

## 1 INTRODUCTION

- 1.1 This document contains M6 Diesel's submission for Deadline 5 and comprises our comments on:
- The submission by Staffordshire County Council at Deadline 4 [REP4-042];
  - The Applicant's document 8.19 which contains, among other matters, their responses to other parties' representations made at deadlines 2, 3 and 3A [REP4-033]; and
  - the Applicant's latest draft DCO [REP4-005].

## 2 COMMENTS ON THE SUBMISSION BY STAFFORDSHIRE COUNTY COUNCIL (SCC)

- 2.1 The SCC submission [REP4-042] contains further commentary on why SCC view that a 7.5T environmental weight limit should be introduced together with a plan setting out where they believe the weight limit should be imposed.

### SCC's justification for the weight limit

- 2.2 In our view, the SCC submission does not provide any further substantiation as to why such a weight limit should be imposed over that found in their Written Representation [REP1-005]. M6 Diesel's response to SCC's Written Representation is found in our response to Deadline 3 [REP3-040]. Our points made in our Deadline 3 submission stand and we do not repeat them here.
- 2.3 For the reasons stated in our Deadline 3 response M6 Diesel's position remains that there is no justification for a 7.5T weight limit to be included as part of the Applicant's scheme.

### SCC's proposed weight limit

- 2.4 SCC are proposing that the 7.5T weight limit covers the section of the existing A460 between Hilton Lane and Dark Lane as shown on **Figure 1** below.
- 2.5 For HGV drivers leaving the M6 Diesel site, seeking M54 J1, their satellite navigation system (and road user knowledge if they have used the facility previously) will indicate that they should turn left. Even if signage were to be provided at the exit many drivers would still turn left onto the A460 and our experience from other schemes shows that this will indeed be the case.
- 2.6 At the Hilton Lane junction, HGV drivers would then be faced with all roads having a 7.5T weight restriction as limits would exist on Hilton Lane, Church Road and the existing A460. At this point HGV drivers would therefore have no other legal option but to perform a U-turn on the existing A460. We do not believe that this would be a safe manoeuvre for HGV drivers and could be of detriment to the safety of other road users.

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- 2.7 If HGV drivers decide that it is unsafe or impracticable to perform such a manoeuvre then they will be likely to contravene the weight restriction and continue to travel along the existing A460.
- 2.8 As to HGV drivers coming from the south, they are unlikely to be aware of the extent of the HGV restriction and are therefore likely to consider the “except for access” provision to apply and would continue through to M6 Diesel. To minimise the likelihood of this and to encourage HGV drivers to travel via M6 junction 11, if the weight limit were to be imposed, then we would request HGV signage for M6 Diesel to be installed on the M54 to M6 link road through M54 J1 and on the approach to M6 J11. This would be in addition to the signage set out in our proposed protective provisions [REP4-055].
- 2.9 We therefore consider that the imposition of a 7.5T weight limit as proposed by SCC would be unworkable with many HGVs breaching the restrictions. Furthermore, it is very likely to result in road safety problems as HGVs would have to perform a U-turn to avoid breaching the weight limit.
- 2.10 To conclude, based on the reasons set out above, M6 Diesel strongly objects to the SCC proposal.

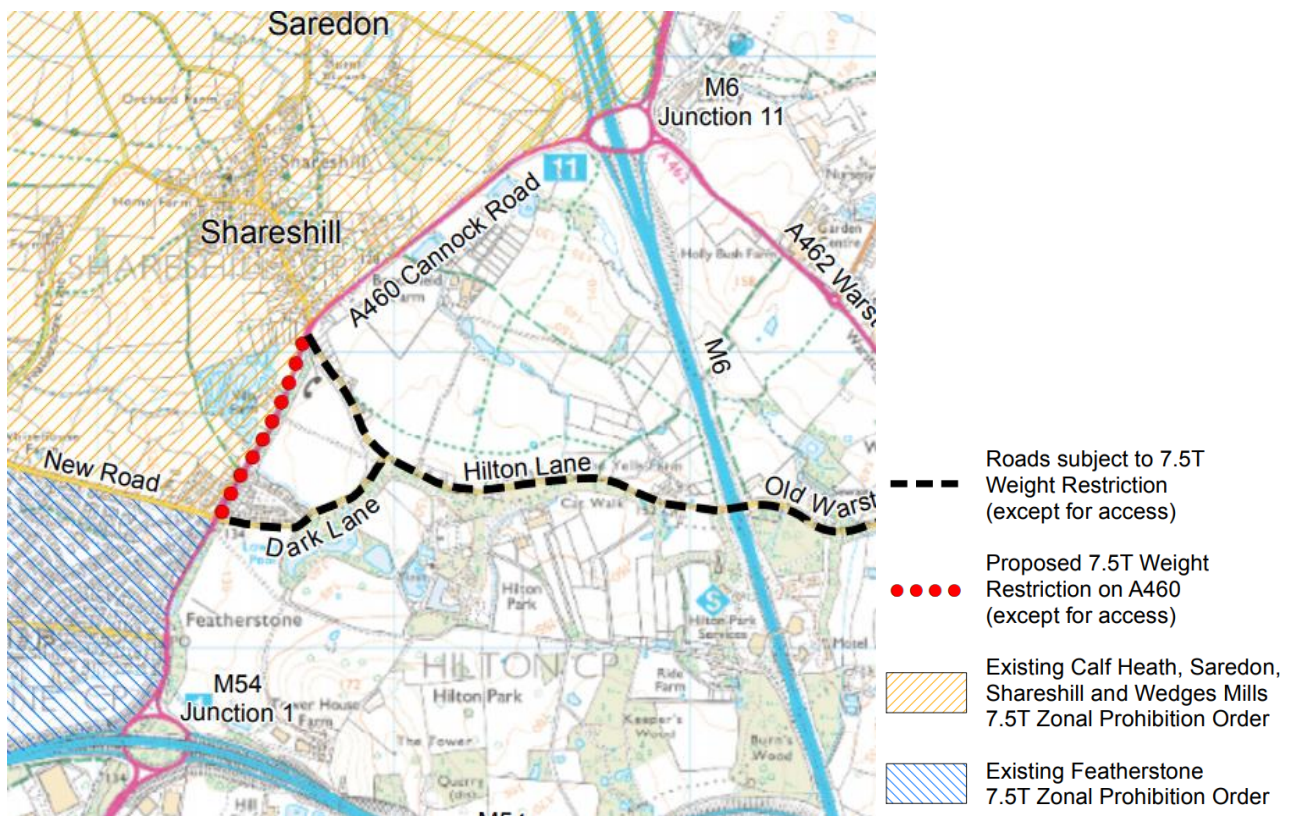


Figure 1: SCC proposed weight limit (taken from SCC deadline 4 submission [REP4-042]).

### 3 COMMENTS ON THE APPLICANT'S DOCUMENT 8.19

- 3.1 In our submission for Deadline 3 [REP3-040], we stated that we had asked the Applicant to provide journey time data between the M54 at J1 and M6 Diesel. This request was made in light of the comment from SCC in their Written Representation [REP1-005] 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”.
- 3.2 The Applicant has, in their document 8.19 [REP4-033], stated in response to our Deadline 3 submission that “M6 Diesel was not modelled as a specific node in the traffic model so this journey time information is not readily available, nor does the Applicant see it as necessary for the assessment of the Scheme”.

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- 3.3 If the Applicant does not have the journey time information available then we do not understand how SCC were able to make this comment in their Written Representation. This further adds to our view that there is no justification for a 7.5T weight limit on the existing A460.

## 4 COMMENTS ON LATEST DRAFT DCO

- 4.1 The latest draft DCO was submitted by the Applicant for Deadline 4 [REP4-005]. In this latest draft Article 16 (Traffic regulation) is unchanged from the previous version.
- 4.2 The Applicant has, in their document 8.19 [REP4-033], stated in response to our Deadline 3 submission that *"The Applicant has explained that the power at Article 16 relates to the construction, maintenance and operation of the Scheme and is subject to the same consultation and publicity requirements that would apply if Staffordshire County Council were to make a TRO"*.
- 4.3 As stated in our Written Representation [REP1-080], any use of Article 16 to make permanent changes to the road network should be clearly stated and we remain of the view that the powers sought could be used to implement a permanent change that was not assessed as part of the scheme.
- 4.4 We do not agree that M6 Diesel would be afforded the same protection if a permanent weight restriction were proposed to be implemented under Article 16 as if it were proposed, by SCC, using standard procedures under the Road Traffic Regulation Act 1984.
- 4.5 Hence our point remains that Article 16 should be limited in scope to only being used for express purposes of construction of the link road as stated in the Explanatory Memorandum [REP2-008] and that the Article should be amended so that the powers sought are limited accordingly.