

PROOF OF EVIDENCE

OF

Dr Ian McKay

On behalf of Roadchef Limited

7th February 2017

1 INTRODUCTION

- 1.1 My name is Dr Ian McKay. In 1979 I gained a BA (Hons) Degree in Town Planning and in 1987 I was awarded a PhD in Human Geography. I have 32 years' experience in roadside services, having started as a Little Chef Acquisition Executive for Trusthouse Forte in 1984. I became Business Development Director for Welcome Break in 1997, and continued until I left in 2006. In 2008 I joined Roadchef Limited as Business Development Director which is my current position. I am responsible for all development and property matters within the Company. I am a Roadchef Limited Board Director.
- 1.2 In this proof, I refer to the proposed road scheme the subject of the Welsh Government's draft orders as "the WG Scheme" and Roadchef's proposed alternative access arrangements to Magor Motorway Service Area (MSA) as "the RC Scheme".
- 1.3 This proof of evidence explains;
1. The facilities which comprise Magor MSA and its distance from adjacent MSAs on the motorway network.
 2. The Role of MSAs on the motorway network, as determined by the UK Government (in the absence of specific guidance from the Welsh Government), which is to support the safety and welfare of road users and the need for motorists to take frequent breaks.
 3. UK Government policy with regard to the spacing of MSAs around the motorway network, in particular what the UK Government believes should be the maximum distance between MSAs.
 4. UK Government policy regarding access arrangements for MSAs and its preference for On-Line MSAs. Junction MSAs are considered to be less attractive to motorway users with the concern that MSAs located further away from the motorway network could discourage drivers from stopping to rest.
 5. Of the 91 MSAs in Great Britain 39 have access from a motorway junction and only 9 have indirect access from the motorway junction

itself. Most importantly none of these have access arrangements as lengthy and tortuous as those proposed by WG for Magor.

6. The different turn in rates at Roadchef MSAs over the last 4 years showing that On-Line MSAs have a turn in rate some 30% higher than junction MSAs which concurs with UK Government's guidance on access arrangements.
7. The likely effect of WG's proposed access arrangements for Magor MSA which will lead to a massive drop in its patronage and its closure. This will increase the distances in MSA provision on the M4 from 16 miles and 33 miles to 49 miles (i.e. Cardiff Gate to Leigh Delamere), with commensurate 16 mile increases to MSAs on the M5.
8. That the WG proposed access arrangements, rather than contribute, will be detrimental to the securing of at least 8 of the 15 transport planning objectives which WG previously agreed with the public and other stakeholders.
9. To secure Magor MSA's long term key strategic role to support the safety and welfare of M4 users the WG proposed access arrangements are inappropriate and will not work for some 80% of motorists. Alternative access arrangements, such as those proposed by RC, which are simple, direct and intuitive as are required for Magor MSA to continue to fulfil its important safety and welfare roles.

2. ROADCHEF LIMITED AND MAGOR MSA

- 2.1 Roadchef Limited is the third largest motorway service area company in Great Britain after Moto Hospitality Ltd and Welcome Break Limited. Blue Boar Motorways Limited, a fully owned subsidiary of Roadchef Limited, opened the United Kingdom's first MSA at Watford Gap on the M1 in 1959 which the company still operates today. Roadchef Limited owns and operates MSAs at 20 locations covering 28 sides of the motorway of which two, Magor and Pont Abraham, are located in Wales on the M4. Within Roadchef's network, 14 MSAs have direct access from the motorway via dedicated slip roads. The remaining 6 MSAs, including Magor, have indirect access via motorway junctions.

- 2.2 In addition to its MSA network Roadchef has a twin sided trunk road service area (TRSA) at Sutton Scotney on the A34.
- 2.3 Magor MSA opened in 1992 following the grant of planning permission for a MSA. With the exception of the fuel filling station, the whole of Magor MSA is owned and operated by First Motorway Services Limited, a company that was fully acquired by Roadchef Limited in 2011. The fuel filling station is owned and operated by Rontec Limited.
- 2.4 The MSA is located at Junction 23A of the M4. It enjoys direct access from Junction 23A, a grade separated junction. It can be accessed by both eastbound and westbound M4 traffic.
- 2.5 The facilities at Magor MSA comprise;
1. An amenity building of 1,374 square metres with a McDonald's, Costa, Chozen Noodle and Fresh Food Café catering offers, a WH Smith shop, 186 internal seats and 100 external seats, toilets, baby changing facilities, shower facilities and telephones.
 2. 231 car parking spaces, 31 HGV parking spaces, 6 coach parking spaces, 5 caravan parking spaces and 2 long vehicle bays.
 3. A 39 bedroom Days Inn hotel.
 4. A picnic area.
 5. 2 electric car charging points.
 6. An Esso branded fuel filling station.
- 2.6 The site of Magor MSA has expansion room for extending the amenity building, car park, coach park and HGV parking areas. Extensions to all of these elements were planned, but their development has been put on hold subject to satisfactory access for M4 motorists being secured in the future. See Simon Turl's Proof of Evidence.
- 2.7 The nearest MSAs on the motorway network, detailed in Mike Axon's Proof of Evidence are,
1. Cardiff Gate MSA (operated by Welcome Break) a junction site on the M4 25.8km (16 miles) to the west.

2. Leigh Delamere MSA (operated by Moto) a twin sided direct access On-Line facility on the M4 53 km (32.9 miles) to the east.
3. Severn View MSA (operated by Moto) a junction site on the M48 18.5km (11.5 miles) to the east.
4. Michaelwood MSA (operated by Welcome Break) a twin sided direct access On-Line facility on the M5 37 km (23 miles) to the north.
5. Gordano MSA (operated by Welcome Break) a junction site on the M5 25.6 km (15.9 miles) to the south.

3. THE ROLE OF MSAs

3.1 Today there are 91 MSAs throughout the British motorway network, of which 6 are located in Wales. I am not aware of any Welsh Government published policy regarding the role, spacing, configuration, accessibility or composition of MSAs in Wales.

3.2 Accordingly it is helpful and instructive to consider past and current policy for England, which has 77 MSAs, as prior to the decentralisation of highway powers and responsibilities to the Welsh Government in 2011, MSA policy for Wales was the same as for England.

3.3 Current Government policy in England is detailed in Annex B of The Department for Transport's Circular 02/2013 dated 10 September 2013 titled "The Strategic Road Network and the Delivery of Sustainable Development".¹ Annex B sets out the requirements for roadside facilities that are eligible for permanent signing on the strategic road network which includes the M4 motorway.

3.4 Paragraph B1 states that,

"This annex sets out policy on the provision, standards and eligibility for signing of roadside facilities on the strategic road network, to enable compliance with the Traffic Signs Regulation and General Directions 2002. It replaces Department for Transport (DfT) Circular 1/2008 Policy on Service Areas and other Roadside Facilities on Motorway and All-purpose Trunk Roads in England".

¹ CD ref 6.1.16

3.5 Paragraph B2 clarifies the main function of roadside facilities, namely that,

“All such proposals will be considered in the context of the National Planning Policy Framework and, in particular, the statement that it includes regarding the primary function of roadside facilities being to support the safety and welfare of the road user”.

3.6 With regard to the application of policy, paragraph B3 confirms that,

“This policy applies to all existing signed roadside facilities, and to all proposed signed roadside facilities”.

3.7 In July 2016 Transport Focus, the UK Government appointed regulator charged with overseeing the newly formed Highways England organisation published a report titled, ‘Take a break: Road users’ views about roadside facilities’² based upon research involving twelve focus groups at various locations around England and input from all major road safety and road user stakeholder groups covering both motorways and major ‘A’ roads. In the light of its findings Transport Focus (page 10, paragraphs 1 and 2) recommends that,

“...Highways England explicitly acknowledges that roadside facilities are an integral part of its customers’ experience, and that it should develop a strategy for the company to play an active role in facilitating high-quality provision to meet their needs, whether on the motorways or major ‘A’ roads”. Furthermore, “While Highways England does not operate MSAs and trunk road services, it should seek to ensure that roadside facilities are meeting the needs of its customers. It is in the company’s interest not only to improve its customers’ journey experience, but to help ensure people don’t drive tired, don’t stop unnecessarily on the hard shoulder and don’t run out of fuel. Quite apart from causing delays, these are often contributory factors in accidents that cause injury or worse”.

3.8 From the above it can be seen that the role of MSAs is to support the safety and welfare of road users.

² At Appendix 2 of this Proof.

4. SPACING OF MSAs

- 4.1 With the safety and welfare of road users in mind the spacing of MSAs around the whole motorway network needs to be taken into account. With regard to the spacing of MSAs around the motorway network Paragraph B4 of Annex B of Circular 02/2013, comments on MSAs' safety function and the need for motorists to take frequent breaks, stating that,

“Motorway service areas and other roadside facilities perform an important road safety function by providing opportunities for the travelling public to stop and take a break in the course of their journey. Government advice is that motorists should stop and take a break of at least 15 minutes every two hours. Drivers of many commercial and public service vehicles are subject to a regime of statutory breaks and other working time restrictions and these facilities assist in compliance with such requirements”.

- 4.2 Paragraph B5 expands on paragraph B4 making the point that,

“The network of service areas on the strategic road network has been developed on the premise that opportunities to stop are providing at intervals of approximately half an hour. However the timing is not prescriptive as at peak hours, on congested parts of the network, travel between Service areas may take longer”.

- 4.3 Annex B then considers what Government believes should be the maximum distance between motorway service areas. Paragraph B6 states that,

“The Highways Agency therefore recommends that the maximum distance between motorway service areas should be no more than 28 miles. The distance between services can be shorter, but to protect the safety and operation of the network, the access/egress arrangements of facilities must comply with the requirements of the Design Manual for Roads and Bridges including its provisions in respect of junction separation”.

4.4 Taking into account speed limits and driving time paragraph B7 confirms that,

“Speed limits in the strategic road network vary and therefore, applying the same principles, the maximum distance between signed services on trunk roads should be the equivalent of 30 minutes driving time”.

4.5 In terms of applicability paragraph B8 highlights that,

“The distances set out above are considered appropriate for all parts of the strategic road network and to be in the interests and for the benefit of all road users regardless of traffic flows or route choice”.

5. ACCESS ARRANGEMENTS FOR MSAs

5.1 Current policy for England makes it very clear that Government has a strong preference for On-Line service areas. In other words MSAs that enjoy direct access from the motorway via dedicated slip roads for both ingress and egress. Paragraph B13 states,

“On-Line (between junctions) service areas are considered to be more accessible to road users and as a result are more attractive and conducive to encouraging drivers to stop and take a break. They also avoid the creation of any increase in traffic demand at existing junctions”.

5.2 Government’s preference for directly accessed On-Line sites is emphasised in paragraph B14 which states in relation to proposed MSAs that,

“Therefore, in circumstances where competing sites are under consideration, on the assumption that all other factors are equal, the Highways Agency has a preference for new facilities at on-line locations”.

5.3 Clearly there are many existing MSAs, including Magor, and some proposed MSAs accessed indirectly via a motorway junction. This situation is recognised and addressed by Government in paragraph B15 which states,

“However, in circumstances where an on-line service area cannot be delivered due to planning, safety, operational and environmental constraints, a site sharing a common boundary with the highway at a junction with the strategic road network is to be preferred to the continued absence of facilities”.

- 5.4 In Circular 02/2013 the only exception detailed regarding service facilities signed on the motorway to the policies previously detailed relates to HGV facilities whereby in paragraph B16 it states,

“An exception to these general location criteria are truck stops located within 2 miles of the strategic road network that otherwise meet the minimum requirements for signing”.

- 5.5 Government’s preference for On-Line MSAs compared to Junction MSAs existed prior to Circular 02/2013. Department for Transport Circular 01/2008 ‘Policy on Service Areas and Other Roadside Facilities on Motorways and All-Purpose Trunk Roads in England’³ published on 2 April 2008 states in paragraph 97,

“Although an MSA situated at a junction may be signed from the motorway, there is a presumption in favour of on-line sites. Junction MSAs are more likely to generate undesirable trips from the surrounding area if the facilities are attractive to local residents. In addition, sites that are located further away from the motorway network might discourage drivers from stopping to rest. Where drivers do make use of such facilities, there is a need to leave the motorway, negotiate the junction and later re-join the motorway. All of these manoeuvres increase the risk of accidents occurring and may cause congestion at the junction or exacerbate an existing congestion problem”.

- 5.6 Junction MSAs were not ruled out, for in paragraph 98 it stated,

³ At Appendix 3 of this Proof.

“However, a junction site may be considered in circumstances where it can clearly be demonstrated that the construction of an on-line MSA would have an adverse impact or could not be delivered due to planning, operational or environmental constraints”.

- 5.7 Further to the aforementioned policy guidance, it has been explicitly recognised by the Secretary of State in planning decisions concerning MSAs that access is a critical issue for MSAs which determines turn-off rates and hence the likely use and success of a MSA. For example, The Office of the Deputy Prime Minister on 16 August 2002 in his decision on the proposed MSA at Hucclecote / Brockworth at Jct 11A of M5⁴ stated in paragraph 15 that,

“The Secretary of State agrees with the Inspector’s view that turning rates would be likely to be low due to the off-line location of the proposed Motorway Service Area (16.86)”.

- 5.8 The Planning Inspector in his report to the Secretary of State⁵ in paragraph 16.86 stated,

“...However, it would be an off-line facility with what I would describe as a tortuous access route. As such, and even recognising that Roads Circular 1/94 does not differentiate between on and off-line MSAs meeting need, I believe it would be unlikely to command serious patronage from M5 motorway users”.

- 5.9 The Planning Inspector then went on to state in paragraph 16.87 that,

“... approaching Hucclecote/ Brockworth, and drivers would have a choice about whether to stop or whether to pass onto either Michaelwood or Strensham. I am in no doubt that the tortuous route here would inhibit its use”.

⁴ At Appendix 4 of this Proof.

⁵ At Appendix 4 of this Proof.

5.10 It should be noted that the proposed Hucclecote / Brockworth MSA site had access arrangements significantly shorter and less tortuous than those proposed by the WG for Magor.

6. ACCESS TO MSAs ON THE MOTORWAY NETWORK

6.1 In Great Britain there are currently 91 MSAs of which 52 are On-Line with direct access from the motorway network via direct access slip roads. The vast majority of these are twin sided facilities, however 4 MSAs are situated on one side of the motorway but have access to the other side of the motorway via a dedicated bridge or underpass solely for the use of motorway traffic.

6.2 Of the 39 MSAs with access from a motorway junction, 30 have direct access from the roundabout junction itself. The 9 MSAs which have indirect access from a motorway junction are accessed from the non-motorway road network. However, all but 2 enjoy access directly from the non-motorway road and involve short distances for motorists to travel as detailed below;

1. Durham A1 (M) J61 - access via A688 a distance of 2.1 km (1.3 miles).
2. Sarn Park M4 J36 - access via A4061 a distance of 1.8km (1.1 miles).
3. Telford M54 J4 - access via A464 a distance of 2.1km (1.3 miles).
4. Donnington Park M1 J23A - direct access for northbound M1 traffic, but access via A453 for southbound M1 traffic a distance of 4.6km (2.9 miles).
5. Bridgwater M5 J24 - access via A38 a distance of 2.1km (1.3 miles).
6. Pease Pottage M23 J11 - access via local road a distance of 2.0km (1.2 miles).

7. Thurrock M25 J30 and J31 - direct access for south bound traffic, but access via A1306 for northbound traffic a distance of 4km (2.5 miles).
8. Peterborough A1 (M) J17 - access via A605 a distance of 1.9km (1.2 miles).
9. Happendon A74 (M) J11 and J12 - access via B7078 a distance of 3.8km (2.4 miles).

All the above distances are significantly shorter than those proposed by the WG for Magor which will involve a detour from the M4 of 7.0km (4.4 miles) eastbound and 6.8km (4.2 miles) westbound.

- 6.3 Only 3 MSAs in Great Britain have sites that do not adjoin the boundary of a motorway as preferred by Government as detailed in paragraph B15 of Annex B of Circular 02/2013, namely Telford, Donnington Park and Bridgwater. The proposed M4 road scheme will add Magor to this non-preferred group. For such sites which are physically removed from the motorway network easy access and high quality signage is essential.
- 6.4 None of the above 9 MSAs with indirect access from the non-motorway network have access arrangements as lengthy, tortuous, and difficult or even counter intuitive as the access arrangements for Magor proposed by the WG Scheme.

7. ROADCHEF MSA TURN IN RATES

- 7.1 Roadchef uses Automatic Number Plate Recognition (ANPR) cameras at the entrances and exits to all of its MSAs to record vehicles utilising each MSA. By cross referencing the number of vehicles entering its sites with the number of vehicles passing the MSA from DfT data from its nearest traffic counters, the turn in rate for each MSA can be calculated. Roadchef has these calculations from 2012 until 2015. It should be noted that for junction sites vehicles on the non-motorway network are not taken into account. Accordingly

the calculated turn in rates for the junction sites are artificially higher than in reality, as some MSA users will have come from the non-motorway network. This of course is not an issue for On-line MSAs as by definition they can only be accessed by motorway traffic.

7.2 Appendix 1 details for the turn in rates at Roadchef's MSAs which in summary were,

	On-Line (%)	Junction (%)
2012	6.4	5.0
2013	6.8	5.3
2014	7.1	5.6
2015	7.0	5.5

7.3 Based upon the above figures On-Line MSAs had a turn in rate of nearly 30% higher than junction MSAs over the last four years. Furthermore it should be noted that all but one of the six junction MSAs has a dedicated access leg from the motorway grade separated junction and one MSA, Northampton (M1), is actually an On-Line site with secondary junction access.

7.4 The above detailed turn in rates for Rodchef's MSAs align with the guidance contained in Department for Transport Circular 02/2013, namely that Government's preference is for directly accessed On-Line MSAs as these are more attractive and conducive to motorists to make stops at MSAs.

8. LIKELY EFFECT OF WG SCHEME ON MAGOR MSA USAGE BY M4 MOTORISTS

8.1 In the 57 years since the first British MSA opened at Watford Gap there is not a single case of the access arrangements to a MSA being so deleteriously affected. Access for either eastbound M4 users or westbound M4 road users will deteriorate significantly, as in order to access Magor MSA lengthy and convoluted detours will be required from the main carriageways of the re-aligned M4 motorway. In my opinion it is highly unlikely that any new

proposed MSA with access arrangements similar to that proposed by the WG Scheme would receive motorway signage from Government in Great Britain.

- 8.2 As the changes to access for Magor MSA in the proposed WG Scheme are unprecedented it is not possible with accuracy to state the fall in turn in rate and usage of Magor MSA should the WG scheme be implemented. What is clear is that Government advice, albeit for England in the absence of published Welsh Government advice or policy, clearly states that On-Line access arrangements for MSAs are preferred as they are more accessible and therefore more attractive and conducive to encouraging drivers to stop and take a break. As Junction MSA sites are less attractive due to their indirect access arrangements, it follows that the longer and/or more convoluted the access arrangements for a Junction MSA the less attractive it will be for motorists on the motorway.
- 8.3 Roadchef believes that the WG scheme will result in a dramatic decrease in the patronage of Magor MSA particularly among car users. It is most likely that following the opening of the WG Scheme some car users will continue to use Magor MSA. However I believe that after their first visit once having experienced the lengthy and convoluted arrangements, a very large proportion will abandon using Magor MSA and will utilise other alternative MSA facilities. Accordingly Roadchef believes the fall in patronage at Magor MSA will be some 80%. See Simon Turl's Proof of Evidence.
- 8.4 Utilising alternative MSA facilities will involve such motorists undertaking longer journey times between stops as the increase in distance to the next MSA will be substantial. Instead of a 16 mile gap between Magor and Cardiff Gate and a 33 mile gap between Magor and Leigh Delamere on the M4 there will be a 49 mile gap between Cardiff Gate and Leigh Delamere. Likewise the gaps from both Michaelwood and Gordano on the M5 motorway to Cardiff Gate will increase 16 miles. With the increase in distance between easily accessible MSAs, some motorists will either not take the necessary rest stops or make other arrangements, such as stopping on the motorway hard shoulders.

- 8.5 In 2016 on behalf of Roadchef Harris Interactive UK Limited undertook customer research surveys at Magor⁶. Their findings support the above assertions in that in the first wave of questions in August some 79% of respondents said that they would be less likely to stop should access to Magor MSA require a round trip of 4.5 miles and 63% stating that they would only stop in an emergency or would not stop under any circumstances. In the second wave undertaken in September, when less holiday traffic was present, the figures were even higher at 85% and 72% respectively.
- 8.6 A fall in the turn in rate for Magor MSA will mean that Magor MSA will become less effective in its road safety function. Furthermore should the turn in rate fall a significant amount, and this is considered most likely by Roadchef, this will ultimately lead to the closure of Magor MSA as it will become unprofitable and unsustainable to operate. See Simon Turl's Proof of Evidence.
- 8.7 The proposed RC Scheme overcomes many of the access issues created by the WG Scheme in that access routes are more direct and shorter, fewer turning movements are required and traffic accessing the MSA always moves in the direction of onward travel of the motorist. In other words unlike in the WG Scheme there is no requirement to undertake double back manoeuvres which involve motorists heading in the opposite direction to that in which they are travelling which for many people may be considered counter intuitive.

9. OBJECTIVES OF THE WELSH GOVERNMENT'S PROPOSED SCHEME.

- 9.1 In the WG's Statement of Case Part 1 for the M4 Corridor around Newport it identifies in paragraph 1.5.5 a total of 15 transport planning objectives which were agreed with the public and other stakeholders.
- 9.2 The proposed lengthy, convoluted, tortuous and arguably counter intuitive WG Scheme access arrangements for Magor MSA will lead to a massive drop in its patronage by M4 users and most likely will result in the closure of the MSA.

⁶ See Appendix 1 to Simon Turl's Proof.

Accordingly these outcomes will not contribute to and indeed will be detrimental to the securing of at least 8 of the 15 transport planning objectives. The 8 objectives which will be deleteriously affected, using the WG's numbering, are as follows;

- 1) Safer, easier and more reliable travel east-west in South Wales.
- 4) Best possible use of existing M4, local road network and other transport networks.
- 7) Improved safety on the M4 Corridor between Magor and Castleton.
- 8) Improved air quality in areas next to the M4 around Newport.
- 10) Reduced greenhouse gas emissions per vehicle and/or person kilometre.
- 11) Improved travel experience into South Wales along the M4 Corridor.
- 14) Easier access to local key services and residential and commercial centres.
- 15) A cultural shift in travel behaviour towards more sustainable choices.

9.3 Alternatively with the proposed RC Scheme Magor MSA will continue to operate and fulfil its highway safety and welfare role and will help meet the transport planning objectives associated with the WG Scheme. Clearly due to its shorter and easier access arrangements the RC Scheme will be beneficial compared with the WG Scheme with regard to environmental objectives.

9.4 The alternative RC Scheme access arrangements will most likely still result in Magor suffering a lower turn in rate estimated by RC to be some 10% from M4 motorists than it currently enjoys as access will not be as simple and direct as the current arrangements. See Simon Turl's Proof of Evidence. However, the fall in patronage will be far less than under the WG scheme and will allow Magor MSA to continue performing its road safety and welfare role and help contribute to securing the planning objectives for the M4 scheme.

10. CONCLUSIONS

- 10.1 The Welsh Government does not have a published policy for the role, spacing, configuration, accessibility or composition of MSAs in Wales. Of the 91 MSAs in Great Britain 77 are situated in England, so it is instructive to consider English policy which currently is contained within Annex B of DfT Circular 02/2013. This makes clear that the primary function of MSAs is to support the safety and welfare of motorway users. The recent Transport Focus report on road users' views about roadside facilities supports this view and makes the points that such facilities are integral to road users' experience and that the provision of high quality services should be encouraged to meet the needs of motorists.
- 10.2 Circular 02/2013 makes clear that motorists should have the opportunity to stop at intervals of some 30 minutes and that the maximum distance between services should be 28 miles. With regard to access, On-Line MSAs are strongly preferred as they are more accessible for motorists and encourage drivers to stop and take a break compared to Junction MSAs.
- 10.3 Of the 91 MSAs in Great Britain only 39 are Junction sites and of these 30 have direct access from the motorway junction in the same way as currently enjoyed by Magor MSA. Of the 9 Junction sites with indirect access from a motorway junction none have access arrangements as lengthy, tortuous and difficult or even counter intuitive as those proposed by the WG.
- 10.4 Roadchef's experience concurs with Government policy in that its On-Line MSAs had a turn in rate some 30% higher than Junction sites as a result of them being more attractive and conducive to motorists.
- 10.5 As Junction MSAs are less attractive than On-Line MSAs due to their indirect access arrangements it follows that the longer and/or more convoluted the access arrangements for a Junction MSA the less attractive it will be for

motorists. The WG access proposals for Magor are unprecedented in the 57 year history of MSAs in Great Britain, as never before have access arrangements been so deleteriously affected.

- 10.6 Roadchef believes that the WG scheme will result in a dramatic fall in the use of Magor MSA by motorway users of some 80%; a figure supported by customer research. Accordingly Magor will no longer fulfil its role in supporting the safety and welfare of road users. In effect Magor MSA will itself be by-passed and the effective gap between services will increase by 16 miles so that the distance between Cardiff Gate and Leigh Delamere MSAs on the M4 will increase to 49 miles.
- 10.7 Such a massive reduction in the patronage of Magor MSA will not only mean it will become compromised in respect of its road safety and welfare functions but it will be economically unsustainable and Magor will close.
- 10.8 The access arrangements proposed by the WG Scheme are not only wholly inappropriate for a MSA but will also be detrimental to achieving 8 of the 15 transport planning objectives for the M4 road scheme agreed by the WG with the public and other stakeholders. RC believes that the WG simply did not take Magor MSA and its access requirements into account when devising the WG Scheme.
- 10.9 The alternative access arrangements proposed by RC which are simple, direct and intuitive will still result in a lower turn in rate of some 10% for motorway users but will allow Magor MSA to continue in its key role in contributing to the safety and welfare of motorway users.

APPENDIX 1

Turn in rates at Roadchef's MSAs

Site Access in line with Motorway											
Site	Roadchef Turn In (2015)	% Traffic to Turn In (2015)	Roadchef Turn In 2015 vs 2014	Roadchef Turn In (2014)	% Traffic to Turn In (2014)	Roadchef Turn In 2014 vs 2013	Roadchef Turn In (2013)	% Traffic to Turn In (2013)	Roadchef Turn In 2013 vs 2012	Roadchef Turn In (2012)	% Traffic to Turn In (2012)
Annandale	1,235,355	5.5%	99,462	1,135,893	5.3%	124,808	1,011,085	4.8%	124,386	886,699	4.3%
Bothwell	929,297	5.6%	(178,515)	1,107,812	6.1%	69,974	1,037,838	5.7%	62,688	975,150	5.4%
Clacklet Lane East	1,820,762	7.0%	125,446	1,695,316	7.4%	85,383	1,609,933	6.9%	(295,689)	1,905,622	7.1%
Clacklet Lane West	1,668,804	7.2%	42,442	1,626,362	6.6%	83,767	1,542,595	7.3%	(195,447)	1,738,042	6.9%
Hamilton	642,306	4.0%	(35,153)	677,459	4.3%	26,516	650,943	4.3%	(10,631)	661,574	4.3%
Killington	731,992	9.7%	67,318	664,674	9.1%	135,237	529,437	7.5%	529,437	0	0.0%
Norton Canes	1,682,502	18.0%	72,207	1,610,295	12.5%	(12,206)	1,622,501	18.0%	89,798	1,532,708	12.4%
Rowhams North	1,188,005	5.0%	144,425	1,043,580	4.7%	24,622	1,018,958	4.5%	26,358	992,605	4.4%
Rowhams South	1,429,914	6.3%	(47,984)	1,477,898	6.8%	266,928	1,210,970	5.2%	38,774	1,172,196	5.3%
Sandbach North	1,231,660	6.0%	3,901	1,227,759	5.5%	110,534	1,117,225	6.0%	20,455	1,096,770	5.1%
Sandbach South	1,435,646	6.7%	(7,394)	1,443,040	6.5%	118,161	1,324,879	6.4%	86,108	1,238,771	6.2%
Sedgemoor	1,343,193	11.5%	(25,411)	1,368,604	12.0%	18,934	1,349,670	9.9%	(4,335)	1,354,005	10.2%
Stafford	1,018,991	4.7%	52,866	966,125	5.1%	(73,880)	1,040,005	5.2%	136,948	903,057	4.5%
Strensham North	1,902,631	10.9%	(132,236)	2,034,867	12.4%	(123,717)	2,158,584	18.5%	224,108	1,934,476	12.6%
Strensham South	2,063,105	12.2%	(156,303)	2,219,408	13.7%	142,801	2,076,607	13.1%	109,183	1,967,424	13.0%
Sutton Scotney North	0	0.0%	0	0	0.0%	0	0	0.0%	0	0	0.0%
Sutton Scotney South	0	0.0%	0	0	0.0%	0	0	0.0%	0	0	0.0%
Taunton North	922,086	7.5%	(988)	923,074	8.0%	104,369	818,705	7.3%	(53,476)	872,181	7.6%
Taunton South	1,308,955	11.6%	72,889	1,236,066	11.3%	125,577	1,110,489	10.6%	68,608	1,046,881	8.1%
Tibshelf North	1,092,603	4.8%	144,115	948,488	4.4%	(78,127)	1,026,615	4.3%	2,244	1,024,371	4.3%
Tibshelf South	1,161,050	5.7%	(2,692)	1,263,742	5.8%	90,493	1,173,249	4.9%	39,662	1,133,587	5.1%
Watford Gap North	1,445,635	7.4%	(82,328)	1,527,963	7.6%	(72,587)	1,600,550	7.6%	64,268	1,536,287	7.5%
Watford Gap South	1,797,089	9.2%	(66,491)	1,863,580	9.4%	150,711	1,712,869	8.3%	206,470	1,506,399	7.2%
Total	28,151,581	6.9%	89,576	28,062,005	7.0%	1,318,298	26,743,707	6.7%	1,264,902	25,478,805	6.3%
Site Access via junction											
Chester	1,648,801	3.6%	26,258	1,622,543	3.6%	180,788	1,441,755	3.3%	(84,168)	1,525,923	3.6%
Durham	981,880	4.1%	(59,189)	1,021,069	4.4%	(1,269)	1,022,338	4.2%	147,496	874,842	3.8%
Magor	1,704,456	5.5%	54,801	1,649,655	5.6%	46,051	1,603,604	5.9%	121,509	1,482,095	5.3%
Malchstone	1,408,561	4.7%	(161,261)	1,569,822	5.7%	45,194	1,524,628	5.6%	65,065	1,461,563	5.2%
Northampton North	1,148,922	5.2%	(19,429)	1,168,351	4.6%	202,857	965,514	4.5%	(17,802)	983,316	4.5%
Northampton South	1,119,401	4.7%	(5,872)	1,125,273	4.8%	(71,124)	1,196,397	5.3%	5,085	1,193,312	5.2%
Pont Abraham	521,769	5.1%	71,958	449,811	2.8%	449,811	0	0.0%	0	0	0.0%
Total	8,515,790	4.4%	(92,934)	8,608,724	4.5%	852,268	7,754,456	4.2%	233,185	7,521,273	4.1%

APPENDIX 2

Transport Focus, July 2016 'Take a break: Road users' views about roadside facilities'.



Photo courtesy of Highways England

Take a break

Road users' views about roadside facilities

July 2016



Jeff Halliwell

Foreword

For road users making longer journeys, stopping at services is an integral part of the journey experience. This can be for a short toilet and fuel stop, or parking for longer to rest and eat. For lorry and coach drivers services are an essential part of doing their job, given legal requirements to take regular rest breaks and, for some, the need to stay overnight.

In our *Road user needs and experiences* research¹, we found that some users had concerns about the facilities available at service areas. Transport Focus wanted to follow this up and research users' views about roadside facilities on England's motorways and major 'A' roads.

Of course, it is worth noting that services are operated by private companies. In order to be signed from the motorway they have to provide a minimum level of facilities. They are otherwise free to provide the facilities, shops, food and drink outlets they think will meet the needs of their customers. They can set prices as they see fit.

We found that most road users are broadly satisfied with services on motorways. People's needs are largely functional. They want to use the toilet and buy a coffee, sandwich and fuel. These functional needs are generally met. Road users told us that you know what you'll get at a motorway service area and it's usually provided. That doesn't mean everything is perfect, with concern about cleanliness, particularly of toilets, and the cost of food, drink and fuel.

We found lorry drivers to be less happy with roadside facilities, whether on a motorway or a major 'A' road. They told us their needs are often not fully met. They feel there are too few spaces for heavy goods vehicles (HGVs) to park at the locations and times they need to stop. Even when there is space to park, what is provided does not always help drivers rest properly before getting back behind the wheel. Many lorry drivers and organisations in the freight sector tended to have the view 'The law says I must stop and rest, but nobody helps me do it.'

We found that road users' views of services on

major 'A' roads, known as trunk roads, were less favourable. People talked about inconsistency, poor quality and low confidence that even their basic needs would be met. This extended to lack of clarity about where those services are, what time they are open and what facilities are available. Whereas on a motorway road users said they know what they'll get and are basically happy with it, this wasn't the case on major 'A' roads.

The main conclusions Transport Focus draws from this research are that:

- Highways England should explicitly acknowledge that roadside facilities are an integral part of their customers' experience. It should develop a strategy for the company to play an active role in facilitating high-quality provision to meet their needs, whether on the motorways or major 'A' roads.
- Highways England should develop a strategy to ensure there is sufficient capacity for lorries to park in the right places and with facilities that meet drivers' needs. It will need to work with the freight industry, government, local authorities and others to do this.
- Operators of service areas should seek to meet road users' challenge that they want greater consistency in cleanliness, especially of toilets.

I hope this insight into road users' views will be helpful in improving the experience for road users stopping at services. It is clearly in the interests of those who operate services that their facilities meet road users' needs. But it is also in Highways England's interest not only to improve its customers' journey experience, but to help ensure people don't drive tired, don't stop

unnecessarily on the hard shoulder and don't run out of fuel. Quite apart from causing delays, there are safety reasons as these are often contributory factors in accidents that cause injury or worse.

Transport Focus will use the research as we explore with Highways England, government and those who operate services how the issues highlighted can be addressed.

Finally, we are considering whether to follow this research with a survey of road users' satisfaction with motorway service areas on an ongoing, quantitative

basis. This would enable operators to benchmark customer experience and measure improvement over time. It would complement the Strategic Roads User Survey which will launch in 2017.



Jeff Halliwell
Chair
Transport Focus

Summary of research findings

Most road users' needs from roadside facilities on the motorways and major 'A' roads managed by Highways England are largely functional. For example, to use the toilet and buy a coffee or a snack. This means roadside facilities are primarily judged by users on the basis of whether these basic needs have been met successfully.

Many road users, especially those driving for leisure or business purposes, for example to visit family or to attend a meeting, are broadly satisfied with motorway service areas (MSAs).

Professional drivers, those who drive for a living, tend to make more frequent use of roadside facilities. They have more complex needs and are less satisfied with MSAs. Lorry drivers especially generally prefer to stop at dedicated truck stops where possible.

Services on motorways meet most road users' basic needs, both in terms of the range and quality of facilities available and their frequency and location on the motorway network. What road users value about MSAs is their consistency and reliability. They have confidence, even when travelling on an unfamiliar route, that MSAs will meet their essential needs:

toilets, food and drink. The main concerns expressed were inconsistent cleanliness, especially of toilets, and the cost of food, drink and fuel.

In contrast, services on trunk roads (major 'A' roads managed by Highways England) are perceived to lack both consistency and quality. Road users lack confidence that essential facilities, even basics such as toilets, will be available. Signage often offers little reassurance.

Roadside facilities are of greater significance to lorry drivers because they are legally required to stop driving after a certain number of hours. Their compliance with the law is monitored and when their driving time is up they have to stop to rest or face prosecution. This means they try to plan their stops and are often forced to adjust their plan according to traffic, lack of parking spaces or hold ups on the road.

The research identified a key concern with inadequate parking capacity for lorries which can lead to drivers stopping, even overnight, in locations with few or no facilities such as laybys, retail and business parks or even slip roads, the hard shoulder and other prohibited areas.

Motorway service areas

leisure, business and professional users

Most of the discussion with road users in the research focused on motorway service areas. This is partly a reflection of the frequency of use of MSAs compared with trunk road facilities, but also that the MSA 'offer' is coherent and consistent. This characteristic means that most road users' expectations are already set before they stop.

Overall, MSAs meet the needs of most users. They are typically satisfied with the number and frequency of MSAs. Feedback is generally positive on the quality of facilities and the high street brands available.

Leisure users in particular commented on recent investment in MSA premises and welcomed improvements made by operators. Gloucester services on the M5 were highlighted by some users as an example of a facility with a distinctive 'offer', such as local produce and 'green' outside space.



There is a clear difference between the views of professional users, where driving is integral to their job, and those making journeys for leisure or on business. Leisure users recognise that prices for fuel, food and drink are higher than elsewhere. But some are more accepting as it is a once-in-a-while purchase – even seen as an occasional 'treat' by some. In contrast, professional drivers are often frequent users and the price of fuel, food and drink at MSAs is a real concern. They perceive that they have no choice but to pay expensive prices, with the impact felt directly in their pocket or sometimes by the business they own.

Professional users still find MSAs adequate for quick, basic stops where they use the toilet and 'grab and go' food or coffee. But they are more inclined than others to seek out lower-cost options off the motorway at retail parks and supermarkets.

The most significant improvement users sought was in cleanliness, particularly of toilets. Ensuring that toilets are kept consistently clean is a priority for improvement for all user types. All users, especially professional users, would also view better value food, drink and fuel as welcome improvements.

Other improvements suggested included:

- more green spaces and attractive outdoor areas
- clearer signage of caravan parking
- more comfortable indoor seating
- greater choice of healthy hot meals
- improved Wi-Fi.

"The fuel is expensive, I will only get fuel at a service station if it's an absolute emergency."

"It's good to have brands that you recognise. Ones that are credible and good quality and consistent across the country."

Motorway service areas

lorry drivers

Lorry drivers report that when making short, functional stops MSAs meet their basic needs: toilet, fuel and a hot drink or quick snack. However, MSAs rarely meet all their needs and lorry drivers perceive that MSAs are 'not for them'. They report not feeling welcome or that their needs are not understood. Lorry drivers' perceptions of MSAs depend on the complexity of their needs, with those staying overnight feeling the most negative about their experiences.

Parking is a concern for all lorry drivers. Drivers report lack of capacity in some locations and availability of spaces is variable, especially later in the day. For those drivers who require long-stay parking at MSAs this is seen as expensive. Some drivers resort to laybys and industrial or retail parks to avoid the cost. Many drivers are concerned about the lack of security for lorries at MSAs. Some report experiencing thefts from their vehicles and point to the lack of floodlights, security fencing and CCTV. A further complaint is that the parking area is often noisy, with noise from engines and refrigeration units making it difficult to get good quality rest. They also perceive 'their' parking area to often be physically remote from the main facilities and that spaces can be small, making parking difficult.

Some drivers appreciate the meal options available, for example fast food outlets such as McDonald's or Burger King, but for many the lack of 'home cooked' meals is a concern. This is not just about wanting more than only fast food options, though these are felt to be unhealthy and become repetitive

for those eating at MSAs regularly. It is as much about the ambience and overall dining experience. Drivers also report that meal vouchers offered in return for purchasing long-stay parking are often insufficient to cover reasonable costs.

Lorry drivers making overnight stops often find this a frustrating experience. The lack of a dedicated driver lounge to give them an opportunity to socialise and relax is seen as a problem. Another frequently raised concern is shower facilities, which may be too few in number and are sometimes not kept clean.



"The car parks are getting bigger for cars, but the lorry spaces are getting smaller."

"They don't give lorry drivers what they need, we're not made to feel welcome."

Truck stops lorry drivers

"The staff are happier and friendly, it's a much more personal experience."

"Truck stops become full, laybys become full, and then it becomes a real big problem of like where can you safely park your vehicle?"

Many lorry drivers compare MSAs with truck stops specifically designed for lorries and their drivers.

Truck stops are considered variable in terms of quality and range of facilities available. However, they are generally perceived to be better for lorry drivers than MSAs. Truck stops often have relatively inexpensive 'sit-down' restaurants where they can get 'home cooked' meals. Some also have bar and lounge areas.

These facilities don't just address their functional needs. They also offer drivers the opportunity to relax and socialise with their fellow drivers rather than be confined to their cab.

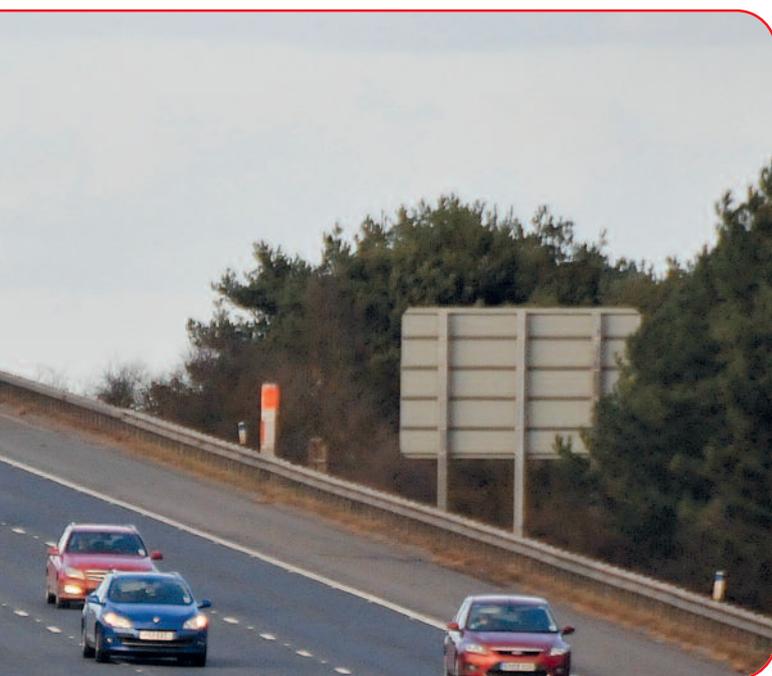
Parking at truck stops is perceived to be better value and quieter than at MSAs and sometimes more secure, with fencing and CCTV or other measures to prevent theft. The parking surface can be very rough, but the greatest concern is the availability of and capacity at these facilities. Drivers report that there often aren't truck stops located where they need them. Even where they exist availability of spaces later in the day can be a problem.



Services on major 'A' roads

Road users found it difficult to define services on major 'A' roads. They often spoke about petrol stations and other retail establishments on or next to the road, as well as facilities that are signed from it as 'services'. This reflects the wider variety of stopping options road users can choose from on these routes. It also shows that users find that, on the whole, these services lack a coherent and consistent identity.

Road users considered services on trunk roads to be unpredictable and variable in terms of opening hours, cleanliness and basic amenities. Some services offer a range of facilities comparable with MSAs, while others are felt to be very limited. The research suggests that some drivers, including women travelling alone, feel less confident about their personal security at trunk road services than when stopping at an MSA. This means that in contrast to MSAs, road users perceive trunk road facilities to lack reliability, consistency and the assurance that essential facilities such as toilets will be available.



Road users highlighted signage as an area for improvement for services on trunk roads. They pointed out that signs were often not very informative, variable in level of detail and unclear. For example they appear to be dark, faded, or small. Again, the overall criticism is of lack of consistency; while some signs are informative, others just say 'services'. This does not provide road users with the necessary confidence that the core amenities they require will be provided. It was suggested that, as a minimum, signs should make clear if a toilet is available.

"They're generally not as well lit or signed. The toilets are awful and safety at night is a concern..."

"It's a bit run down, the toilets aren't the nicest of toilets but when you're desperate you just go don't you? I wouldn't actually stop here again."

Laybys on major 'A' roads

Most road users rarely use laybys on major 'A' roads. If they do stop it is typically unplanned, for example to make a phone call. Users who stop rarely leave their vehicle, except perhaps to make a purchase from a snack van. In fact most road users don't really consider laybys to be roadside facilities at all, in the way they understand MSAs or other services. This is because they lack the basic amenities they look for when stopping. They tend to think that laybys are 'just for lorry drivers'.

Some lorry drivers use laybys frequently, either to take short rests, or in some cases to spend the night. The lack of facilities presents a more significant problem for these drivers, especially the lack of toilets. Lorry drivers report having no choice but to relieve themselves outside. While many of the drivers we spoke to were used to this, when probed in the focus groups they thought having to stop where there are no toilets is not really acceptable.

All types of road users share safety concerns about stopping in laybys. This is particularly the case for leisure users travelling with children or pets, or women travelling alone. The main reason stopping is perceived as dangerous is their proximity to

fast-moving traffic. Lorry drivers point out very short slip roads also increase the risk of a collision.

In some parts of the road network lorry drivers rely on laybys to take their mandatory rests, but they recognise there can be safety reasons to support their removal. They do not necessarily object to laybys being closed, but lack of parking capacity overall is a key concern. Removal is acceptable only if the capacity is replaced elsewhere.

We asked all road users to consider whether they would stop at 'enhanced laybys' that might be separated from the road and offer more facilities. Some users occasionally mentioned French 'Aires de Service' and felt that these would provide a safer alternative to traditional laybys. To be useful, however, users said these facilities would require separation from the road, picnic benches, bins and clean toilets. They were sceptical that these facilities would be kept clean and well maintained.

"Sometimes we'll stop to read the map but it has to be a pretty desperate stop."

"You shouldn't have to do your necessities on the side of the road in laybys, they should have toilets."





Views of organisations in the freight sector

The organisations in the freight sector we talked to about roadside facilities provided similar feedback to the lorry drivers and supported their concerns. However, they added that issues with the quality and availability of roadside facilities, and in particular the lack of capacity for lorry parking, are impacting the industry more widely. They report that the requirement to take regular rest breaks, monitored by tachograph, combined with the lack of capacity at suitable roadside facilities, contributes to driver recruitment and retention challenges. These stakeholders' top priority is improving capacity for lorry drivers to take their rest breaks, especially on motorways.

The stakeholders also raised concerns that MSAs are not designed for lorry drivers, pointing to expensive parking, food and fuel, the fast food, poor overnight facilities such as showers and a lack of security. Stakeholders also perceive that truck stops are better than MSAs overall, with lower prices and facilities tailored to lorry drivers. However, they say that truck stops are too few in number. This often requires significant detours to reach them and they lack capacity as parking spaces tend to fill up early. Truck stops are perceived to be variable in quality, which they suggest may be improved by creating minimum standards. Laybys provide an alternative and make up for lack of capacity elsewhere. Fewer laybys are now available and they say replacement capacity is not being provided.

The stakeholders perceive that one of the most significant obstacles to meeting the demand for parking capacity is obtaining planning permission and funding for new facilities.

They report it can take up to 10 years for a truck stop to be built and that many developers give up. There is a perception that there is little help or support from government or Highways England. They suggest that Highways England should work more collaboratively with planning authorities to speed up the process for agreeing to new lorry parking facilities.

"Drivers are not offered the facilities they demand or indeed deserve. This is one of many reasons why the industry suffers from a shortage. Why would anyone choose a career that in a number of cases treats them as a second-class citizen?"

"It's fine if they want to close laybys for security reasons, but where are the drivers supposed to go if there is no room anywhere else?"

Recommendations

In light of these findings, Transport Focus makes the following recommendations

Services are part of the road user experience

Transport Focus recommends that Highways England explicitly acknowledges that roadside facilities are an integral part of its customers' experience, and that it should develop a strategy for the company to play an active role in facilitating high-quality provision to meet their needs, whether on the motorways or major 'A' roads.

Roadside facilities, from MSAs to laybys, make up part of the experience of using Highways England's network for many road users. While Highways England does not operate MSAs and trunk road services, it should seek to ensure that roadside facilities are meeting the needs of its customers. It is in the company's interest not only to improve its customers' journey experience, but to help ensure people don't drive tired, don't stop unnecessarily on the hard shoulder and don't run out of fuel. Quite apart from causing delays, these are often contributory factors in accidents that cause injury or worse.

The research identified that users tend to be much less satisfied with services on trunk roads than with MSAs. A key reason is the real or perceived lack of consistency in the quality of services, and the consequent lack of confidence road users have that services on trunk roads will meet their needs. We recognise that there will continue to be differences in the size, style and range of facilities available at trunk road services. However, Highways England should work with the operators of services to seek improvement in the overall quality and consistency of the offer to road users.

Lorry parking capacity and the needs of drivers

Transport Focus recommends that Highways England develops a strategy, working with the freight industry, government, local authorities and others, to ensure there is sufficient capacity for lorries to park in the right places and with facilities that meet drivers' needs.

It is clear from the research that lorry drivers and the freight industry are concerned about roadside facilities and, in particular, lack of capacity for lorry parking. Lorry drivers are required to take regular rests by law for safety reasons. They report that MSAs do not understand and cater to their needs and parking capacity at suitable locations is inadequate. This is leading to drivers having to stop, sometimes overnight, in locations such as laybys that lack even a toilet; the most basic of facilities. They see nobody taking responsibility for ensuring adequate provision of suitable places to stop with the facilities they need to rest before continuing to drive. One of the primary roles of the Strategic Road Network is to facilitate the movement of goods around the country. Highways England should lead efforts to ensure that roadside facilities are meeting the needs of lorry drivers and the freight industry.

Signing of trunk road services

Transport Focus recommends that Highways England develops a strategy for signing services on trunk roads with the objective of providing greater assurance to road users about the facilities available.

The research shows that a blue motorway sign reading simply 'services' provides road users with confidence, based on past experience, about what they can expect. This could inform Highways England's approach to trunk road signage to make it more informative and to give a fair impression of the facilities available. This need not necessarily include adding additional information to signs, though this may be helpful. Perhaps blue 'services' signs could be used on the trunk road network where services meet motorway standards? Or could alternative words, symbols or colours signal to drivers that particular trunk road services meet a minimum standard? Similar information could be provided to satnav and app developers.

Providing advance notice of services on trunk roads should be considered. The research found that motorways users find mileage boards advising of services ahead reassuring and useful. If it is helpful on a motorway to understand your stopping options, there seems no reason why it would not also be helpful on trunk roads. If providing mileage boards on Highways England's 'A' roads prevents even a small proportion of drivers from running out of fuel or not stopping to rest when they should, there will be safety and other benefits. The current situation also leads to misleading information. For example, on the A1(M) in Hertfordshire signs indicate how far it is to the next motorway

service area on the A1(M) at Peterborough, failing to mention the many services on the intervening section of A1 trunk road between Baldock and Alconbury.

Information about roadside facilities

Transport Focus recommends that Highways England seeks to ensure

that there is trusted and reliable information available to users about services and roadside facilities on or near the Strategic Road Network.

The research not only found that road users lack confidence in the availability, consistency and quality of services on trunk roads, but also that it seems to road users that there is a lack

of information about roadside facilities generally. This could be improved by making trusted information more readily available to users and third-party website and app developers. The lack of information about roadside facilities can be contrasted with the detailed information, including opening hours, availability of toilets and other facilities, provided about railway stations.



Cleanliness of toilet facilities

Transport Focus recommends that operators of motorway service areas and other services seek to meet road users' challenge that they want greater consistency in cleanliness, especially of toilets.

One concern about both motorway service areas and trunk road services that was shared by all road users was cleanliness, especially of toilet facilities. Access to clean toilet facilities is a basic requirement for road users when they stop, and toilets that are not clean are likely to result in a poor experience.

How we carried out this research

The research involved 12 focus groups at various locations around England, covering both motorways and major 'A' roads. Road users taking part included drivers making leisure and business trips, as well as those who drive as part of their job (for example delivering parcels).

Four of the focus groups looked at issues specific

to lorry drivers, and we interviewed coach drivers, disabled drivers, motorcyclists and a number of stakeholders within the road freight industry.

We also incorporated 'in the moment' feedback from road users visiting eight services of different size, age, geographic location and run by a range of different companies.



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APPENDIX 3

Department for Transport Circular 01/2008 Dated 2 April 2008, 'Policy on Service Areas and Other Roadside Facilities on Motorways and All-Purpose Trunk Roads in England'.

DEPARTMENT FOR TRANSPORT

DfT Circular 01/2008
Department for Transport
Great Minster House, 76 Marsham Street, London SW1P 4DR

2 April 2008

POLICY ON SERVICE AREAS AND OTHER ROADSIDE FACILITIES ON MOTORWAYS AND ALL-PURPOSE TRUNK ROADS IN ENGLAND

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INTRODUCTION

1. Circular 01/2008 sets out policy on the provision, standards and signing of roadside facilities on the Strategic Road Network (SRN), including motorway service areas (MSAs), motorway rest areas (MRAs), truckstops, and services and lay-bys on all-purpose trunk roads (APTRs). It also sets out the role of the Highways Agency in relation to such facilities. This supersedes previous guidance contained in Roads Circular 01/94, the MSA Policy Statement of 1998, and Annex J to Circular Roads 04/94 (in respect of the SRN).
2. The provisions described in this policy would all have effect in England only.
3. This policy applies in respect of all signed roadside facilities on the SRN that do not have a planning application registered with the relevant Local Planning Authority (LPA) prior to 2 April 2008. The policy will also apply to the redevelopment of existing roadside facilities that do not have a planning application registered with the LPA prior to this date, when the gross floor area of a facility increases by 50 per cent or more.
4. Additionally, the relevant section of this policy will apply when any specific element of an existing facility is redeveloped, such as parking or toilets.
5. However, it is recognised that constraints on land availability at some existing sites may mean that it is not possible to meet all of the requirements of the policy when redevelopment of the whole site or a given element takes place. In such circumstances, compliance will become a subject of negotiation with the Highways Agency.
6. MSAs and other roadside facilities perform an important road safety function by providing opportunities for the travelling public to stop and take a break in the course of their journey. Government advice is that motorists should stop and take a break of at least 20 minutes every two hours. Drivers of heavy goods vehicles (HGVs) are subject to a regime of statutory breaks, and such facilities offer the opportunity for this.
7. The Government's objective is to encourage greater choice in the provision of service facilities for all road users, thereby encouraging drivers to take breaks more frequently and so reducing the number of fatigue-related accidents. The Government aims to work with the private sector to increase public satisfaction with roadside facilities in terms of their quality and value for money.
8. Operators of both new and existing roadside facilities in England are required to ensure that their sites are fully accessible to all members of the travelling public regardless of ability, race, gender, faith, age or sexual orientation. MSAs and other roadside facilities are required to comply with all existing and future equality legislation.
9. New and existing roadside facilities are subject to the provisions of the Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004, which together set the framework under which local planning authorities are to consider applications for such developments. The Secretary of State for Transport is designated as a statutory consultee, and the Highways Agency exercises this function on his or her behalf, giving advice on applications in respect of road safety and traffic

management issues. Power to grant access from the highways to all roadside facilities is given under Section 62 of the Highways Act 1980. The provision of traffic signs for service areas is governed by the Road Traffic Regulation Act 1984.

10. Until 1992, the Department for Transport was responsible for developing MSAs: acquiring land, funding construction and leasing the completed sites to operating companies. Since 1992, government policy has been that the private sector should take the initiative in identifying and acquiring MSA sites and seeking planning consent from local planning authorities. When completed, these MSAs are owned by the private sector rather than the Government. The Government, through the Highways Agency, continues to have an interest in these (new and existing) privately owned sites, in relation to motorway safety and traffic management.
11. Operators of both new and existing MSAs, whether leased from the Government or privately owned, must comply with the requirements of government policy. These provisions are reflected in the Traffic Signs Agreements into which they enter with the Highways Agency. If they do not observe these conditions, action can be taken which could ultimately lead to the closure of sites. However, operators have responsibility for all other operational matters at MSAs, including pricing and staffing levels.
12. The development of roadside facilities on APTRs has traditionally been led by the private sector, with the Highways Agency providing advice on road safety and traffic management issues.

DESTINATION IN ITS OWN RIGHT

13. MSAs, MRAs, all-purpose trunk road service areas (TRSAs) and on-line truckstops should only provide facilities needed to serve people using the SRN in the course of a journey.
14. The primary function of the SRN is to facilitate long-distance transportation of people and goods. Service areas are signed from the SRN on the basis that they will provide essential services to road users. The potential risk to safety that is created by additional accesses and egresses is balanced by the improvement to safety resulting from refreshed and alert drivers.
15. Government policy is to discourage service areas and other roadside facilities from becoming destinations in their own right. A destination in its own right would be created if drivers were attracted onto the SRN solely to visit the service area. This is likely to involve short, local trips onto the SRN which would not otherwise be taken and might therefore interfere with the safety and flow of long-distance traffic.
16. Allowing a service area to become a destination in its own right can have a negative impact on road safety. Firstly, traffic on the road would increase and junctions would become more congested (and therefore potentially more dangerous). Secondly, increased patronage by local customers might place pressure on capacity at service areas, which could discourage drivers from stopping there to take a break during a long journey.

17. Furthermore, to permit a service area, or similar site, to become a destination for local customers would be contrary to government planning policy on retail and town centres as set out in *Planning Policy Statement 6: Planning for Town Centres*.¹ The consequence of this would be to threaten the viability of businesses in cities, towns or other local centres.
18. For these reasons it is important that the Highways Agency is consulted on any proposal affecting an existing or proposed service area.

IMPACT ASSESSMENT

19. If operators wish to make changes to their sites, they should first seek confirmation from the Highways Agency's Spatial Planning Team (or any successor) that their proposals conform to standards laid down in this circular as well as DfT Circular 02/2007 *Planning and the Strategic Road Network*.²
20. To safeguard the interests of all users of the SRN, operators of existing MSAs, MRAs and TRSAs and promoters of new MSAs, MRAs and TRSAs will be required to carry out Impact Assessments in respect of any proposed activity that is not specifically permitted under this policy or in respect of a permitted activity on a scale greater than that allowed for by this policy. Impact Assessments will enable the operator/promoter to detail how an activity will impact upon the SRN and service-area customers. This will allow the Highways Agency to give full consideration to proposed activities and their potential impact on the delivery of policy objectives. This mechanism cannot be applied in respect of activities prohibited by this policy.
21. Impact Assessments will enable the Highways Agency to make informed, evidence-based decisions on the impact these activities will have at facilities on the SRN.
22. Early consultation with the Highways Agency to discuss the scope of the Impact Assessments is encouraged. However, operators will still need to ensure that their proposal is fully compliant with national planning policy and equality legislation and seek planning approval in the normal manner.
23. The Impact Assessment will be evidence-based and its scope should first be agreed with the Highways Agency. As a minimum, operators will be expected to provide:
 - a detailed explanation of what is proposed;
 - a scale plan showing where the proposed facility will be located and its size;
 - an account showing how current activities at the service area will be affected by the proposal (for example, the impact on parking spaces of a coach interchange);
 - an assessment to demonstrate that the proposal would not result in the facility becoming a 'destination in its own right';

¹ Planning Policy Statement 6 'Planning for Town Centres', can be found online at www.communities.gov.uk/publications/planningandbuilding/planningpolicystatement11
² www.dft.gov.uk/pgr/regional/strategy/policy/circular207planningandstrategic

- a breakdown of current and forecast customer numbers;
 - a breakdown of any proposed enhancement of facilities (e.g. number of toilets, amount of indoor seating provided);
 - details of the anticipated benefits that the activity will provide to the service area user;
 - details of any potential adverse impact on normal use of the service area;
 - details of measures to mitigate any adverse impacts;
 - details of the monitoring proposed to ensure that the impact of the development is consistent with the Impact Assessment.
24. Operators/promoters will be required to demonstrate that their proposal does not have a potential to generate new vehicle trips on the SRN or, if new trips will be generated, how overall vehicle mileage will be reduced. They must also be able to show that the activity will cause no detriment to the safety or convenience of road users or those wishing to use the essential facilities.
25. If any of the above could occur, the operators will be required to demonstrate how the undesirable effects will be mitigated to the Highways Agency's satisfaction.
26. Proposals that provide overall benefits and otherwise meet with the Highways Agency's approval will be allowed, subject to a licensing regime agreed between the Highways Agency and the operator.
27. This approach cannot be used to attempt to justify activities that are prohibited under this policy.

DETERMINING THE NEED FOR ROADSIDE FACILITIES ON THE STRATEGIC ROAD NETWORK

28. DfT Circular 02/2007 *Planning and the Strategic Road Network*³ endorses the Highways Agency's role as a consultee in the planning system. Any roadside facility proposal will need to comply with the policy set out in that Circular. The Highways Agency will provide input to local development frameworks (LDFs), assisting LPAs to consider whether there is sufficient provision of roadside facilities on the SRN by taking account of traffic flows and the need for motorists to stop and take a break at regular intervals. Developers can expect that proposals which are in accordance with the LDF will, in most cases, be granted approval, unless material considerations indicate otherwise.
29. As a statutory consultee to LDFs, the Highways Agency will provide advice to LPAs on a range of issues, including the need for the provision of additional roadside facilities. The Highways Agency will also, when asked, provide input on the need for new roadside facilities to assist in the review of Regional Spatial Strategies.

³ www.dft.gov.uk/pgr/regional/strategy/policy/circular207planningandstrategic

30. In assessing any application for a new roadside facility, the Highways Agency will consider the impact of development on the SRN alongside the needs of road users. The Highways Agency will need to be satisfied that the access and egress to the roadside facility can be provided safely, that it conforms to Departmental standards and that it will not have a materially adverse effect on the capacity or performance of the SRN, in addition to considering the potential road safety benefit of a service area in reducing driver fatigue.
31. The Highways Agency will continue to assess the impact of any roadside facility proposal on traffic flow and safety. It may oppose particular developments when the location is considered unsuitable, where, for instance, there are existing capacity or infrastructure constraints. Roadside facility proposals must also be weighed against the achievement of other policy objectives for the SRN. However, the LPA will continue to determine the planning merits of any proposal.

ACCESS TO THE STRATEGIC ROAD NETWORK

32. As outlined in DfT Circular 02/2007, there is a general presumption against additional accesses to the motorway and other routes of strategic national importance other than for *'service areas, facilities for the travelling public, maintenance compounds and, exceptionally, other major transport interchanges'*.
33. Therefore, the Highways Agency will not agree to the provision of accesses to the SRN from private developments for the purpose of service provision other than for facilities that meet the standard range of minimum requirements set out in this circular, nor will it permit the development of activities at service area sites which are unconnected with the immediate needs of the travelling public and which would therefore lead to the site becoming a destination in its own right.
34. LPAs and developers are encouraged to discuss with the Highways Agency at the earliest opportunity any proposals to develop new roadside facilities to extend existing facilities or to sign existing facilities. The Highways Agency is particularly interested in facilities located wholly or partly within 400 metres of the motorway boundary, or developments exceeding 2 hectares in area that include the provision of fuel and refreshments and are situated within 1 kilometre of a motorway junction.

CHANGE OF USE OF REDUNDANT ROADSIDE FACILITIES

35. The Agency will oppose any change in permitted land use in respect of any roadside facility with direct access to the SRN if it ceases to operate. If any alternative use were to be allowed other than one that serves the immediate needs of the travelling public, there is a risk that additional, unnecessary trips might be generated on the network. Through its role in the planning system, the Highways Agency will seek to restrict alternative developments.
36. To prevent sites becoming derelict, the Highways Agency will seek the imposition of planning conditions that require sites to be landscaped, returned to agricultural use or otherwise rendered compatible with the surrounding landscape. All accesses to the SRN will be removed and the former highway boundary restored.

REAR ACCESS/ACCESS TO OTHER DEVELOPMENTS

37. Under normal circumstances, rear access roads connecting a roadside facility to the local road network will not be acceptable. Where, exceptionally, an access is agreed, the Highways Agency will expect developers to enter into arrangements to ensure its use is restricted to staff, deliveries, emergency services and agents and staff of the Highways Agency acting on behalf of the Secretary of State for Transport. If a connection to the local road network is needed to facilitate deliveries and staff access, the associated service yard and parking area normally should be physically segregated from the main MSA parking areas and circulatory roads by the provision of a permanent vehicular barrier.
38. Access to other developments through roadside facilities is not permitted.
39. All sites should be provided with a secure boundary fence to prevent unauthorised access by pedestrians and/or vehicles from adjacent roads and/or land.

DESIGN STANDARDS

40. In considering issues affecting the SRN, traffic flow and safety considerations are of great importance. Any access provided direct to the SRN would need to conform fully to the *Design Manual for Roads and Bridges* (DMRB) and any other relevant Departmental standard. At all roadside facilities, it will be particularly important to avoid significant adverse impacts upon the effective functioning of the SRN, such as the risk of congestion or slowing on the main carriageway. Proposals for new roadside facilities should not unduly conflict with meeting the objective of improving road performance through better network management. Advice on these aspects should be sought from the relevant regional office of the Highways Agency.⁴
41. The Government believes that good design should be the aim of all those involved in the development process. Those promoting service-area schemes will therefore be expected to demonstrate that they have taken account of the need for high standards of design in formulating their proposals.
42. In design terms, roadside facilities schemes should:
 - respond sensitively to both the site and its setting, including the existing landscape and other physical features, and take account of the purposes of any designation that may cover the site or the surrounding area; create character and identity within the site by the careful design of spaces and buildings and the relationship between them; and minimise the visual impact of the development on its surroundings;
 - incorporate vehicle accesses and means of circulation that are safe, clear to motorists and minimise vehicle congestion: with this in mind, developers will be required to apply the relevant Departmental standards when designing service area accesses and internal layouts; to submit the resulting proposals for processing through the formal road safety audit procedures set out in the DMRB;

⁴ Relevant contact details may be found at www.highways.gov.uk

- ensure that all traffic signing (including road markings) for drivers using the site complies with the Traffic Signs Regulations and General Directions 2002 (TSRGD);
 - be able to show that the proposal will cause no detriment to the safety or convenience of road users or those wishing to use the facility;
 - achieve building designs that take account of the needs of all users,
 - incorporate buildings that are safe, environmentally friendly and energy efficient so as to maximise sustainability and minimise environmental damage and waste;
 - ensure the sensitive design and siting of lighting schemes with the aim of minimising light pollution and light-spill onto adjacent roads, whilst ensuring that public areas are well lit;
 - in preparing the design for their lorry parking facilities, operators should give due consideration to the need for security, ensuring that there is adequate lighting and taking account of lines of sight from occupied buildings.
43. Future customer demand/capacity should be an early consideration within the design process.
44. Under normal circumstances, a bridge or underpass connecting facilities on opposite sides of a motorway or trunk road will not be permitted.
45. The internal layout of new service areas and proposed amendments to existing layouts must be subjected to a full Road Safety Audit carried out in accordance with the DMRB.
46. The access/egress arrangements for new and redeveloped roadside facilities must accommodate all types of vehicle permitted to enter the site, including abnormal loads (see paragraphs 86 to 88 below).

FUNDING OF WORKS

47. The full cost of any works within the motorway or trunk road boundary (including traffic management), will be met by the developer by means of an agreement with the Secretary of State under Section 278 of the Highways Act 1980.⁵

STANDARDS OF FACILITIES

48. Roadside facility operators should endeavour to provide high-quality facilities at all times. This will instil confidence in road users that, when they stop at a facility, their essential needs will be met. It is in the interests of operators to encourage drivers to use their facilities for as long as they require to rest. By ensuring consistently high standards of hygiene, service, catering, seating and other facilities, operators are likely to increase both customer numbers and lengths of stay. The consequence will be better-rested and more-alert drivers, and this is likely to have a positive impact on road safety.

⁵ Guidance on S278 Agreements can be found at www.dft.gov.uk/pgr/regional/strategy/policy/guidance/section278highwaysact

49. Roadside facilities can provide an important first impression for visitors to England. Thus it is vital that facilities can offer all road users a clean, safe and welcoming environment in which to rest during the course of their journey.
50. Improved standards at MSAs and MRAs will be promoted through the mechanism of an independent quality award scheme based on a cyclic inspection regime. Participation is voluntary, but the operators are encouraged to take part and assist in defining the framework for the system. However, it is expected that the scheme will include access and other equality issues as a consistent factor.
51. Advice on equality issues should be sought from national access and equality groups. Quality awards based on the outcome of the inspections should be displayed prominently within the amenity building; one 'star' will be the lowest rating possible, as it is necessary to distinguish participating and non-participating sites. Results may also be displayed on sign 2917 of the Traffic Signs Regulations and General Directions (TSRGD) (see Annex A).

SPACING OF ROADSIDE FACILITIES ON MOTORWAYS

52. Policy on the spacing of roadside facilities on motorways needs to balance the road safety benefit of allowing drivers regular access to services with the potential detriment to safety, traffic flow and the environment of development alongside motorways and at motorway junctions.
53. Drivers are encouraged to stop and take a break of at least 20 minutes every two hours. Drivers of HGVs are required by drivers' hours' legislation to take a break at specified intervals. Research has shown that up to 20 per cent of accidents on monotonous roads (especially motorways) are caused by tiredness. However, roadside facilities introduce new on- and off-motorway movements that have their own safety implications, and may disrupt the free flow of traffic.
54. There is also a need to limit development alongside motorways and motorway junctions to mitigate the impact of strategic roads on the environment. This applies particularly, though not exclusively, to open countryside and areas of planning restraint such as National Parks, Areas of Outstanding National Beauty (AONBs), the Green Belt and sites that either are themselves, or may affect, Sites of Special Scientific Interest (SSSIs). Finally, any development accessed from a motorway (including roadside facilities) risks the creation of additional local journeys that would not previously have been made.
55. The existing network of MSAs has evolved around a long-standing spacing criterion of 30 miles. This was based on the premise that drivers should be given the opportunity to stop at intervals of approximately half an hour. However, at peak hours, on congested parts of the network, travel between MSAs can take longer than 30 minutes. Further, 90 km/h (56 mph) speed limiters for HGVs limit the distance they can travel in 30 minutes to a maximum of 28 miles (45 km). Any new application for a core MSA should therefore be considered on the basis of a 28 mile (45 km) distance, or 30 minutes' travelling time,⁶ from the previous core MSA, whichever is the lesser.

⁶ Median average inter-peak travelling time.

56. The absolute minimum acceptable distance between facilities on the same route is 12 miles.
57. All existing MSAs, and new facilities that have been registered in the planning systems prior to the date of publication of this document (which subsequently receive planning consent) and any future sites that fill existing gaps in the core network must provide the required features of a site having that status.
58. Where a clear and compelling need and safety case can be demonstrated, applications for an infill service area may be considered. Individual cases will need to be treated on their merits, and it is not possible to prescribe a comprehensive list of the factors which it might be appropriate to consider in every case. There are, nevertheless, a number that are likely to be of importance in virtually all cases. Planning authorities therefore will be expected to have considered at least:
 - the distance to adjoining roadside facilities;
 - evidence (such as queuing on the roadside facility approach roads or lack of parking spaces at times of peak demand) that nearby existing roadside facilities are unable to cope with the need for services;
 - evidence of a genuine safety-related need for the proposed facilities (such as, for example, a higher than normal incidence of accidents attributable to driver fatigue);
 - whether the roadside facility is justified by the type and nature of the traffic using the road; the need for services may, for example, be lower on motorways used by high percentages of short-distance or commuter traffic than on those carrying large volumes of long-distance movements.
59. Where infill sites are proposed, the Government's preference will be that they should be located roughly halfway between MSAs, unless it can be shown that an off-centre location is more suitable in either operational, safety or spatial planning terms or in its ability to meet a particular and significant need. The Government will not agree to more than one infill site between any two core MSAs. Where the spacing between two existing MSAs is 40 miles or greater, any infill site that might be permitted will also be designated as a Core site and must provide the required range of facilities (see paragraphs 67 to 71 below).
60. Where the spacing between existing Core sites is less than 40 miles, any infill site that might be permitted may take the form of a Rest Area.
61. Rest Areas will provide some though not necessarily all of the range of facilities of a Core MSA.

PICNIC AREAS AT MSAS AND MRAS

62. Picnic areas are attractive to many drivers who would like to stop and take a break without leaving the motorway but who prefer to bring their own food rather than purchase it. All new MSAs and MRAs are required to provide picnic areas.

63. Operators of existing core MSAs are encouraged to invest in picnic areas at their own sites. The availability of a picnic area will increase the likelihood that drivers will stop and take a break at the MSA.
64. Provided the criteria set out in paragraphs 65 and 66 are met, MSA operators may indicate the availability of their picnic area to motorway users by the addition of a 'picnic area' symbol to diagram 2919.1 of the TSRGD (normally situated half a mile before the MSA).
65. The picnic area must be equipped with a minimum of ten tables, each with seating for six. Properly covered rubbish bins must also be provided within picnic areas. These are to be regularly emptied to avoid any spillage. Operators are encouraged to provide cover for the picnic area when possible.
66. The picnic areas provided at MSAs and MRAs should be laid out in an attractive setting. If the picnic area is segregated from the amenity building and the main car park by a circulatory carriageway, dedicated parking for motorcycles, cars and caravans/motorhomes as well as toilet facilities shall be provided at 0.1 of the figures set out at Annex B (rounded up) so as to avoid the need for pedestrians to cross the traffic flow.
67. The Highways Agency will work with the operators to increase the quality and availability of picnic area facilities at existing sites.

MANDATORY FEATURES OF AND LEVELS OF PROVISION FOR ROADSIDE FACILITIES ON MOTORWAYS

Requirements for motorway service areas

68. All MSAs (including the network of Core sites defined at paragraph 57 above) must provide as a minimum the following facilities for 24 hours a day, 365 days a year:
 - free parking for up to two hours for all types of vehicle (see Annex B);
 - free toilets and hand-washing facilities for all road users, with no obligation to make a purchase (see Annex C);
 - parent/carer and child facilities containing baby-changing amenities;
 - access to a signed, free, private breastfeeding area;
 - a free picnic area (meeting the criteria set out at paragraphs 65 and 66 above);
 - access to a cash-operated telephone (card phones alone will not suffice);
 - fuel;
 - snacks and hot drinks;

- free play area for children;
 - the site must also comply with all current and future equality legislation.
69. There must also be hot substantial food and hot drinks available between the hours of 6 am and 10 pm.
70. Under the Licensing Act 2003, any premises that provide late-night refreshment (i.e. hot food and drink) between 11.00 pm and 5.00 am for sale to the public require appropriate permission from the local licensing authority.
71. Access must be permitted for up to two hours for those carrying out emergency repairs to broken-down vehicles.
72. Access must be permitted for parties carrying out duties for and on behalf of the Secretary of State for Transport.

Requirements for motorway rest areas

73. A facility designated as a Rest Area must be open for 24 hours a day, 365 days a year and provide the following facilities:
- free parking for up to two hours for all types of vehicle at half the level required for MSAs (see Annex B);
 - free toilets and hand-washing facilities for all road users, with no obligation to make a purchase (see Annex B);
 - parent/carer and child facilities containing baby-changing amenities;
 - access to a signed, free, private breastfeeding area;
 - access to a cash-operated telephone (card phones alone will not suffice);
 - a free picnic area (meeting the criteria set out at paragraphs 64 and 65 above);
 - free play area for children;
 - the site must also comply with all current and future equality legislation.
74. Access must be permitted for up to two hours for those carrying out emergency repairs to broken down vehicles.
75. Other facilities provided would be at the discretion of the operator, but in every case these must be in full compliance with the other requirements of this policy.
76. Access must be provided for parties carrying out duties for and on behalf of the Secretary of State for Transport.

LEVELS OF PROVISION AT ROADSIDE FACILITIES ON MOTORWAYS

Parking general requirements

77. MSAs, and MRAs must provide free short-term parking for all classes of vehicle. Annex B sets out the method for calculating how many parking spaces must be provided for certain classes of vehicle and users at MSAs and MRAs.
78. The operator/designer of the MSA or MRA should reach agreement with the Highways Agency on the most appropriate method of controlling traffic and the layout of parking areas within the site (see 'Design Standards').

Parking for disabled travellers

79. Parking bays for disabled users of all types of vehicle should be located in close proximity to the main entrance of the amenity building. The number of bays dedicated for use by disabled travellers is set out in Annex B.

Facilities for motorcyclists

80. Operators should provide dedicated signed parking spaces for motorcyclists, enabling the rider to secure the bike to a sound structure. They should be located close to the amenity block for security reasons. A number of free lockers should be provided for storage of helmets and clothing, so that riders may rest comfortably. However, a deposit charge may be levied to ensure the return of keys.

Parking for caravans, motorhomes and other light vehicles towing trailers

81. Parking for caravans/motorhomes and other light vehicles towing trailers should not be located within the HGV parking area. A safe walking route from the parking area to the amenity building should be provided. Further, the parking area should not be situated such that manoeuvres cause a safety issue for other customers (see paragraphs 45 and 46). Parking bays should be laid out in a drive-through pattern so that caravan, motorhome and light vehicle trailer towing drivers are not required to reverse to exit.
82. A minimum of two parking bays suitable for caravans/motorhomes and other light vehicles towing trailers should be situated close to the amenity building for the convenience of disabled users of such vehicles (see Annex B).
83. Operators may provide overnight parking facilities for caravans and motorhomes. Facilities for the supply of fresh water, electrical hook-up and the disposal of foul and grey water may also be provided. However, caravans and motorhomes should not be permitted to stay on site for more than a maximum of twelve hours.
84. Operators are also expected to provide parking for vehicles towing all types of trailer (including horseboxes and trailer tents).

Coach parking

85. Coach parking should be segregated from the HGV parking area and a safe walking route to the amenity building should be provided.

Provision for abnormal loads

86. At MSAs, parking facilities suitable to accommodate abnormal-load vehicles should be provided for the purpose of statutory rest breaks or escort handover.
87. The minimum requirement is for the provision of a single bay capable of accommodating abnormal loads that are covered by the Road Vehicles (Authorisation of Special types) (General) Order 2003. This covers loads up to 30 m rigid length, 6.1 m wide and 150,000 kg total weight (maximum 16,500 kg axle weight). An allowance should also be made for a tractor unit for tractor/trailer combinations, so the bay should have a minimum length of at least 47.5 m.
88. However, the promoter of a new MSA should liaise with the Highways Agency's Abnormal Load Team regarding any need for enhanced provision, such as multiple bays or provision for larger 'Special Order' categories of vehicle.

HGV parking

89. In addition to the minimum parking spaces for HGVs, operators are required to provide shower and toilet facilities within the HGV parking area (for numbers see Annex B). A snack bar located within the HGV parking area providing hot food and drinks is permitted. A safe walking route to the amenity building should also be provided.
90. Operators are required to permit self-propelled horse boxes (as opposed to trailers – see paragraph 77) to park in the HGV parking area.

Toilets

91. Annex C indicates how the number of toilets should relate to the number of parking spaces. If an operator believes that the calculation will lead to overprovision of facilities, the Highways Agency will consider requests for derogation from these requirements, based on an impact assessment.
92. The standards laid down in the Charter of the British Toilet Association are commended, and the Highways Agency strongly advises all operators to meet its requirements.

Parent/carer and child rooms

93. Parent and child facilities should be provided at the levels laid down in Annex B.
94. Such facilities should be separate and not combined with toilets. Parent and child facilities must be fully accessible to disabled users.
95. The female parent/carer and child room must contain a screened area with seating, where women who do not wish to breastfeed in public can do so in private. This facility should be clearly signed.
96. However, operators are encouraged to adopt breastfeeding-friendly policies and should consider displaying the international breastfeeding symbol prominently in their amenity buildings.

ON-LINE AND JUNCTION SITES

97. Although an MSA situated at a junction may be signed from the motorway, there is a presumption in favour of on-line sites. Junction MSAs are more likely to generate undesirable trips from the surrounding area if the facilities are attractive to local residents. In addition, sites that are located further away from the motorway network might discourage drivers from stopping to rest. Where drivers do make use of such facilities, there is a need to leave the motorway, negotiate the junction and later rejoin the motorway. All of these manoeuvres increase the risk of accidents occurring and may cause congestion at the junction or exacerbate an existing congestion problem.
98. However, a junction site may be considered in circumstances where it can clearly be demonstrated that the construction of an on-line MSA would have an adverse impact or could not be delivered due to planning, operational or environmental constraints.

SIGNING OF ROADSIDE FACILITIES

Signing on road network

99. Annex A details the criteria for signing all types of roadside facilities on the road network and the signs that should be used.

Signing within roadside facilities

100. All traffic signs and markings within roadside facilities should conform to the standards laid down in the TSRGD 2002 as amended or replaced from time to time.

Advertising within roadside facilities on the motorway

101. Advertisements situated within roadside facilities on motorways that are visible from the motorway are not permitted. This includes advertisements mounted internally or externally on footbridges or connecting road bridges.

TRAFFIC INFORMATION POINTS AT MSAS

102. To help the travelling public make informed travel decisions and plan their onward journeys, MSA operators are encouraged to provide traffic information to customers. Operators are also encouraged to provide sufficient space to support the installation of a Traffic Information Point.
103. Where a Traffic Information Point is installed, the Highways Agency will be happy to advise on its location and size, on a case-by-case basis.

RETAIL ACTIVITIES AT MSAS AND MRAS

Retail general requirements

104. The Government is committed to the principle of discouraging MSAs and MRAs from becoming destinations in their own right. A modest degree of retail development is permitted, so that MSAs and rest areas may serve the needs of road users, but not so

that they attract customers from the local area. Creating a destination in its own right would generate additional trips on the motorway network and may have an adverse impact on local retail trade.

105. The maximum retail sales floorspace permitted at an MSA or MRA is 500 m². Additional areas may be used for retail storage, but there shall be no public access and sales shall not be permitted from these areas. Where an MSAs amenities are split between two distinct sites on either side of the motorway, it will be permitted to have up to 500 m² of retail space at each site, provided customers are not required to cross the motorway to reach essential facilities. Where floorspace provision in excess of 250 m² per side is proposed, the provisions in paragraphs 106–108 shall apply:
 - any existing footbridge or underpass connecting the sites must be taken out of normal public use with a view to removal at an appropriate time;
 - a full range of services (including toilets, and hot substantial meals between 6 am and 10 pm) must be available and open at each site.
106. Trading will not be permitted on bridges connecting two sides of an MSA or MRA.
107. The floorspace restriction is set at a level to allow MSAs and MRAs to provide an adequate range of facilities to serve the travelling public. It has no direct correlation with traffic flows. Therefore, an MSA or MRA situated at a junction and which serves traffic using both carriageways is permitted only 500 m² of retail floorspace.
108. Operators are encouraged to provide a range of alternative catering outlets that would increase the choice available to road users.

Games area

109. MSAs and MRAs are permitted, in addition to retail space, a modest games/gaming machine/exercise machine area not exceeding 100 m² to provide drivers and passengers with an opportunity to relax during long trips.

TOURIST INFORMATION CENTRE

110. Operators are encouraged to develop and promote tourist information services by participation in the Enjoy England Official Partner programme promoted by Visit Britain. Space should be allocated within MSAs to undertake this activity, which will not be counted against the 500 m² retail limit. In order to provide an income stream to support the delivery of this service, an accredited tourist information centre located within an MSA may be accompanied by an additional 50 m² of retail floorspace (over and above the 500 m² limit as per paragraph 105) for the sale of products originating from the region.
111. Tourist information facilities may also be provided at MRAs.

FUEL FORECOURT

112. The petrol filling station is permitted a retail facility that is limited in scale and genuinely ancillary to the sale of fuel.⁷
113. Operators are encouraged to provide basic safety facilities such as air and water at no cost to customers.
114. Operators are encouraged to provide a wide range of fuels, including LPG and bio-fuels.
115. Operators are expected to provide assistance at pumps for disabled travellers.

SALE OF ALCOHOL

116. There is to be no sale or consumption of alcohol anywhere on the premises of a MSA or MRA.

LODGES

117. Service areas are permitted to provide a lodge offering overnight accommodation for drivers/passengers.
118. When located at an on-line MSA MRA or TRSA, lodges are expected to only serve traffic using the side of the carriageway on which the lodge is sited, unless a dedicated link road to the other side of the facility is provided.
119. The overnight accommodation is to serve road users on the way to their destination, and will not be permitted to become a destination in its own right.⁸ The lodge will be allowed to provide dining facilities.
120. There is to be no sale or consumption of alcohol within MSA or MRA lodges.
121. The lodge will be required to provide one parking bay per two lodge bedrooms in addition to the parking provision required for the service facilities.
122. Impact Assessments will be required for any proposal that exceeds the above criteria⁹ or where operators seek to deviate from the minimum criteria. Early discussions with the Highways Agency will enable the scope of the Assessment to be agreed.

CONFERENCE FACILITIES AND BUSINESS CENTRES AT MSAS

123. MSAs can offer a sustainable location at which to hold business meetings by reducing the overall distance that delegates need to travel. Operators may therefore be permitted to develop a modest conference facility or business centre at an MSA, where the proposal is supported by an acceptable Impact Assessment.¹⁰ This would need to demonstrate either that no new trips would be generated on the SRN, or, if there would be, that overall vehicle mileage would be reduced.

⁷ See Planning Policy Statement 6: Planning for Town Centres
www.communities.gov.uk/publications/planningandbuilding/planningpolicystatement11

⁸ See paragraphs 13–18.

⁹ See paragraphs 19–27.

¹⁰ See paragraphs 19–27.

124. Approval could only be granted if the MSA was shown to be an appropriate location for such a facility. It is unlikely that an MSA located close to a major settlement would be granted approval for a conference facility or business centre, as it would be likely to attract business from established centres and draw traffic onto the motorway from the local area.
125. Any conference facility or business centre should have additional parking spaces (approximately 0.75 spaces per delegate) and dedicated toilet facilities in adequate numbers.
126. The Highways Agency will not approve any proposal that would cover a floor area of greater than 200 m².
127. There is to be no sale or consumption of alcohol at conference facilities and business centres.

COACH INTERCHANGE/PARK-AND-RIDE/PARK-AND-SHARE AT ROADSIDE FACILITIES

General

128. The Highways Agency recognises that, because of their location between major settlements, MSAs can in certain circumstances be appropriate locations from which to promote or facilitate alternative sustainable means of travel. The benefit would be a reduction in overall vehicle mileage, leading potentially to reduced congestion and pollution, and improved road safety.
129. The construction/operation of park-and-ride/coach interchange or park-and-share facilities at an MSA or MRA would be subject to the production of an Impact Assessment, approved by the Highways Agency, which demonstrated that there would be an overall reduction in vehicle mileage.

Coach interchanges

130. Coach interchanges allow coach operators to increase the overall efficiency of coach movements. Feeder coaches bring passengers to the interchange, from where they can then be taken to a variety of destinations. By permitting an interchange at an MSA, it might be possible to reduce the need for coaches to leave the motorway to exchange passengers at a facility on the local road network. Provided that no extra trips are likely to be generated, the Highways Agency has no 'in principle' objection to the establishment of this type of facility at an MSA. Proposals will be judged on their merit, based on an Impact Assessment.
131. Any benefits of a coach interchange must be balanced with the needs of other motorway users to stop and take a break. Therefore operators should discuss their proposals with the Highways Agency at the earliest opportunity to agree the scope of the Impact Assessment. If a coach interchange is permitted, the operator will need to provide appropriate infrastructure (for example a parking area, a canopy and additional toilets) to ensure that customer safety and convenience are not compromised. No MSA will be permitted to operate a coach depot or otherwise to become a destination in its own right.

Park-and-ride

132. Park-and-ride schemes have the potential to reduce overall vehicle mileage and/or urban congestion. Where a scheme would link an MSA to a nearby city centre, additional parking spaces (over and above the minimum requirements defined in Annex B) would need to be provided at the MSA to meet demand. The scale of the additional parking would be determined through the Impact Assessment. For this form of park-and-ride, a relatively long car journey would be followed by a short bus ride, contributing to a reduction in the number of vehicles joining the local road network from the SRN.
133. An alternative form of park-and-ride would involve relatively short trips by car prior to a medium- to long-distance coach journey. To reduce the number of short trips on the motorway, wherever possible the car park/drop-off point should be located outside the MSA area and accessed from the local road network, with passengers provided with a safe walkway to board the coach from within the MSA. Operators would be required to demonstrate that this arrangement could not be achieved, before the Highways Agency would give any consideration to allowing the car-park/drop point to be built within the MSA.
134. Any park-and-ride proposal must be supported by an Impact Assessment, the scope of which should be agreed in advance with the Highways Agency. The risk with park-and-ride schemes is that travellers will switch from public transport to the private car for the early stage of their journey. The Impact Assessment will need to demonstrate that this would not occur.

Park-and-share

135. To promote sustainable travel, operators might wish to encourage drivers to park at an MSA and share the remainder of their journey. This would help to reduce overall vehicle mileage. Any park-and-share facility would have to provide long-stay parking in addition to existing minimum parking provision (as defined in Annex B), and there should be no detriment to drivers using the MSA to stop and take a break in the course of their journey. Any park-and-share facility must be agreed with the Highways Agency and will be considered subject to an acceptable Impact Assessment.

TRUCKSTOPS SIGNED FROM THE MOTORWAY NETWORK

136. In order to be signed from the motorway, a truckstop must meet the following criteria:
 - Signing should normally be limited to truckstops within 2 miles of the motorway that provide a minimum of 30 HGV parking spaces.
 - Truckstops should provide as minimum facilities: fuel; hot drinks and food; showers; adequate parking to cater for expected demand; free short-term parking (minimum two hours); free flush toilets together with hand-washing facilities of sufficient number to cope with demand, and access to a cash-operated telephone (card phones alone will not suffice).
 - These minimum facilities must be available 24 hours a day every day except Christmas Day, Boxing Day and New Year's Day.

137. Signing will not be provided where, in order to reach the truckstop, HGVs would be required to pass through residential areas.

SIGNED SERVICE AREAS ON ALL-PURPOSE TRUNK ROADS (TRSA)

Spacing

138. There is a clear need at intervals along trunk roads for fuel, parking, toilet and refreshment facilities, including picnic areas. From the point of view of both the safety and convenience of travellers there is advantage in the grouping of such facilities at appropriately sited and spaced locations, without the need (or opportunity) to cross traffic flows or use the local highway to reach them.
139. Half-an-hour's driving time should be regarded as the maximum that any driver should have to travel without the availability of fuel, refreshments, toilets and parking facilities, including parking for HGVs. It is considered that signed service areas should be sited at distances apart of approximately 30 minutes¹¹ or 14 miles (whichever is the lesser).
140. However, in determining applications for TRSAs, it will be necessary to consider the availability of existing provision nearby which, although not adequate by itself to secure traffic signs, is likely to reduce the overall demand for service facilities. In general, the aim should be to avoid the need for travellers to divert into by-passed communities to reach facilities that they require. Where there are significant barriers to developing new facilities on the trunk road and where there is a clear road safety need for services, it may be appropriate to sign traffic off to existing facilities on bypassed roads.
141. Responsibility for identifying sites, acquiring land, seeking planning permission and developing service areas rests with the private sector. To encourage the provision of services at appropriate intervals, the Highways Agency will seek to identify stretches of trunk road between settlements where there is a clear road safety need for a TRSA and will provide LPAs and developers with this information.

Facilities

142. To be signed from the SRN (see Annex A), the facilities must be:
- open at least between the hours of 8 am and 8 pm every day except Christmas Day, Boxing Day and New Year's Day;
 - limited to a single or two adjoining or interconnected premises;
 - accessed directly from on the road or directly accessible from a junction on the road;
 - the facilities must also comply with all existing and future equality legislation.

¹¹ Median average inter-peak travelling time.

143. To be signed from the SRN, the facilities must provide:

- fuel;
- hot drinks and hot food;
- adequate indoor tables and chairs to cater for expected demand (subject to a minimum provision for eight persons);
- free short-term parking (minimum two hours);
- free toilets available to all road users, together with hand-washing facilities in sufficient number to cope with demand;
- parent/carer and child facilities containing baby-changing amenities;
- access to a cash-operated telephone (card phones alone will not suffice);
- two car and caravan/motorhome/light vehicle towing trailer parking spaces.

144. The following criteria will also apply:

- Signing should normally be limited to service areas on 'A' numbered roads.
- Where services are provided on one side of the road only, signing will be limited to the nearside direction of approach unless adequate provision has been made for right-turning vehicles. Where facilities are split between two sites on opposite sides of the road, and connected by a footbridge or subway and with petrol and parking available at both sides, signing from both directions will be permissible.
- Only service areas that are accessed directly from the road or have direct access from a junction on the road can be signed. It is not acceptable to sign drivers *along* a route to remotely located facilities; the road must pass the service area. Where a service area is located at a roundabout, it will be for the traffic authority to decide on which approaches, if any, signs can be provided.
- Direct access to and egress from service areas should be provided either by diverging and merging lanes or other dedicated arrangements in accordance with Department for Transport Technical Document 41. Where flow exceeds 500 vehicles per day, then the appropriate full junction standard should be adopted – see Technical Document 42 or Technical Document 16.

145. Signs will **not** be provided:

- (a) in urban areas – subject to speed restrictions of 40 mph or less – as services are generally frequently available therein;
- (b) where discrimination would occur, ie two or more services establishments of a similar type on the same side of the road located within 1 mile of each other.

146. Operators are also encouraged to provide tourist information points.

147. Under the Licensing Act 2003, any premises that provide late-night refreshment (i.e. hot food and drink) between 11.00 pm and 5.00 am for sale to the public require appropriate permission from the local licensing authority.
148. Operators are encouraged to adopt breastfeeding-friendly policies and should consider displaying the international breastfeeding symbol prominently in their amenity buildings.

LOCAL SERVICES IN BY-PASSED COMMUNITIES

149. In order to receive signing, qualifying criteria must be met. **All** the following services must be available at least during normal shop opening hours, 9.30 am to 5.30 pm Monday to Saturday (half-day closing excepted), but excluding public holidays throughout the year:
 - (a) Adequate public parking and public toilets with hand-washing facilities (both clearly signed within the community); public cash-operated telephone; fuel; refreshments. (Where fuel is not available within the community, but is available on the main road, a special variant of the sign may be authorised by the Highways Agency).
 - (b) The community must be within 3 miles of the main (all-purpose) road from which its services would be signed, and must be the first town or village reached after leaving the road signed with the 'facilities' sign. Adequate confirmatory and return route signing must be provided.
 - (c) The community should not be so large that the provision of a full range of services would reasonably be assumed to be available by the majority of travellers. As a guide, towns with a population of over 10,000 would not normally be signed, but this figure is not to be taken as a rigid criterion.
 - (d) No equivalent (or better) roadside services are available on the main road ahead within the total detour distance plus 1 mile of the local facilities.
 - (e) No detriment to road safety, sound traffic management or local amenity should result from the encouragement of 'facilities-seeking' traffic.
 - (f) Encouragement of traffic is acceptable to the local community as a whole (to be determined by the district council).
 - (g) The cost of providing, erecting and maintaining the signs will normally be borne by local traders likely to benefit from their existence. Promoting local authorities may offer financial assistance.

TRADING FROM LAY-BYS

150. Lay-bys are provided on all-purpose trunk roads to enable motorists to stop in the course of their journey. This may be to take a brief rest, to use a mobile phone or, in the case of HGV drivers, to comply with drivers' hours regulations. However, lay-bys should not be considered substitutes for full service areas and are not satisfactory locations to rest

for more than a short period. Drivers should be encouraged to use service areas wherever these are available, using lay-bys only when stopping is an urgent necessity or where provision of services is inadequate.

151. Although lay-bys generally do not have any facilities, they are attractive to mobile traders serving refreshments to motorists. However, many lay-bys are unsuitable for this purpose, neither being large enough nor designed to standards that will accommodate the safe movement of a large number of vehicles. The availability of refreshments in lay-bys also has the potential to cause environmental and hygiene problems if traders and customers do not act in a responsible manner. Vehicle overrun damage to kerbs and verges also occurs and adjacent land may be subject to trespass.
152. Under Schedule 4 of the Local Government (Miscellaneous Provisions) Act 1982, with the Highways Agency's consent, local authorities may designate stretches of all-purpose trunk road as 'licensed streets' and issue licences to trade in lay-bys. Trading without a licence would be illegal where this provision is applied. The Highways Agency will seek to work proactively with local authorities to identify lay-bys where trading may safely be carried out.
153. It is expected that traders will be required, as a condition of being granted a licence, to provide adequate litter disposal, toilet and hand-washing facilities (that are maintained and kept clean) so as to mitigate the negative environmental and hygiene impacts of their operation. The payment for the issue of a licence is intended to be used to fund a regime of regular inspections of the operation. If facilities are not kept to the required standard or if the presence of the canteen gives rise to environmental, safety, maintenance or operational problems that cannot be resolved, traders may expect to have their licence withdrawn.
154. Licences should be granted only in circumstances where:
 - the lay-by in question is suited in terms of size and layout to accommodate anticipated demand safely;
 - there is no signed service area in close proximity;
 - the products on sale are intended to serve the immediate needs of the road user (i.e. drinks and snacks);
 - the trader undertakes to provide adequate litter disposal and toilet and hand-washing facilities;
 - the lay-by is suitable for the provision of the required facilities or will be adapted to achieve suitability prior to the operation commencing.
155. If the Highways Agency does not agree with the proposal, the local authority will not issue a licence.
156. If traders wish to provide hot food and drink between 11.00 pm and 5.00 am, they must hold appropriate permission from their local licensing authority under the 2003 Licensing Act.

157. A typical layout for a 'trading lay-by' is included in the DMRB and a copy of the drawing is attached at Annex D.

SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

158. The Highways Agency expects operators of roadside facilities to conduct business in a socially and environmentally responsible manner and to act in the best interest of their customers, staff and the wider community. Operators should encourage their customers and staff to behave in an environmentally responsible manner by providing adequate recycling litter bins where appropriate, promoting sustainable waste practices, and ensuring the premises and surrounding environment are clean, safe and secure. Customers should be able to choose from a range of healthy food options, with products sourced from local providers wherever possible.

ANNEX A: POLICY ON THE DESIGN AND USE OF TRAFFIC SIGNS TO SERVICES AND FACILITIES ON THE STRATEGIC ROAD NETWORK IN ENGLAND

A1 INTRODUCTION

- A1.1 This policy covers the provision of traffic signs to roadside facilities from the Strategic Road Network (SRN) in England. It should always be read in conjunction with the Traffic Sign Regulations and General Directions (TSRGD), S.I.2002 No. 3113, or any succeeding document.
- A1.2 In order to be lawfully placed on or near roads in England, Scotland and Wales, traffic signs must either be prescribed by the TSRGD or be specially authorised by the Secretary of State in accordance with section 65 of the Road Traffic Regulation Act 1984.
- A1.3 This document supersedes the provisions of Annex J to Roads Circular 04/94 (Revision of the TSRGD) in respect of the SRN.
- A1.4 Detailed guidance on the design and use of traffic signs can be obtained in the *Traffic Signs Manual*, which is available from The Stationery Office or on the Department for Transport (DfT) website at www.dft.gov.uk/roads/signs. Working drawings for most of the signs described in this annex are also available at this location.
- A1.5 For non-prescribed signs on the SRN or non-prescribed variants to prescribed signs on the SRN, site-specific authorisation must be sought from the Highways Agency, who will act on behalf of the Secretary of State. For other roads, authorisation must be sought from the DfT centrally.

A2 MOTORWAY SERVICE AREAS

A2.1 Traffic Signs Agreement

- A2.1.1 Provided that a proposed motorway service area (MSA) or an existing MSA seeking to upgrade its facilities meets the criteria set out by Circular 01/2008, operators will be required to enter into a Traffic Signs Agreement. Only when such an agreement has been concluded may signing to an MSA be erected on the SRN. Funding for such signing will be secured by means of an agreement under section 278 of the Highways Act 1980.

A2.2 Sign design and use

A2.2.1 Signing from motorways

A2.2.1.1 At each entry to a motorway (space permitting), there will be a sign to diagram 2918, indicating the distance to the next MSA along that motorway. It should normally follow the route confirmatory sign. This sign is not provided where the MSA is sited before the next junction. If there are no services on the motorway, or on any intersecting motorway, then diagram 2918.1 “No services on motorway” should be used.



Diagram 2918

A2.2.1.2 Only if the motorway intersects another one *before* the next MSA should a different sign, with distances to more than one MSA, be provided. This will then be a variant of diagram 2917, with only one MSA per route (up to a maximum of three routes) and *no* operators' names. A permitted variant allows the legend “No services” to be shown against a particular motorway on this sign.



Diagram 2917 variant

A2.2.1.3 On the approach to an on-line MSA, at its simplest, the signing should be as follows:

- 1 mile before a MSA, there should be a sign to diagram 2917;
- half a mile before the MSA, there should be a sign to diagram 2919.1;
- at the start of the diverge into the MSA, there should be a sign to diagram 2920.1; and
- on the exit nosing, there should be a sign to diagram 2921 or 2921.1, depending on the road layout.

No other site-specific signing is permitted, and these standard signs should not be varied, other than as permitted by the TSRGD. For example, the sign at the start of the diverge must *not* include the pictograms indicating the range of services.

A2.2.1.4 Diagram 2917 includes the distance to the next two MSAs and names the operators. Where only one motorway route is shown, the motorway number should be omitted. However, other MSAs reached on other routes can be included if they are the next but one MSA when following a particular route. Where appropriate, “No services” can be substituted next to the motorway number in place of the operator’s name and distance. No more than three motorway routes should be indicated on this sign. Where the sign is located on a motorway of four lanes or more, it may be sensible to vary the distance to 2 miles. The results of an independent inspection scheme may also be displayed on this sign.



Diagram 2917 – single route

A2.2.1.5 Diagram 2919.1 includes provision for the addition of a header board displaying the operator’s name and logo in their house style. Height restrictions apply to this header board, and the width is governed by the width of the main sign below when designed in accordance with the normal design rules. It is not permitted to alter the layout of the main sign to increase the overall width. All lettering on the header board must at least as large as the transport alphabet used on the main sign. Where the petrol price panel is included, the numerals should be the size shown on the DfT working drawings and the display panel should be remote-operated. Where the petrol price panel is omitted, the white petrol pump symbol should be added to the beginning of the top row of symbols. Where the sign is located on a motorway of four lanes or more, it may be sensible to vary the distance to 1½ miles.

A2.2.1.6 All MSAs are required to meet the strict requirements for disabled access laid down in primary legislation; therefore signs to diagram 2919.1 will no longer display the symbol indicating that the MSA is accessible to disabled users. The omission of this symbol has been authorised until such time as it is prescribed. Where appropriate, a symbol denoting the availability of a picnic area (shown on diagram 2305) may be used in its place.



Diagram 2919.1

A2.2.1.7 Diagram 2920.1 also includes provision for the addition of an operator's header board. As with diagram 2919.1, height restrictions apply to this header board, and the width is governed by the width of the main sign below when designed in accordance with the normal design rules. It is not permitted to alter the layout of the main sign to increase the overall width. All lettering on the header board must be at least as large as the transport alphabet used on the main sign.



Diagram 2920.1

A2.2.1.8 On the diverge nosing at the entrance to a MSA, there will normally be a sign to diagram 2921.1. Exceptionally, diagram 2921 might be appropriate. It is not permitted to vary these signs in any way, i.e. neither a header board nor symbols should be included.

A2.2.1.9 Where the MSA is at a standard junction, the 1 mile sign is replaced by one at 2 miles, the half-mile sign is replaced by one at 1½ miles, and the word “Services” is added below the route number on the standard nose-exit sign to diagram 2910 (with a five-stroke width vertical space between the exit route number and “Services”). Where possible, the destination “Services” should be added to the standard directional signing approaching the junction. However, where this would lead to overload on these signs, a separate sign to diagram 2920.1 should be provided between the half-mile and final ADSs. This should be sited at least 200 metres, and more if possible, from any other directional signing.

A2.2.1.10 Where the access to an MSA is from a non-motorway route, continuity signing should be provided by means of diagrams 2311.1 and 2311.2, as appropriate. The geographical name may be omitted from these signs, in which case “services” should be varied to “Services”.

A2.2.1.11 In the unlikely event that the MSA is some distance from the motorway, the distances given on the motorway signing should be those to the turn-off for the MSA. It is important not to give the overall distance to the MSA, as this could mislead drivers into passing the junction, seeking a later turn-off for the MSA.

A2.2.2 *Signing from all-purpose roads*

A2.2.2.1 The TSRGD now prescribes signs for use on non-motorway roads approaching a local road from which a named MSA is accessed. These indicate the distance and, where required, the direction. Like motorway signs, these are blue background signs with white lettering, but unlike motorway signs they may *not* include either header boards or petrol price panels.

A2.2.2.2 On the approach, a sign to diagram 2310.1 should be used. Signs to diagram 2310.1 must include the geographical name as well as the word “services”. This sign is normally provided at half mile, but, where this would interfere with standard directional signing, other distances may be shown. Permitted variants are set out in Schedule 16, item 8, to the TSRGD, and the maximum distance is 2 miles. Note that, unlike the motorway sign to diagram 2919.1, this sign may *not* include a panel showing the price of unleaded petrol. As with signs to diagram 2919.1, signs to diagram 2310.1 will no longer display the symbol indicating that the MSA is accessible to the disabled. The omission of this symbol has been authorised until such time as it is prescribed. On non-trunk roads authorisation for this change is required from DfT. Where appropriate a symbol denoting the availability of a picnic area (shown on diagram 2305) may be used in its place.



Diagram 2310.1

A2.2.2.3 Continuity signing should be provided in the form of signs to diagram 2311.1 and 2311.2 as appropriate. Alternatively, Schedule 16, item 35 lists those standard directional signs to which a blue panel with the legend “Services” may be added. “Services” may be varied to a geographical name and “services”.



Diagram 2311.1



Diagram 2311.2

A2.2.2.4 Signs to diagram 2330 may be used on all-purpose roads to indicate that there are no services available on a motorway.

A2.2.2.5 Alternatively, signs to diagram 2917 (without operators’ names) may be placed on all-purpose roads near a motorway. They can be particularly helpful on the approaches to a motorway junction, where the distance to the first MSA along one or all of the motorway routes accessed from the junction is greater than drivers would reasonably expect.

A2.3 Financial arrangements

A2.3.1 Signs to diagrams 2917, 2918 and 2921/ 2921.1 should be erected and maintained at the Highways Agency’s expense and will remain the property of the Highways Agency.

- A2.3.2 The faces of diagram 2919.1, diagram 2920.1 and diagram 2310.1 signs must be paid for by the MSA operator and will remain their property and responsibility. The support posts, safety fences and any lighting are the Highways Agency's responsibility but shall be funded by the MSA operator. The MSA operator will pay for any surveys by the Highways Agency's Regional Office to determine the work necessary for the erection of the diagram 2919.1 sign, including in relation to cabling for any remote control of the petrol price display.
- A2.3.3 For signs to diagrams 2919.1 and 2920.1, a commuted sum should be charged to recover costs incurred in maintenance that will be the responsibility of the Highways Agency. This sum should include an allowance for administration and maintenance. The operator should be given an estimate of the costs and be asked to pay in advance. The costs of future replacement of these signs must also be borne by the MSA operator. It will be acceptable for an MSA operator to arrange the manufacture and erection of these signs, provided their contractor is approved by the Highways Agency for working on the motorway and that written agreement from the Highways Agency's Regional Office is provided in advance for the work to be done. For those signs for which the MSA operator is responsible, the operator must sign a Traffic Signs Agreement.
- A2.3.4 All other MSA signs are the financial responsibility of the Highways Agency, which will meet all maintenance and replacement costs. However, where an MSA operator changes its operating name, any costs associated with changes to signs for which the Highways Agency is responsible will be met by the MSA operator provided no other changes are needed to the signs. Operators will also be required to submit a revised signing agreement to reflect changes to the sign permitted. Where changes are required to existing signs to reflect the opening of a new MSA, this cost must be met by the operator of the new facility.

A3 MOTORWAY REST AREAS

A3.1 Traffic Signs Agreement

- A3.1.1 Provided that a proposed motorway rest area meets the criteria set out in Circular 01/2008, operators will be required to enter into a Traffic Signs Agreement. Only when such an agreement has been concluded may signing to a rest area be erected on the trunk road network. This applies to all of the SRN. Funding for such signing will be secured by means of an agreement under section 278 of the Highways Act 1980.
- A3.1.2 Because they do not provide all of the facilities of an MSA (in particular, fuel may not be available) rest areas will *not* be included on any advance direction signs (ADS) to diagram 2917 or standard signs to diagram 2918 at motorway entries.

A3.2 Sign design and use

A3.2.1 Signing from motorways

A3.2.1.1 On the approach to an on-line rest area, the signing should be as follows:

- One mile before a rest area, there should be a sign to diagram NP2918.2 (non-prescribed sign). In some circumstances, it may be appropriate to vary the distance on this sign.



Non-prescribed sign NP2918.2

- Half a mile before the rest area, there should be a sign to diagram NP2919.3 (non-prescribed sign) indicating the facilities available at the rest area.



Non-prescribed sign NP2919.3

- This diagram does *not* include provision for a header board to be added. However, it should include the name of the rest area to help driver identification.
 - The pump, LPG fuel, and "i" symbols may be omitted as appropriate. The spoon and fork symbol (denoting restaurant facilities) may be substituted for the cup symbol. The remaining facilities may be shown on a single row.
 - Where a lodge is provided at a rest area, its availability may be indicated by the inclusion of a bed symbol on this diagram. The bed symbol should be shown after the symbols illustrated above.
- At the start of the diverge into the rest area, there should be a sign to diagram NP2920.2 (non-prescribed sign).



Non-prescribed sign NP2920.2

- On the exit nosing, there should be a sign to diagram NP2921.2 or NP2921.3 (non-prescribed signs), depending on the road layout.



Non-prescribed sign NP2921.2



Non-prescribed sign NP2921.3

No other site-specific signing is permitted, and these standard signs should not be varied.

A3.2.2 Rest areas at junctions

- A3.2.2.1 Where a rest area is located at a motorway junction and the same slip roads are being used by other traffic, special arrangements should be followed to avoid a conflict between the rest area signs and the standard advance direction sign on the approach to the junction.
- A3.2.2.2 Where the rest area is at a standard junction, the 1 mile sign (on diagram NP2918.2 non-prescribed sign) is replaced by one at 2 miles in advance of the junction exit and the half-mile sign (diagram NP 2919.3 non prescribed sign) is replaced by one at 1½ miles. The distances on both signs are changed accordingly.
- A3.2.2.3 At the junction, a nose exit sign to diagram NP2910.2 (non-prescribed sign), which has the words “Rest area” added below the route number on the standard nose-exit sign (with a five-stroke width vertical space between the exit route number and “Rest area”).



Non-prescribed sign NP2910.2

- A3.2.2.4 A sign to diagram NP2920.2 (non-prescribed sign), should be provided between the half-mile and final advanced direction sign for the ordinary junction signing. It should be sited at least 200 metres, and more if possible, from any other directional sign. Once on the slip road and on the route to the services, continuity signing using the legend “Rest area” should be provided to direct drivers. These signs should be white on blue throughout, irrespective of the status of the road. Where appropriate, they may be integrated into the advance direction signs.
- A3.2.2.5 Where the access to a rest area is from a non-motorway route, continuity signing should be provided by means of diagrams NP2311.3 and NP2311.4 (non-prescribed signs), as appropriate. The geographical name may be omitted from these signs, in which case “rest area” should be varied to “Rest area”.



Non-prescribed sign NP2311.3



Non-prescribed sign NP2311.4

A3.2.3 Signing from all-purpose roads

- A3.2.3.1 Non-prescribed signs may be used on non-motorway roads approaching a local road from which a named rest area is accessed. These indicate the distance and, where required, the direction. Like motorway signs, these are blue background signs with white lettering.
- A3.2.3.2 On the approach, a sign to diagram NP2310.2 (non-prescribed sign) should be used and must include the geographical name as well as the words “rest area”. This sign is normally provided at half-mile, but, where this would interfere with standard directional signing, other distances may be shown. The symbols may be varied as appropriate to the facilities available at the rest area and the maximum distance is 2 miles.



Non-prescribed sign NP2310.2

- A3.2.3.3 Continuity signing should be provided in the form of signs to diagram NP2311.3 and NP2311.4 (non-prescribed signs) as appropriate.
- A3.2.3.4 Alternatively, the words “Rest area” may be added to those standard direction signs identified in Schedule 16, item 35 as being signs to which a blue panel with the legend “Services” may be added. However, such variations are non-prescribed and authorisation will be required. “Rest area” may be varied to a geographical name and “rest area”. On non-trunk roads, authorisation for this is required from DfT.

A3.3 Financial arrangements

- A3.3.1 Signs to diagram NP2918.2 (non-prescribed sign) should be erected and maintained at the Highways Agency’s expense and will remain the property of the Highways Agency.
- A3.3.2 The faces of diagram NP2919.3 and diagram NP2310.2 signs (non-prescribed signs) must be paid for by the rest area operator and will remain their property and responsibility. The support posts, safety fences and any lighting are the Highways Agency’s responsibility. The rest area operator must also pay for signs to diagram NP2920.2 (non-prescribed sign), but they will be the property of the Highways Agency, who will bear the maintenance costs. The rest area operator will pay for any surveys by the Highways Agency’s Regional Office to determine the work necessary for the erection of the signs to diagram NP2919.3 (non-prescribed sign).

- A3.3.3 For signs to diagrams NP2919.3 and NP2920.2 (non-prescribed signs), a commuted sum should be charged to recover costs incurred. This should include an allowance for administration and maintenance. The operator should be given an estimate of the costs and be asked to pay in advance. The costs of future replacement of these signs must also be borne by the rest-area operator. It will be acceptable for a rest-area operator to arrange the manufacture and erection of these signs, provided their contractor is approved by the Highways Agency for working on the motorway and that written agreement from the Highways Agency's Regional Office is obtained in advance for the work to be done. For those signs for which the rest-area operator is responsible, the operator must sign an Operating Agreement covering the maintenance and replacement.
- A3.3.4 All other rest-area signs are the financial responsibility of the Highways Agency, which will meet all maintenance and replacement costs.

A4 MOTORWAY TRUCKSTOPS

A4.1 Traffic Signs Agreement

- A4.1.1 Since the introduction of the 2002 TSRGD, it has been possible to sign various HGV destinations and routes from motorways using diagram 2929.1. Now, subject to the standards laid out in Circular 01/2008 being met, specialist HGV facilities (generally known as truckstops) can receive signing more akin to standard MSA signing. In light of this change, a non-prescribed sign design has been developed that requires site-specific authorisation.
- A4.1.2 Provided that a truckstop meets the criteria set out in the main body of Circular 01/2008, operators will be required to enter into a Traffic Signs Agreement. Only when such an agreement has been concluded may signing to a truckstop be erected on the SRN. Funding for truckstop signs, as for MSA signs, should be secured by means of an agreement under section 278 of the Highways Act 1980.

A4.2 Sign design and use

- A4.2.1 Truckstops are generally located on the local road network adjacent to a motorway junction. The sequence of signing, therefore, should be as follows:
- One and a half miles before the junction from which the truckstop can be accessed, there should be a sign to diagram NP 2919.2 (non-prescribed sign) indicating the distance to the junction. It is important that it is this distance, rather than the overall distance to the truckstop, that is given, or drivers might pass the turn-off, believing that there was an access further along the motorway. This sign is, as yet, non-prescribed, and must be authorised on a site-specific basis. It is similar in appearance to other services signing,

but, in keeping with the standard convention for HGV route signing, it has a black background with white lettering. No header board is permitted.



Non-prescribed sign NP2919.2

- Between the half-mile and final ADSs for the junction, there should be a sign to diagram 2929, with legend “Puddleworth truckstop” and an inclined arrow. This is a permitted variant of the prescribed sign and does not require site-specific authorisation.



Diagram 2929 for truckstop

- On the motorway slip road, signing may be provided either by a further variant of diagram 2929, or by incorporating a black panel into the standard directional signing. Again, this is permitted by the TSRGD.

A4.2.5 Continuity signing on local roads should be provided either by means of signs to diagrams 2805, 2806 and/or 2806.1, varied as necessary, or by adding black panels to standard directional signing. This, too, is permitted by TSRGD.

A4.3 Financial arrangements for truck stops signed from the motorway

A4.3.1 All signs should be erected and maintained at the operator’s expense, but will remain the property of the Highways Agency.

A4.3.2 Where sites do not comply with policy, the operator of the site will be responsible for the costs of removing any signs.

A5 SERVICE AREAS ON ALL-PURPOSE ROADS

A5.1 Traffic Signs Agreement

A5.1.1 Provided that a proposed service area or an existing service area seeking to upgrade its facilities meets the criteria set out by Circular 01/2008, operators will be required to enter into a Traffic Signs Agreement. Only

when such an agreement has been concluded may signing to an all-purpose trunk road service area be erected on the SRN. Funding for such signing will be secured by means of an agreement under section 278 of the Highways Act 1980.

A5.2 Sign design and use

A5.2.1 The TSRGD 2002 introduced a new signing regime for service areas on all-purpose roads. Black and white signs are now prescribed for all service areas other than named MSAs. A deadline of 1 January 2015 has been set for replacing existing green background signs on primary routes.

A5.2.2 In advance of services that are open 24 hours of those days required by the eligibility criteria (laid down in paragraphs 144 and 145 in the main body of this policy), a sign to diagram 2313.1 may be provided. The normal distance is half a mile, but, where this would interfere with standard directional signing, this may be varied in accordance with Schedule 16, item 8. "Services" may be varied to a geographical name and "services". Symbols should be varied according to available facilities, but should always be used in the order shown on the drawings, and must always include the WC, petrol pump and cup or fork and spoon (but not both). If LPG fuel is available, the symbol should be placed after the petrol pump. The "i" symbol may be omitted if no tourist information is available and the bed symbol may be added.



Diagram 2313.1



Diagram 2313.1 variant

A5.2.3 Where services are not open 24 hours, the advance signing should be to diagram 2313.3. The lower panel may read either "not 24 hrs" or "Fuel only 24 hrs" as appropriate. Additionally, the same permitted variants apply as for diagram 2313.1.



Diagram 2313.3

- A5.2.4 Where services are not open to HGVs, the advance signing should be to diagram 2313.5, with the lorry symbol varied to the lorry symbol with the red bar through it, and the words “Lorries only” omitted. Again, the same permitted variants apply as to diagram 2313.1.



Diagram 2313.5 – no HGVs

- A5.2.5 Where required, final advance direction signs to service areas should be designed to diagrams 2313.2, 2313.4 or 2313.6 as appropriate. These signs may also include the range of symbols shown on the half-mile advance direction signs, and the symbols should be the same on both signs. Signs of this type, incorporating symbols, should only be used where drivers are required to turn off the main road in order to reach services accessed from a minor road. They should not be used as final signs at the entrance to a service area.

- A5.2.6 At the entrance to the service area itself, either diagram 2314.1 or diagram 2314.2 should be used, as appropriate for the road layout. Signs to diagram 2314.2 may also be used at slip road nosings. The direction to a service area may also be indicated by adding the destination “Services” to standard directional signing, either directly in the case of non-primary route signs, or in a panel in the case of green primary route signs. Schedule 16, item 35 indicates those sign diagrams to which this permitted variant applies.



Diagram 2314.1



Diagram 2314.2

A5.3 Financial arrangements

- A5.3.1 All signs should be erected and maintained at the operator’s expense but will remain the property of the Highways Agency.

A6 TRUCKSTOPS ON ALL-PURPOSE ROADS

A6.1 Traffic Signs Agreement

- A6.1.1 Provided that a facility meets the criteria set out in the main body of Circular 01/2008, operators will be required to enter into a Traffic Signs Agreement. Only when such an agreement has been concluded may signing to a truckstop be erected on the SRN. Funding for truckstop signs, as for MSA signs, should be secured by means of an agreement under section 278 of the Highways Act 1980.

A6.2 Full standard services – sign design and use

- A6.2.1 Fully qualifying services that cater only for HGVs should be signed in advance using diagram 2313.5, with symbols varied as appropriate.



Diagram 2313.5

- A6.2.2 Where required, final advance direction signs to lorry only service areas should be designed to diagram 2313.6, varied to omit the lorry with the red diagonal line and add the lorry symbol plus “Lorries only”. These signs may also include the range of symbols shown on the half-mile advance direction signs, and the symbols should be the same on both signs. Signs of this type, incorporating symbols, should only be used where drivers are required to turn off the main road in order to reach services accessed from a minor road. They should not be used as final signs at the entrance to a service area.



Diagram 2313.6 – lorries only

- A6.2.3 At the entrance to the service area itself, either diagram 2314.1 or diagram 2314.2 should be used, as appropriate for the road layout. Signs to diagram 2314.2 may also be used at slip road nosings. The direction to a service area may also be indicated by adding the destination “Services” to standard directional signing, either directly in the case of non-primary route signs, or in a panel in the case of green primary route signs. Schedule 16, item 35, indicates those sign diagrams to which this permitted variant applies.

A6.3 Special lorry facilities

A6.3.1 Where facilities are provided for HGVs, but do not meet the signing criteria for all-purpose road services, variants of diagrams 2502, 2505 and 2507 may be used on all-purpose roads. It is for the route manager to decide whether signing is appropriate. However, an HGV driver should not be expected to follow such signs unless overnight parking is available.

A6.3.2 The signs would include the blue “P” symbol plus the black lorry symbol on a white background, with no legend, and certain other permitted symbols where appropriate.



Diagram 2502



Diagram 2505



Diagram 2507

6.4 Financial arrangements

A6.4.1 All signs should be erected and maintained at the operator’s expense but will remain the property of the Highways Agency.

7 LOCAL FACILITIES IN OFF-LINE COMMUNITIES

7.1 Restrictions on use

A7.1.1 These signs are for use where a range of basic services are available in a small town or village lying off the main road, which will often but not necessarily be a purpose-built bypass. These signs are *not* to be used on motorways. Neither are they to be used for towns or cities large enough for the traveller to assume that a full range of services is available (see paragraphs 151 and 152 of main policy body).

7.2 Sign design and use

A7.2.1 Advance signing to local facilities should be by means of diagram 2308.1. This sign should be positioned so as to avoid last minute manoeuvring by drivers.



Diagram 2308.1

- A7.2.2 The WC, petrol pump and cup symbols should appear on all signs, as these represent the minimum qualifying criteria for signing. The spoon and fork (denoting a restaurant), bed or tourist information “i” symbol shall be omitted where these facilities are not provided.
- A7.2.3 Tourist attraction and camping site/caravan park symbols should **not** be added, as these would make the sign too complicated. These are tourist facilities and should be signed separately in accordance with TD 52/04.
- A7.2.4 Normally, drivers will be able to obtain the name of the community shown on the local facilities sign from the standard directional signing at the junction and on the continuation of the route. However, a flag-type sign to diagram 2309.1 is prescribed for use at any junction on the route where the existing local directional signing is not adequate.



Diagram 2309.1

A8 LAY-BYS

- A8.1 Lay-bys are an essential element in highway design, giving frequent opportunities for drivers of all types of vehicle to take a short break. Lay-bys are signed by means of an advance sign to diagram 2501, plus a sign at the start of the lay-by to diagram 801.



Diagram 2501



Diagram 801

- A8.2 Where there is a WC and/or telephone in a lay-by, advance signing should be to diagram 2502. The “i” symbol, indicating general information not associated with tourist attractions, may be added. This sign may also be used to indicate a parking area reserved for commercial vehicles, by incorporating the lorry symbol (see paragraph 6.3.2)



Diagram 2502 variants

ANNEX B: STANDARDS FOR PARKING AT MOTORWAY SERVICE AREAS AND MOTORWAY REST AREAS

The calculations below set out the requirements for MSAs. The requirement in respect of facilities for MRAs will be half that required for MSAs, and rounded to the higher number where clear division can not be made.

	Calculation ¹²	Variable	Notes
Traffic flow (vehicles per day)¹³			
Light vehicle		A	Advice on traffic flows is available from the Highways Agency
HGV and coach		B	
No. of parking spaces required¹⁴			
Cars	0.5% of A	C	
HGV	0.5% of B	D	
Abnormal load	Minimum of 1		
Coach	0.1% of B	E	
Coach interchange ¹⁵	No. of bays provided	E1	
Caravan/ motorhome/ vehicle & trailer	0.015% of A	F	
Motorcycle	0.015% of A (where the percentage falls below 10 a minimum of 10 should be provided)	G	Dedicated motorcycle bays for securing bikes
Additional spaces for lodges	One space per 2 bedrooms		

¹² The Highways Agency's Spatial Planning Team can assist with these calculations.

¹³ Where the necessary information exists operators may wish to increase the number of parking spaces for particular types of vehicle to recognise the particular demographics of the road served by the facility.

¹⁴ Parking for disabled travellers should be clearly signed at the entrance to the MSA.

¹⁵ Where such a facility has been permitted.

No. of parking spaces required continued

Spaces for disabled users	5% of C (where the percentage falls below 5 a minute, 5 should be provided)	
Spaces for disabled users caravan/motorhome/ vehicle and trailer	5% of F (where the percentage falls below 2 a minute, 2 should be provided)	Located adjacent to the front entrance
Spaces for disabled lodge users	5% of F (where the percentage falls below 2 a minute, 2 should be provided)	

ANNEX C: STANDARDS FOR TOILETS AT MOTORWAY SERVICE AREAS AND MOTORWAY REST AREAS

The calculations below set out the requirements for MSAs. The requirement in respect of facilities for MRAs will be half that required for MSAs, and rounded to the higher number where clear division can not be made. The variables used are the same as those used in Annex B.

No. of passengers requiring use of toilets		
Light vehicles	$2.3 \times (C+F)$	H
HGV	$1.2 \times D$	I
Coach	$30 \times (E + E1)$	J
Total	$H + I + J$	K

No. of toilets required		
Average length of toilet use	3 minutes	
Hourly turnover	$60 \div 3 = 20$	
No. of toilets required	$K \div 20 =$	L
Distribution of toilets and parent/ carer and child room		
Female	$60\% \text{ of } L =$ (minimum of 10)	M
Female and child room	minimum of 2	Located within the female toilet block
Female disabled users	$5\% \text{ of } M =$ (minimum of 2)	
Male	$40\% \text{ of } L$ Minimum of 10	Two-thirds urinals, one-third WCs
Male and child room Male disabled user	Minimum of 2 Minimum of N	Located within the male toilet block
Disabled user independent unit	Minimum of 1	Independent unit to allow for male/female access

Dedicated facilities for lorry drivers

Male toilets	1% of I (minimum 2)
Female toilets	1% of I (minimum 2)
Independent disabled user	Minimum of 1
Male showers	Minimum of 2
Female showers	Minimum of 2
Independent disabled user shower	Minimum of 1

GLOSSARY

ADS	Advance direction signs
AONB	Area of Outstanding Natural Beauty
APTR	All-purpose trunk roads
DfT	Department for Transport
DMRB	Design Manual for Roads and Bridges and any subsequent revision.
HGV	Heavy goods vehicle
LPA	Local Planning Authority
MRA	Motorway rest area
MSA	Motorway service area
SRN	Strategic Road Network – network of trunk roads, including motorways, for which the Secretary of State for Transport is the highway authority
SSSI	Site of Special Scientific Interest
TRSA	Trunk road service area
TSRGD	Traffic Signs Regulations and General Directions

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APPENDIX 4

The Office of the Deputy Prime Ministers decision letter dated 16 August 2002 concerning the proposed MSA at Hucclecote / Brockworth at Jct 11A of M5.



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Our Ref: APP/G1630/A/00/1051926

16 August 2002

Dear Sir

**TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 78
APPEAL BY BRYANT (CENTRAL) LTD
PROPOSED MOTORWAY/TRUNK ROAD SERVICE, PARK & RIDE AND UPGRADING OF
JUNCTION 11A, AT M5/A417 JUNCTION, HUCCLECOTE/ BROCKWORTH,
GLOUCESTERSHIRE**

1. I am directed by the First Secretary of State to say that consideration has been given to the report of the Inspector, Mr J S Nixon, BSc (Hons) DipTE, Ceng, MICE, MIHT, MRTPI, who held a public local inquiry into your clients' appeal against the failure of Tewkesbury Borough Council to determine the application, dated 22 October 1997, for a Motorway Service Area (MSA), Trunk Road Service Area (TRSA), Park & Ride (P&R) facility and an all movements junction (AMJ) on land near to the Junction 11A/A417 interchange, Hucclecote and Brockworth, Gloucestershire.

2. The Inspector, whose conclusions are reproduced in the annex to this letter, recommended that planning permission be refused. A copy of his report is enclosed. All references to paragraph numbers, unless otherwise stated, are to that report.

Preliminary Matters

3. The Secretary of State notes the All Movements Junction (AMJ) proposal was withdrawn. He agrees with the Inspector's conclusion that this is a matter that could be looked at separately and the appeal proposals should be appraised as if the AMJ would be forthcoming [16.9].

4. The Secretary of State has received a further representation since the inquiry, a copy of which is enclosed. This correspondence has been taken into account by the Secretary of State in determining the appeal but it is not considered to raise any matters requiring further reference back to the inquiry parties, either under Rule 17 of the Town and Country Planning (Inquiries Procedure) (England) Rules 2000 or in the interests of natural justice, prior to



INVESTOR IN PEOPLE

making his decision.

Policy Considerations

5. Section 54A of the Town and Country Planning Act 1990 requires that proposals shall be determined in accordance with the development plan unless material considerations indicate otherwise. In this case the development plan is the Gloucestershire Structure Plan (Second Review – November 1999). The Secretary of State has also taken into account the relevant policies from the Tewkesbury Borough Council Revised Deposit Draft Local Plan; Planning Policy Guidance note 2: Green Belts (PPG2); Planning Policy Guidance note 13: *Transport* (PPG13); the MSA policy statement of July 1998 (The Lord Whitty Statement), and all other material considerations.

6. The Secretary of State notes that an Environmental Statement was submitted to support your clients' application. This has been taken into consideration by the Inspector and taken into account by the Secretary of State in reaching the decision on the application.

Consideration

7. The Secretary of State considers that the main issue is whether the development is appropriate development in the Green Belt and, if not, whether very special circumstances, in particular the evidence of need, exist to justify inappropriate development.

Green Belt

8. The Secretary of State agrees with the Inspector that the starting point should be assessment against Green Belt policies [16.12] and that the different parts of the proposal should be considered separately [16.13]. He agrees with the Inspector that the proposed MSA/TRSA would be inappropriate development in the Green Belt [16.160]. He agrees that the scale of development associated with an MSA would seriously compromise the purposes of including land in the Green Belt and in particular the openness and maintaining separation between settlements as highlighted in the Structure Plan. On the P&R facility, the Secretary of State agrees with the Inspector that the five criteria of PPG13 (Annex E) have not been met, and consequently the P&R facility would not be appropriate development in the Green Belt [16.130 & 16.159].

9. The Secretary of State also agrees that the appeal site still remains a crucial element in fulfilling Green Belt functions and is a valuable link in the visual separation between the main urban areas of Gloucester and Cheltenham. [16.20-16.23].

10. The Secretary of State agrees with the Inspector's conclusion that "the proposal is contrary to the provisions of the development plan and the emerging Local Plan" [16.25].

11. The Secretary of State notes the Inspector's view that very special circumstances should not be considered in this case [16.18], because of the wording of Policy GB1 in the Gloucestershire Structure Plan (Second Review – November 1999). However, the Secretary of State is of the opinion that, although the development plan is the starting point for consideration of the appeal, the requirements of PPG2 are still an important material consideration. Consequently, the Secretary of State has considered not only whether there are any material considerations, such as the need for the development, which are sufficiently strong to outweigh the presumption in favour of the development plan but also whether these

considerations constitute very special circumstances in terms of PPG2.

Need for a MSA/TRSA

12. The Secretary of State notes that Government policy as outlined in Lord Whitty's statement is that "Planning permission for infill MSAs between "thirty mile" sites should be granted only exceptionally and where a clear and compelling need and safety case for the MSA has been established". The Secretary of State does not agree with the Inspector [16.30] that, when faced with a compelling need and safety argument for an infill MSA, it is for the local planning authority to meet the identified requirement, preferably through the LTP and development plan. The Secretary of State recognises that local authorities are encouraged to consider specific proposals involving development of land in their LTPs and development plans. He considers, however, that it is primarily for developers themselves to identify sites for new MSAs and for local planning authorities to assess such proposals as may then come forward against the criteria set out in Lord Whitty's statement and any other relevant considerations.

13. The Secretary of State agrees with the Inspector's summary of the need argument for an infill MSA [16.83-85]. The Secretary of State considers that the evidence has not demonstrated a clear and compelling need and safety case on this stretch of the M5. In addition, he agrees that, although the arguments in favour of the TRSA are marginally stronger than for the MSA, they are not compelling in their own right [16.104].

14. While the Secretary of State has considered the potential for extension and improvement and upgrading of the signing and access of neighbouring MSAs in this case, he does not agree with the Inspector [16.160] that the need to do so is implicit in the Lord Whitty Statement. Nevertheless, the Secretary of State agrees with the Inspector's conclusion that the position on this stretch of the M5 does not constitute the exceptional circumstances demanded by the Lord Whitty statement to justify an infill MSA [16.85].

15. The Secretary of State agrees with the Inspector's view that turn in rates would be likely to be low due to the off-line location of the proposed MSA [16.86]. The Secretary of State also agrees that in terms of environmental cost, this particular site was not bettered by any alternative sites in the locality for servicing both motorway and trunk road traffic [16.106]. However, the Secretary of State does not consider that this factor provides sufficient weight to outweigh the harm identified in the absence of a strong need argument.

Need for a P&R Facility

16. The Secretary of State agrees with the Inspector's conclusions, with regard to the siting of a P&R facility on the site, that not all of the five criteria in Annex E of PPG13 have been met [16.130]. As such, the proposal is inappropriate in a Green Belt location. Similarly, the Secretary of State agrees that very special circumstances, to outweigh the presumption against inappropriate development in the Green Belt, were not identified [16.130]. The Secretary of State notes that the Inspector considers it would be prudent for the Secretary of State to clarify the position with regards to Tewkesbury Borough Council's and Gloucester City Council's preferred P&R strategy [16.116]. However, the Secretary of State does not consider that this issue is of sufficient weight to affect the outcome of this appeal and he does not consider that it is necessary for him to clarify the situation.

Other Material Considerations

17. The Secretary of State agrees with the Inspector's conclusions on landscape arguments [16.135], noise [16.136], lighting [16.137], air pollution [16.138], drainage [16.139], and the other matters raised [16.140-143]. The Secretary of State also agree with the Inspector's views on the Section 106 Obligation [16.145-147], but does not consider that clarification of any part of the Obligation is required at this time [16.146].

Conclusions

18. The Inspector considered that both the MSA/TRSA and the P&R facility were inappropriate development in the Green Belt and so were contrary to the development plan. Consequently, he considered whether other material considerations outweighed the plan led conclusion. The Secretary of State has also considered whether the arguments in favour of the development would amount to very special circumstances in terms of PPG2.

19. Accordingly, the Secretary of State agrees with the Inspector that permission should be refused [16.167]. None of the issues raised amounts to the very special circumstances that would be required to justify this inappropriate development in the Green Belt. Nor are they material considerations sufficient to outweigh the plan led conclusions.

Formal Decision

20. For the reasons given above, the First Secretary of State accepts the Inspector's recommendation. He hereby dismisses your clients' appeal and refuses planning permission for the development of a Motorway Service Area, Trunk Road Service Area and Park & Ride facility on land near to the Junction 11A/A417 interchange, Brockworth, Gloucestershire.

Right to challenge the decision

21. A separate note is attached setting out the circumstances in which the validity of the Secretary of State's decision may be challenged by making an application to the High Court within six weeks from the date of this letter.

22. A copy of this letter has been sent to Tewkesbury Borough Council and all those who appeared at the Inquiry.

Yours faithfully



Miss A Gerry

Authorised by the First Secretary of State to sign in that behalf

16. INSPECTOR'S APPRAISAL AND CONCLUSIONS

- 16.1 My appraisal and conclusions take into account all the evidence presented to the inquiry, what I have read in the Environmental Statement, including the supplementary information, the submissions and the written representations proffered both when the planning application was considered by Tewkesbury Borough Council (BC) and in response to the inquiry advertisement. They take into account, also, my inspections of the appeal site and its surroundings, including the extended highway network and other MSAs.
- 16.2 First, I have clarified the position over the all movements' junction (AMJ) proposal at Jn 11A of the M5. Secondly, I set out what I see as the material considerations and proceed to address each in turn. Next, I have considered the Section 106 Agreement ^(Document 8) submitted by Bryant (Central) Ltd (BCL – the appellants) in support of the application and draft conditions ^(Document 9) submitted by both Tewkesbury BC and BCL and discussed at the Inquiry. Finally, I have drawn together my conclusions into a brief summary to reach an overall conclusion and recommendation. The facts and arguments employed in my appraisal have been drawn from the cases presented by the parties and the references in square brackets following the sub-headings or at the end of paragraphs indicate from where these have been taken.

The Proposal for an All Movements Junction (AMJ) at Jn 11A, M5 Motorway [1.2, 3.12, 7.13, 7.16, 8.85, 9.6, 9.8, 9.32, 9.35, 9.54, 11.67-1168, 12.1, 12.33, 13.8, 15.7, 15.12-15.13]

- 16.3 The AMJ proposal was included as part of the application and of the appeal process until mid-way through the inquiry. The parties produced evidence and a different view as to the proposal's acceptability reached by the Highways Agency (HA) and BCL. It was clear that the arguments would be complex and from an early stage, and certainly at the Pre Inquiry Meeting, the HA expressed concern about this topic being dealt with at a planning inquiry. The HA expressed the strong view that the merits of the AMJ proposal should be evaluated in the forum applicable when application is made for the necessary Side Roads Orders. As a consequence, BCL and the HA have agreed a position statement ^(Document 23), which has the effect of withdrawing the AMJ facet of the appeal. If accepted the technical and theological highway debates would be deferred until the necessary Special Road Orders are promoted. It was suggested that at that time formal planning permission might not be required.
- 16.4 The parties agreed to proceed along these lines on a without prejudice basis, though there were some rumblings about the implications of postponing the deliberations on this matter to the later date. For my part, I accept that the AMJ element could be covered by a Grampian type condition, requiring the work to be undertaken/ completed before commencement or opening of the MSA/TRSA. Unlike some, I anticipate that planning permission would be needed, as the work would fall within the definitions of development contained in the Act. However, if this was contested then it could be decided when the Special Road Orders are promoted.
- 16.5 In the context of the MSA/TRSA, this would seem an acceptable arrangement, though I would have preferred all the planning matters to be considered at one time. My

- experience is that a planning permission for a land use, granted subject to a Grampian condition, such as that suggested here, can put pressure on the responsible authority to accept a lower standard or 'compromise' when the outstanding matter comes up for consideration.
- 16.6 However, perhaps of more importance, the HA sees the approval for the AMJ possibly taking up to 10-years to secure. Put another way, the implementation of proposals for the MSA/TRSA granted planning permission now could be delayed for up to 10-years. One consequence of this is that, if now or within that 10-year period there is a compelling need for further services on this stretch of the M5 or A417/A40, an extant planning permission for the project at Hucclecote/ Brockworth would prevent any other sites coming forward for consideration. Even if the AMJ proposal was progressed well before the 10-year time limit, but failed to attract support for any reason, it would not help the situation. As I see it, it would still allow alternative proposals for the AMJ to be submitted for approval up to the 'deadline'. Although I am sure it is not in BCL's mind, it would leave the process open to manipulation.
- 16.7 Moreover, it seems to me that this process could have an inordinate and negative effect on consideration of the P&R element of the integrated scheme. Assuming the P&R scheme was implemented in advance of the AMJ, it would, for a period, be unable to operate with all the movement opportunities intended. It would mean, also, that if the technical requirements for the AMJ could not be met and the MSA/TRSA not be able to proceed, the Brockworth P&R site may not be the best even for the A417 corridor, being as it is detached from the Gloucester City boundary. It may for example be better to locate a P&R facility to serve the A417 corridor on the land currently 'earmarked' for the proposed MSA/TRSA.
- 16.8 The other possibility is that the P&R would, most likely, be delayed as the Agreement does not automatically facilitate the provision of the P&R before the MSA/TRSA has definitely been secured i.e. the reserved matters application and AMJ approved. For the P&R to proceed independently, the appellants would have to transfer the land for the P&R to Gloucester CC and pay out the £0.9M required by the Agreement. I could understand them being reluctant to follow this course in advance of being certain that the progress of the MSA/TRSA is secure.
- 16.9 *Taking all these factors together, I remain uncomfortable with the possible consequences of the negative condition approach, however remote some may be. Be that as it may, I can see nothing fundamentally wrong with the approach.* Under any circumstances, I consider it appropriate to appraise the project as if the AMJ will be forthcoming and I have only commented on the possible delay where this impinges on other interests. I have, of course, avoided the debate as to the technical acceptability of the AMJ.

Material Considerations

16.10 The following are the material considerations and the order in which they have been considered:-

- Policy Framework
- Need for an MSA
- The ability of the Hucclecote/ Brockworth site to serve the M5
- Need for a TRSA
- Alternative sites
- Need for a P&R facility
- Other matters including:-
 - ❖ Landscape and Visual Appraisal
 - ❖ Noise
 - ❖ Light
 - ❖ Air pollution
 - ❖ Drainage

Policy Framework [3.1-3.3, 3.9, 7.1, 7.3-7.5, 7.7, 7.11, 7.15-7.16, 8.2-8.3, 8.5-8.12, 8.62-8.64, 9.10-9.29, 9.31, 9.34-9.40, 10.4-10.18, 10.36-10.38, 11.4-11.5, 11.8-11.13, 11.64-11.66, 12.1, 13.9, 14.8, 14.11, 14.13, 14.15, 15.1, 15.4, 15.7-15.8 and 15.11]

16.11 It is common ground that the appeal site is situated in the extant, statutory Green Belt lying between Cheltenham and Gloucester. In this regard, I note that the recently published Regional Guidance for the South West advises a revision of current Green Belt boundaries through the development plan process. In addition, there are outstanding objections to some existing boundaries, following advertisement of the revised deposit draft Tewkesbury Borough LP. Accordingly, I consider that the arguments for discounting or 'changing' the Green Belt boundaries at this time should carry very little if any weight. A formal revision of Green Belt boundaries is a considerable time off and it is not the role of a Section 78 appeal Inquiry to carry out an *ad hoc* review of the statutory Green Belt boundaries. PPG2 and the SP caution against reviewing and/or revising Green Belt boundaries outside the development plan process.

16.12 Moreover, in a location such as this, with so many external pressures, the appeal procedure is a particularly unsuitable medium for local revision. A further factor is that the northerly appeal site boundary would not necessarily be the most obvious or permanent boundary for revision purposes. I am firmly of the opinion, therefore, that this proposal should be considered against the background of the prevailing Green Belt policies and the appropriateness or otherwise of the particular land uses proposed should be considered in the context of PPG2: Green Belts and the Development Plan.

16.13 As the starting point in deciding the question of appropriateness, I do not subscribe to the argument that the MSA/TRSA and the P&R land uses should be classed as appropriate or inappropriate in their entirety. I note that BCL require the project to be considered as an integrated scheme with interdependency. However, where the individual elements of the scheme are treated differently within the prevailing policy guidance, it is necessary

- for there to be an essential inter-dependency in operational terms. In other words, either the MSA/TRSA could not function properly without the P&R element or vice versa.
- 16.14 In support of this conclusion, Tewkesbury BC offers the scenario of a combined housing and public open space proposal and, of course, there are numerous decisions and judgements that draw a distinction between essential and non-essential elements of sporting facilities.
- 16.15 In this case, I do not believe there is such an essential link. The MSA/TRSA could function perfectly acceptably without the P&R element. Similarly the MSA/TRSA is not essential to the P&R operation. The suggested link, the need for the coach stop to move from the P&R site to the MSA/TRSA site during the night, does not constitute 'essential' in my understanding of the word. As is pointed out, the need for a stop outside the city centre(s) during the night time is not necessary for traffic or congestion reasons. Nor do I see the funding link between the MSA/TRSA and the P&R as being essential in land use terms. Planning gain or public benefit there might be from the cross funding, but any functional link is so tenuous as to be virtually non-existent in planning terms.
- 16.16 On this basis, I conclude that the MSA/TRSA constitutes inappropriate development in the Green Belt. Such uses are not included in the guidance evinced by PPG2 and in my judgement an infill MSA does not fall under the heading of essential infrastructure. The proposed P&R may or may not be inappropriate depending on the conclusions reached after considering this element against the five tests evinced by PPG13 (Annex E). This I have looked at in detail when evaluating the need for the P&R element.
- 16.17 The only statutory Green Belt policy is SP Policy GB1, which acquired statutory force after the publication of PPG2: Green Belts. This Policy, does not include a provision for the outweighing or overriding of Green Belt policy by virtue of very special circumstances. In effect, Policy GB1 precludes all inappropriate development and even appropriate development that would infringe the aims of maintaining openness and preventing the coalescence of settlements. SP Policy GB1 allows only appropriate development and even then only where it would maintain openness and prevent the coalescence of settlements. Thus, operating a strict application of the development plan Policy, the MSA/TRSA, as inappropriate development, would run contrary to the obligations implicit in Section 54A.
- 16.18 Having said this, the case for most parties to the inquiry assumed that the 'very special circumstances' evinced by PPG2 should be a further material consideration. I am uncomfortable with this. It is perfectly legitimate for the Structure Plan to show variations from National guidance if justified by local circumstances. Having been approved after PPG2, I believe it is right to assume that SP Policy GB1 reflects the local situation. Thus, testing for very special circumstances is not a supportable option.
- 16.19 As to the reference to "*in the main*" relied on by BCL, this is not a part of the Policy, but part of the explanatory text. Moreover, I am satisfied that its inclusion does not invite very special circumstances to be adduced in the context of SP Policy GB1. It would be needed, however, in the situation where other material considerations might be so strong as to outweigh the presumption in favour of the development plan policies. There is, of

course, a distinct difference. In the case of very special circumstances 'justifying' a planning permission, the development would accord with policy. Where planning permission is granted because other material considerations outweigh the policy, the development permitted would be an exception to policy.

- 16.20 Having regard to the perception of the parties, I have addressed all the lines of argument presented to the inquiry. First, the area identified for the proposal is on land bounded by residential development to the south west, beyond a former dual carriageway section of the A417, and also to the east. The M5 and A417 are major highways running to the north and west, while the site is bisected by a fourth road the GBP Link Road. Even so, during daytime the M5, which is elevated, is the only road I found highly visible. By dint of earthworks and landscape planting, great trouble has been taken to 'design out' the new A417, its junction with the M5 and the GBP Link Road. As such, my perception from most vantage points is that the appeal site still remains a crucial element in fulfilling the Green Belt functions evinced by SP Policy GB1. The scale of development associated with an MSA would seriously compromise the purposes of including land in the Green Belt and in particular the openness and maintaining separation between settlements highlighted in SP Policy GB1.
- 16.21 Another argument levelled by BCL is that the appeal site is degraded and urban fringe. They draw support for this from the description agreed by Tewkesbury BC in the Statement of Common Ground. Even so, I have not found the visual quality of the land crucial. Green Belt is not a landscape designation and there is no intention that the Green Belt nomenclature should be given only to open land of high visual quality. Having said this, I do find the land to be of presentable quality, particularly when viewed from further afield. Even when looked at close to, it offers the opportunity for open green space and, most importantly from a local perspective, it physically separates the 'villages' of Hucclecote and Brockworth.
- 16.22 When viewed from further afield, and particularly Churchdown Hill to the north and the Cotswold Scarp to the south and east, the undeveloped nature of this particular part of the Green Belt would be lost. I acknowledge that the viewing points drawn to my attention were limited from Churchdown Hill and at some considerable distance from the Cotswold Scarp. Moreover, I accept that from the elevated positions the proposed development would be seen more in the context of the surrounding highway network, the Gloucester Business Park (GBP) and the existing and proposed residential development. Notwithstanding, once again, I have not found this line of argument critical. From all these vantagepoints, the undeveloped nature of the appeal site does provide, to a varying degree, a valuable open element or link in the visual separation between the main urban areas of Gloucester and Cheltenham. In fact, because it is Green Belt and bounded closely by existing development, the land might be considered more valuable in the Green belt context. I agree that if the land sported only a 'countryside' designation, its position might invite other arguments. However, this is not the case.
- 16.23 I could accept that the A417 and Link Road weakens the perception of a physical, as opposed to visual, link with the open countryside to the north and presumably makes it less 'useful'. Of course this does not lessen the visual contribution to the purposes of the Green Belt. Thus, I am clear that, at this time, this part of the Green Belt should be

safeguarded from inappropriate development. Accordingly, I consider the appeal site does fulfil the Green Belt functions required by SP Policy GB1 and that the MSA/TRSA constitutes inappropriate development within it. Moreover, it would not rest easily with the raft of policies in the SP and LP designed to direct development to urban areas and protect undeveloped land.

- 16.24 As for references in the development plan to the various elements of the appeal proposal, there is very little support, especially if one looks for something site-specific. A MSA is not included in the SP and the EIP Panel in its Report specifically excluded the need for one. An earlier draft of the LP did include a proposal for an MSA on the appeal site, but the reference was deleted in the later version. Although BCL suggest there was no justifiable reason for this, it does return the emerging LP to conformity with the approved SP. P&R is encouraged in the SP and the emerging LP as well as the LTP. However, beyond vague references to P&R provision to the east of Jn 11A there is nothing site-specific for the A417 corridor in any recognised plan. Similarly, there is no support in any policy for the AMJ at the M5 Jn 11A.
- 16.25 *Taking all these factors together, I conclude that in its entirety or its constituent elements the proposal is contrary to the provisions of the development plan and the emerging LP.*

Need for a Motorway Service Area

Policy Guidance [1.6, 7.2, 8.14-8.18, 9.42-9.47, 10.41, 11.6-11.7, 11.14, 12.1, 12.4, 14.8, 14.11 and 14.13]

- 16.26 During the inquiry references were made to the Prior Committee Report (Document BCL/RJS/2 Appendix 20), Roads Circular 1/94 and PPG13: Transport (1994). This was followed by forensic examination of Lord Whitty's Statement on MSA provision issued in July 1998. Before dealing with the site-specific circumstances, it is prudent to set down my understanding of the current guidance.
- 16.27 In the first place, it is clear to me that the main thrust of current guidance is the maintenance of safety on the motorway network. To achieve this, completion of MSAs at 30-mile spacing is generally favoured, but sites coming forward will have to have regard to the prevailing land use restraint(s) exhibited in development plans.
- 16.28 It is equally clear that for an infill MSA at some distance less than 30-mile spacing there will have to be exceptional and compelling need and highway safety arguments. I see these as two separate criteria, both having to be satisfied. It is probable, however, that that relating to need may also include a linked or consequential safety related argument.
- 16.29 From the content of the Whitty Statement, I think it is reasonable to deduce that these present 'controls' are intended to safeguard special landscapes or other designations such as Green Belts. However, as I read the Statement it does not go as far as this. In this regard, I note that the Highways Agency (HA) would support a compelling need, whether the site was in an area of special designation or not. In other words, it is the demonstration of compelling need and safety arguments for an infill MSA that are the

primary motivations. The provision of choice and the introduction of competition is no longer a major consideration. In fact, with the benefit of the Whitty Statement I find it hard to see what, if any, weight should be afforded such matters.

- 16.30 When faced with a compelling need and safety argument for an infill MSA, it is then for the local planning authority, or authorities, preferably through the LTP and development plan, to meet the identified requirement at least environmental cost. It is on this basis that I have considered the appeal proposal against the five criteria embodied in the Lord Whitty Statement and the other material considerations raised by the parties. In doing this I am mindful that the Statement does not require all the 'tests' to be met, but merely says that they should be considered.

Existing Spacing [3.15, 8.19-8.20, 9.45, 11.15-11.24, 12.5-12.11, 14.1, 14.3, 14.9-14.10, 15.4, 15.6 and 15.16]

- 16.31 For southbound travellers, the agreed distance between the Strensham and Michaelwood MSAs is 31.5-miles. In the opposite direction the distance is 33-miles, the longest gap between services on the M5 motorway. As said, the Whitty Statement looks for MSAs at about 30-mile spacing. In my judgement, the separation between Strensham and Michaelwood does not present, of itself, a strong argument for an infill MSA. A distance of 10% over the 30-mile guideline spacing respects the word "*approximately*" in the Lord Whitty Statement. In no 'official' policy statement or guidance can I find any indication that a separation of more than 30-miles is an automatic trigger for an infill MSA.
- 16.32 In reaching this conclusion, I have been mindful of several arguments prayed in aid of BCL's case. The first of these is that the 10% 'excess' distance imposes a journey time for some with lower mandatory speed limits, especially HGVs and caravans, of longer than 30-minutes and this is contrary to the guidance. In my view this may be factually correct, but the conclusions BCL draw from it cannot be right. If the 30-minutes were taken as the criterion as opposed to the 30-miles, then the whole philosophy of the MSA policy process in published guidance would be undermined.
- 16.33 For example, it is likely that the most congested stretches of motorway would inevitably deliver the most forcible argument for an infill MSA. Whereas a time in excess of 30-minutes might be an argument in a very few cases, common sense informs me that the most congested stretches of motorway are invariably those carrying the highest percentage of commuter traffic. This is a class of traveller much less likely to have need of or avail itself of MSA facilities. In these cases, proposals have to be appraised on their individual merit.
- 16.34 The second point is essentially the reverse argument. In achieving the 30-minute average travel time a significant proportion of motorway traffic travels above the national speed limit. The implication here is that, if there is a need for motorists to break the speed limit to secure the opportunity to stop/ rest every 30-minutes, the 30-mile spacing evinced by policy is too great. Once again, I have not found this crucial. This fact is not new and was certainly known about before the 1998 Statement. As such, had Lord Whitty found this to be a cogent argument, he would no doubt have

reduced the 'normal' spacing to a distance less than 30-miles. As it is, this knowledge did not elicit a change to the content of the Statement.

- 16.35 In this case, the stretch of the M5 between Strensham and Michaelwood operates generally under free flow conditions and the journey time for most traffic travelling within the national speed limit will be little more than 30-minutes and certainly, I believe, within the spirit of the Statement. This is forecast to continue up until 2020 and beyond. That is not to say there are no occasions when the travel time exceeds 30-minutes and, when there are road works or an accident, sometimes this might be considerably so. If the Statement had intended to take such occurrences into account, however, then it would have been made clear. In any event, advance signing could advise of problems beyond the next MSA and this should alert most drivers of the need to reassess their journey stops.
- 16.36 Incidentally, there was no corroboration from the HA that a 50-mph speed limit on the M5 was or is under consideration. Such a change could be material.
- 16.37 On the other hand, it is fair to say that the separation between Strensham and Michaelwood would not preclude an infill MSA, by virtue of the distance between MSAs being too close ie. 10-miles to attract signing approval from the Highways Agency.

The Operational Capacity of Adjacent MSAs [3.16-3.17, 8.21-8.23, 8.26, 8.41, 8.67-8.70, 10.41-10.42, 11.3, 11.23, 11.25-11.44, 12.12-12.22, 12.32, 14.2, 14.17-14.19, 15.11 and 15.16]

- 16.38 At the time of the inquiry, of the adjacent MSAs only Strensham northbound was a modern MSA facility, incorporating the design experience accrued over many years of practice. The remaining three MSAs, Strensham southbound and Michaelwood north and southbound are 'old style' MSAs, where improvements could be made. Having said this, in all cases the parking capacity at each exceeds the minimum requirements given in Roads Circular 1/94, even when measured against today's flows.
- 16.39 Developing this, the advice in Roads Circular 1/94 is one of, if not the, strongest arguments for not requiring the provision of parking etc at an MSA to cater for the 'peak of peaks'. The requirement in Roads Circular 1/94 only relates to annual average daily flow, not even the 30th or 50th highest hour or day. If it had been the intention to cater for the period of greatest demand then I would have expected the 'requirement' to be much higher. This approach broadly coincides with that voiced by the HA. What the guidance in the Whitty Statement does not do is define what exactly is meant by 'peak demand'. Even so, having regard to normal design practice, I am not persuaded that we should look to cater for the highest peak during the year. This would leave a significant level of the provision at MSAs under utilised for most of the year. Having said this, the particular line of argument does raise a point.
- 16.40 As I understand the MSA regime, a signing agreement is issued by the HA to an operator for a period of 50-years. Although there may be contractual requirements by the fuel provider for the operator to upgrade the petrol/ diesel facilities during that period, there is no similar obligation in relation to the parking or restaurant/ retail

facilities. Thus, any improvements to the catering or parking facilities will result from market forces and not necessarily highway design, safety or flow characteristics and certainly could not be 'directed' by the highway authority or the Police. It was suggested by BCL that, when proposing the redevelopment of an MSA, the facilities at any MSA should be reviewed in the light of future, increased traffic flow on the motorway. At this time, improved facilities should reflect the projected demand 15-years ahead (2016). In other words, any redevelopment should be treated as a 'new' development in the context of Roads Circular 1/94, and not a refurbishment.

- 16.41 This was of course hotly disputed and one can understand the position of existing operators 'defending' their patch. Taking an overview, however, there is some logic in BCL's argument. 50-years is an extremely long time in traffic terms and since the MSAs have opened growth has been and is still predicted to be high. Thus, there is nucleus of an argument that entering into a signing agreement for 50-years, when the provision of facilities would not necessarily be reflected for the last 35-years of the period, is short-sighted. Notwithstanding, this is not the requirement of the current regime and I am sure was considered when the guidance in Roads Circular 1/94 was drafted and the standards of provision decided. If the BCL 'requirement' was adopted this would, of course, almost certainly inhibit operators submitting any improvements that did not meet fully this standard of provision. Should this happen it would be to the motorists' disbenefit. Accordingly, I have not attached weight to the argument that suggests that at the time of a redevelopment of an existing MSA, provision of facilities should reflect a date 15-years hence.
- 16.42 As it is, I am confident that overall parking provision and catering facilities could be increased substantially at all the Strensham and Michaelwood sites. Looking first at the catering, no-one suggested that this aspect of the MSA operation was under particular pressure. This is perhaps understandable following the introduction of established fast food outlets at many of the existing MSAs. In fact, at most times the reference to catering involved the closing down of operations during certain times of the day and year, not the need to open new ventures or expand.
- 16.43 Moving onto consider the existing parking provision, as pointed out earlier, this easily meets the Roads Circular 1/94 requirement for many years to come. Even if it did not, and I acknowledge that this is a minimum requirement, additional parking could be provided. This may be through the introduction of decking over some or all of the car park areas, as is currently the case at Bridgewater. There has been no case argued that the facilities at the adjacent MSAs are found wanting for a significant part of the year and the potential for expansion is limited to a material degree eg where decking might not be an option for visual/ landscape reasons.
- 16.44 Incidentally, although the policy guidance does not advocate improving existing MSAs before considering infill sites, this must be the logical conclusion of the Whitty Statement. If you marginalise any weight from submissions about choice and competition and add weight to the protection of land and landscape designations, then the early consideration of how adjacent sites might serve the needs of the motorist is a natural and imperative consequence.

- 16.45 Thus, under general circumstances and acknowledging this potential for improvement/expansion, the only factor that would preclude this being an acceptable stance here would be if the ingress and egress and internal circulation arrangements could not cater for the likely demand. There is no suggestion that the ingress and/or egress arrangement at any of the Strensham or Michaelwood sites could not cater for the turn-in from or the rejoining of vehicles with the M5 for many years to come. There is an argument that the internal circulation at Michaelwood southbound would 'fail' and have consequences for the off-slip road. I have considered this later.
- 16.46 As to the difficulties experienced, there is no evidence of profound congestion at or in Strensham southbound or Michaelwood northbound. Although there are much higher turn-in rates than envisaged by Roads Circular 1/94, both MSAs cater remarkably well. There may have been one or two occasions when there have been problems, but the Police have not highlighted any periods when the approach slip road to either MSA has had to be closed or actively managed by the Police.
- 16.47 Of course, the same cannot be said of Michaelwood southbound. On some Saturdays during the summer and two or three other occasions during the year active management of the slip road approach has to be effected by the motorway Police. This generally lasts for a short period, with monitoring of the situation continuing until any danger is passed. It appears this is caused by congestion within the MSA itself where, on occasions, the demand exceeds the practical capacity of the internal circulation arrangement.
- 16.48 The Police view, and I see no reason to disagree, is that on most if not all of these occasions the congestion at Michaelwood southbound is fuelled by its position in relation to centres of population and the travellers' final destination. The submissions proffer two possible scenarios, but my notes relate to a particular overlap between two distinct classes of user. The first are those towing caravans from the 'far' north, who use Michaelwood southbound as an overnight stop on the way to the West Country. The second are those early starters from the Midlands travelling to the West Country, who stop to use Michaelwood southbound as a breakfast and comfort stop. This takes place before those towing caravans have left to continue their journey south. The attractiveness of Michaelwood for these users would appear to be heightened by the well-known difficulties encountered by travellers using the next southbound MSA at Gordano.
- 16.49 During the crucial period, there may also be some competition between caravanners and HGV drivers for the available parking space. However, on the Saturday mornings that are particularly highlighted, I would be surprised if this conflict was marked.
- 16.50 In this deliberation, it is interesting to note that the guidance in Roads Circular 1/94 does not specifically require the provision of dedicated caravan parking spaces. It would seem they are expected to find space within the HGV parking areas and, no doubt, during slack periods use can be made of the peripheral car parking areas. Even with the knowledge that these circumstances occur several times each year, no advance and/or additional signing by the Police or site management by the operator is currently felt to be necessary. Moreover, if this is purely a 'locational' problem then it perhaps

points more to an extension/ improvement of Michaelwood, rather than a new infill site located elsewhere.

- 16.51 Considering the general HGV position, I visited all four MSAs during both the day and night and found these were well patronised, particularly at Strensham north and southbound. Even though the parking at Strensham southbound approached the maximum, some of the allocated spaces remained vacant. At Michaelwood the marking of the HGV spaces is extremely poor and this may make management of the spaces more difficult. Nevertheless, I am inclined to the Police view that those HGV drivers who park on the periphery, or occasionally on the exit slip road, are not forced to do so by dint of any inherent overcrowding. Generally this is done for convenience, especially to facilitate a short stay to comply with tachograph requirements. At the extreme, I have no doubt some do it out of laziness or their inability to manoeuvre into vacant spaces that are tight and not always clearly marked.
- 16.52 In addressing the perceived problem during the peak of peaks, and improving the situation generally, I can see a real opportunity for the MSA operators to manage spaces more efficiently during the busiest periods. This would relieve the pressure on the slip road access. At present, it seems to me that there is little active management of the car and lorry/caravan spaces. What is done is by the local/ motorway Police in time of greatest need. This tends to concentrate on the slip road access as opposed to the internal circulation. In effect, one might conclude that the Police action is addressing a problem that might be prevented. It seems likely that caravanners would arrive during the night when visits from car drivers would be relatively low. At such a time the MSA car parking area offers an option for caravan parking. If the effects of this could be 'managed' by the operator from the outset, then the conflict the following morning could be minimised.
- 16.53 Even if this were not to prove totally effective, there are a number of other measures that could be trialled to relieve pressure. These include signing and marking and even extending or widening the access slip road at the expense of the hard-shoulder or verge. The fact that nothing has been done to 'improve' the situation leads me to agree with the operators and the Police that any problems do not require a 'permanent' solution, but can be accommodated on an *ad hoc* basis by the Police.
- 16.54 It was said by BCL that the idea of this level of difficulty and congestion being condoned on 30, 40 or 50 occasions during the year is unacceptable. At present, it happens on nine or ten days a year. The proposed improvements to Strensham southbound and Michaelwood north and southbound may reduce this number, or perhaps only hold them steady for a time. As traffic grows with time, the situation may then occur on more occasions. However, even should the existing difficulty be repeated on 50-occasions each year, it would not necessarily be a compelling reason for approving an MSA infill site. I see this being little different from the philosophy that adopts the 50th highest hour for design purposes. Some action might be required, either from those responsible for the highway for advance signing or physical works or the MSA operator if there were to be a shortfall in the internal facilities or layout. Certainly, as concluded earlier I am under no illusion that MSAs should be expected to cater for the peak of peaks.

- 16.55 Taking all these factors into account, I am not convinced that the present situation at the adjacent MSAs is so difficult as to constitute an overriding reason for an infill MSA. Although the use of the MSAs is high, this does not seem to cause any undue problems, other than on a comparatively few days during the year. The Police manage these reasonably effectively and there is no accident record to suggest differently. In my opinion, therefore, if we were to rely on the existing 'poor' position at adjacent MSAs I do not think that this would pass the second Lord Whitty 'test'.
- 16.56 By way of confirmation, I have looked at the other argument advanced. First, when appraising new MSAs we are advised to consider the position 15-years hence. In predicting the likely situation on the M5 in 2016 without an infill MSA, I find several facts relevant. In the first place, it is accepted that the existing freeflow conditions for traffic between Strensham and Michaelwood will still prevail. There will still be a substantial reserve capacity on the M5 for most of the time. From this, we can deduce that the general travel time between Strensham and Michaelwood and vice versa should not increase materially creating a greater need for people to stop at an infill MSA for essential reasons. As stated earlier, there are no suggestions that the general traffic speeds on the M5 should be lowered.
- 16.57 A further point raised by BCL is the need to address not the 15-20% that does stop at MSAs, but the needs of the 80-85% that pass by, without stopping. Although an interesting concept, I have some difficulty with the arguments. There is no clear indication why a particular driver or car stops at one MSA in preference to another. On-line MSAs perform better than off-line ones and that may be a contributory factor. However, whether drivers pass one MSA because they may think it will be busy is not quantified in any objective sense. One might argue, also, that drivers could be aware that Gordano services are often overcrowded and this might encourage people to stop at Michaelwood. Even so, 80-85% of traffic does pass Michaelwood without stopping and I am in no position to surmise that this 'understanding' might have a knock on effect on the usage of MSAs further down the line. On this basis, I think it would be wrong to afford this line of argument any great weight.
- 16.58 A second factor is that even at today's highest flows this does not appear of itself to overload the services at Strensham and Michaelwood. The times of most severe pressure stem highlighted from a combination of other factors, namely traffic composition and holiday destination. Thirdly, with the existing and proposed parking spaces at Michaelwood and Strensham, the redeveloped services could cater for a turn-in rate of 15% based on the Roads Circular 1/94 criteria. Once again, even if there were found to be a shortfall, decking would have to be considered before one could conclude that an MSA could not cater for the normal peak demand. Finally, of course, there are the traffic management and/ or physical improvements that could be effected on the approaches or within the MSA site itself.
- 16.59 I accept that the need for an infill MSA that exists today may increase progressively over the next 15-years. However, this would not be to a level that I judge exceptional in the context of today's criteria, though clearly the combination of factors that serve to cause difficulties on nine or so days a year may also increase. As I see it, without these combined factors the MSAs would still cater adequately for the AADT flow in 2016 and

without some objective assessment to demonstrate otherwise, I see this as a very strong argument.

- 16.60 In reaching this conclusion, I have been mindful of two other matters. Currently under construction is a major upgrading of the Strensham southbound MSA. Although this will still exhibit some minimal operational shortcomings, I am satisfied that it does constitute a significant improvement over the existing. More importantly, I believe there is still more that could be done to improve the facilities and operational throughput.
- 16.61 As for Michaelwood, there are proposals to upgrade both the north and southbound MSAs. Once again, it is likely that even after implementation there would be residual faults. At Michaelwood southbound, additional parking would be available, though not considered necessary in the first stage of redevelopment. In giving less weight to this proposal, I am conscious that planning permission has not yet been granted and, thus, the commitment is not yet secure.

Sleep Related Vehicle Accidents (SRVA) [8.18, 8.21, 8.24-8.25, 8.38-8.50, 11.45-11.50 and 12.23-12.329]

- 16.62 The appellants place great reliance on the information and statistics pertaining to SRVAs. This is understandable as Lord Whitty's Statement highlights this specifically as one of the five main criteria against which the proposals for infill MSAs should be assessed. Having said this, however, there is a dearth of information advising how to conduct an objective assessment and very limited published data against which to judge BCL's findings.
- 16.63 If applied in the strict statistical and/ or analytical way advocated by BCL the consequences are somewhat profound. For example, if the SRVA percentage is marginally above the 'normal' then it could be said that the Whitty test is met. Thus, a figure above the mathematical average or statistical mean would provide a strong reason for justifying an infill MSA. If this line of reasoning was accepted and the 'high' SRVA rate was addressed by the introduction of an infill MSA, even marginally, the 'normal' position, or average or mean would fall. Carrying this exercise through to its logical conclusion, there would be every likelihood that, in time, an infill proposal would meet this Whitty test on many if not all stretches of motorway where MSAs are at or above 20-mile spacing. I suggest that this was not the intention following the Whitty Statement.
- 16.64 When assessing against any base data, I would look for something above one standard deviation from the mean to give a statistical demonstration of the words "*higher than normal*". In any event, I am wholly uncomfortable with any accident computation based solely on the use of percentages. Equally, I would need more than just numbers to effect a meaningful comparison. BCL suggest that because the Atkins' Accident Review Study expresses the desired reduction in accidents numerically and not as a rate this should be the approach here. I do not agree. Traffic is predicted to rise as a function of time. Thus, even though the accident rate may fall, the actual numbers may not. The Atkins' Report imposes a much stricter target and I am sure this was recognised at the time and why a 'real' reduction is sought.

- 16.65 In my opinion, the accident rate per million vehicle kilometres (pmvk) should be the starting point. If this is higher than normal then one might turn to the absolute numbers to establish the need for an infill MSA. For example, if the SRVA rate pmvk was higher than statistically normal, but the flows were low and the actual number of SRVA events was small, it should carry proportionately less weight than the situation where a high SRVA rate pmvk is matched by high numerical values of accidents and/or traffic flows.
- 16.66 Even then, I would look for the statistical base to be much more extensive than one abstracted from the three or four studies carried out so far. To reinforce my view, the studies undertaken have not been carried out on a consistent basis. For example, some have included damage only accidents and some have made an allowance for tyre blow-out incidents. Either of these factors could increase the number/rate/percentage of SRVAs on the lengths of motorway studied. Finally, there is no information about targeted publicity and/or education, which may already have lowered the SRVA rate on any of the lengths of motorway considered so far.
- 16.67 Perhaps most important, even Professor Horne accepts that the figures for SRVAs on the motorways concerned are of such an order as to make establishing statistical significance extremely unreliable, if not impossible. Even having defined objective parameters the identification of SRVAs is not a precise science. Moreover, even if we accept that all the studies undertaken have adopted the same principles of definition the samples involved are relatively small. I do not believe, therefore, that a percentage figure for this section of the M5, marginally above the average for the three or four motorways studied thus far, amounts to a compelling safety case. I recognise, however, that in strict mathematical terms the figure for the M5 between Strensham and Michaelwood is higher than the average percentage of SRVA incidents from this limited data base.
- 16.68 A further defining point in forming my conclusion on this aspect is that Professor Horne considers that the tendency for drivers to fall asleep can occur after 20-minutes drive time. Although this tends to follow some sleep deprivation, the evidence is that the driver is invariably aware that he/she is sleepy. As a consequence, Professor Horne considers that education is the key to reducing SRVAs and this will not come about until drivers are fully aware of the real dangers of falling asleep while driving and the consequences. It seems to me, therefore, that before advocating an infill MSA one initial approach to SRVAs on this or any section of the M5 should be a safety awareness campaign.
- 16.69 Next, there is the contention that 'clusters' of SRVAs can be identified on those sections of the M5 that would benefit from an infill MSA at Hucclecote/ Brockworth. For my part, I have had some difficulty in recognising these 'clusters'. However, even if I accept the appellants' position I am convinced that the numbers involved are too small to establish statistical significance. Moreover, I am not certain in my own mind, particularly having regard to the M40 Study, that the introduction of an infill MSA removes the clusters. Consequently, I have not found this argument crucial.

- 16.70 Finally on the topic of SRVAs, taking this line of argument to be compelling would not of itself reinforce a submission that adjacent MSAs are not able to respond to demand at peak times. The SRVAs occur during two particular periods of the day, namely mid afternoon and early morning, when the services at Strensham and Michaelwood are not especially stretched. In fact, when stopping at Michaelwood during the early morning period it is quite likely that some of the facilities, and possibly one side of the MSA, may be closed. If this was known, it might be a disincentive for even a tired motorist to break his/her journey. Incidentally, it is yet a further justification for concluding that the Whitty requirement is for both need and safety reasons.
- 16.71 In conclusion, I have not found the SRVA rate constitutes a compelling argument for an infill MSA, even utilising the figures in any of the three methods of computation given above i.e. percentage, absolute numbers or rate pmvk. In general terms, there is some agreement, and the evidence from the studies would certainly suggest, that a relatively high proportion of all motorway accidents is, or could be, sleep related. What is clear to me, however, is that Lord Whitty would have known about this before drafting his 1998 Statement and I have no doubt he took it into account when formulating the five criteria.

Safety Related Need [8.26, 8.69, 11.51-11.54, 12.3, 12.30-12.31 and 14.17-14.19]

- 16.72 Turning to the general safety argument, the HA (Document BCL/RJS/2 Appendix 22) advises that if SRVA information is not available then the general accident level should be considered. It might be suggested that this is directly at odds with the Whitty criterion on SRVA. However, I am mindful that the criteria also refer to highway safety in its more general sense, namely to a need that is safety related.
- 16.73 In any event, there is no suggestion that the level of general accidents on this section of the M5 is high. In fact, all the evidence points to a figure appreciably lower than the average for all motorways. Although BCL contend that weight should be afforded the predicted or potential for accidents, I do not accept this proposal. Accidents are by their very nature random, multi-factor events and, as such, it is notoriously difficult, if not impossible, to predict actual events.
- 16.74 Moreover, there is no suggestion that there have been accidents on the slip road approaches to the relevant MSAs. Thus, there is no objective information available to the inquiry to demonstrate that any particular accident or accident type would be prevented by the introduction of an infill MSA at Hucclecote/Brockworth. In saying this, I recognise that a small number of accidents etc may have been caused by people parking on the hard shoulder in emergencies, having fallen short of the MSA location, where fuel or comfort would have been available. However, the general low level of accidents on the M5 does not invite a conclusion that there is a safety-related need for an infill MSA at Hucclecote/ Brockworth.
- 16.75 A final comment on the topic of accidents arises from the inevitability of increased accidents on the access to any new MSA. Contributing to these could be some 'new' ones and some could be 'transferred' from other locations to the new MSA access and site. In my judgement this is particularly so in a situation where the route to and from the MSA from the motorway is lengthy and tortuous, involving drivers negotiating at

least two and possibly three roundabout intersections. Taking an average accident rate for these manoeuvres I am advised this arrangement would suggest 5-accidents each year (Document HA20). In answer to my questions, the HA considers this to be an underestimate rather than an overestimate. On the basis that the layout would be unfamiliar to most, I see no reason to disagree. For this reason, I believe the general accident rate for the length of the M5 between and including Strensham and Michaelwood MSAs could actually increase as a consequence of an off-line MSA at Hucclecote/Brockworth of the type now proposed.

The Type and Nature of Traffic using the M5 [3.10, 8.27, 8.31, 11.55 and 12.10]

16.76 Under this particular topic, it is agreed that for vehicles using the M5 a high proportion is holiday traffic and, thus, trip lengths are longer than on many motorways. It is also accepted that over the summer there is a high variation in flows, generated principally by holiday traffic. Even so, the HGV percentage 11.9% is low compared to other motorways and no origin and destination survey information is available. On balance, however, I consider that the fifth criterion embodied in Lord Whitty's Statement would be satisfied.

Other Factors [8.28-8.37, 12.32 and 14.17-14-19]

16.77 Several other matters were prayed in aid of the need argument and I have considered these in turn.

16.78 As for the views of the Police, the appellants conclude that their comments demonstrate a pressing need for the proposed Hucclecote/Brockworth MSA. On the other hand, the HA is in regular contact with the Police to discuss difficulties at existing MSA locations. It was emphasised that no particular problems requiring physical remediation have been registered by the Police in connection with Strensham or Michaelwood MSAs. Faced with this conflict of views, I have found it difficult to draw any firm conclusions. However, as indicated earlier, there are occasionally problems, particularly at the Michaelwood southbound MSA, but this is generally managed by limited on-site Police presence. It might be concluded that the Police are content to address these problems in this way for the time being, but, if and when they feel physical remediation is necessary will bring it to the HA's notice.

16.79 The Road Haulage Association (RHA) considers that there is an urgent need for an additional MSA between Strensham and Michaelwood, due to the lack of parking in the existing MSA lorry parks. They add that, due to lack of capacity within the MSA, some HGVs are parked on the slip roads. It is first of all worth noting that the RHA support all new proposals for MSAs. This is perfectly understandable as they provide facilities for their members in an increasingly regulated industry.

16.80 As for the parking on slip roads, on very rare occasions this might be as a result of overuse of the lorry parking area. Much more generally, however, I am inclined to the view that this is usually for the convenience of the driver, when taking a short break and avoiding the need to make a complicated parking manoeuvre. From the evidence and information submitted to the inquiry, there is nothing concrete to show a shortfall in

HGV spaces and I know that when I carried out visits HGVs were parked on the slip roads, despite there being ample space available in the HGV park.

- 16.81 Finally, I consider the 1994 inquiry decision in respect of the proposed MSA development at Ongars Farm between Jns 11 and 12 of the M5. The Inspector at that inquiry concluded that it was necessary to have regard to the effects of traffic growth and to do this against a background of occurrences during peak holiday weekends, when the capacities of the existing MSAs are exceeded. This conclusion was reached in 1994 and since then, there is no evidence that the growth in the peak hour flows has been anything like as high as the general growth in traffic flows. For this reason, I have not seen this line of argument as crucial and have taken account of future growth in my earlier comments.
- 16.82 In the same inquiry report, the Inspector concluded that there was a need for an infill MSA, but at that time the need was not compelling. I am mindful that that decision was issued following publication of Roads Circular 1/94, PPG13_(1994 version) and against the background of the guidance that looked to introduce choice and competition. It was not at a time when the current weight was afforded the protection of landscape and other designations such as Green Belt. I accept that there remains a need, but it is still not compelling when judged against the prevailing policy guidance.

Summary of the Need Argument for an Infill MSA

- 16.83 *If one takes a narrow view that the exceptional circumstances needed to justify an infill MSA are all accident related, then I am in no doubt that the evidence currently available does not prove the appellants' case. The only concrete argument in their favour is the fact that the percentage of SRVAs on this section of the M5 is marginally, mathematically above the average of the investigations taken on a very few motorways studied so far. In my judgement, this is not a compelling argument.*
- 16.84 *If one looks at the wider perspective, it is easy to understand why prospective applicants for infill MSAs on this stretch of the M5 motorway are tempted to proffer site options. There are high seasonal peaks; there are peaks of congestion and these may increase with traffic growth; the existing spacing is over 30-miles; and it is recognised that Gordano Services are overloaded. Against this, however, the existing and predicted traffic flows on this section of the M5 within the next 20-years are never likely to approach the capacity offered by the motorway and the Roads Circular 1/94 minimum requirement is bettered for many years to come.*
- 16.85 *On this basis, the normal peaks will be catered for by the existing facilities and only the highest peak on maybe 15 or 20 days of the year will cause problems that require active intervention by the Police. Even if this situation did worsen, there are traffic management measures or more major works that could improve the present situation and there is the potential to increase the operational capacity on the existing MSA sites at Strensham and Michaelwood. In my judgement, the situation of this stretch of the M5 does not constitute the exceptional circumstances demanded by the criteria in the Lord Whitty Statement to justify an infill MSA.*

The Ability of the proposed MSA at Hucclecote/Brockworth to serve the M5 Motorway [1.2, 8.51-8.53, 9.44, 11.23, 11.53, 11.69-11.70, 14.13, 14.19, 15.1, 15.10 and 15.12]

- 16.86 Insofar as the proposed MSA site is concerned, it is extremely well located between the existing services at Strensham and Michaelwood. However, it would be an off-line facility with what I would describe as a tortuous access route. As such, and even recognising that Roads Circular 1/94 does not differentiate between on and off-line MSAs meeting need, I believe it would be unlikely to command serious patronage from M5 motorway users. I envisage the turn-in rate from the M5 being no more than 5%, based on the 2-3% figure at Chieveley MSA. The diversion to and from the M5 motorway is longer than at Chieveley on the M4 and, more than likely, this offsets any turn-in deficit at Chieveley that might be occasioned by the incomplete advance signing. In reaching this conclusion, I do recognise that the turn-in rate for vehicles using the A417 could be higher.
- 16.87 Incidentally, the argument used by BCL about the difficult road geometry in Devon and Cornwall does not attract me. Approaching Hucclecote/ Brockworth, a driver would have a choice about whether to stop or whether to pass on to either Michaelwood or Strensham. I am in no doubt that the tortuous route here would inhibit its use. When travelling in Devon and Cornwall, once a particular destination is decided, there is unlikely to be an alternative route.
- 16.88 Thus, the impact of the proposal on motorway users on the M5 would be extremely limited for the vast majority of periods during the year. I believe that the delivery on offer from a proposed Hucclecote/Brockworth MSA would have little effect on the operation of Strensham and Michaelwood during base load demand. I accept, however, that at a few summer and other peak times, and particularly if advance notification of congestion at Strensham/ Michaelwood could be signed, an infill facility would provide another opportunity for motorists to stop and rest. This should aid the operation of the motorway to some small degree.
- 16.89 For much of the year, however, the relatively low demand for services would be divided between three as opposed to the two existing sites. As voiced by the Manager at Michaelwood, during quieter periods sections of the catering facilities and even one entire side of the MSA (other than for fuel) can be closed down. Greater provision could lead to this happening on more occasions and as this becomes known, it may inhibit drivers using MSAs for rest etc with the possible knock on effect on accident potential. Accordingly, I have not found the benefits offered by the proposed MSA a strong contributor to the justification.
- 16.90 Another factor raised by the objectors to the appeal scheme is that pertaining to the site becoming a destination in its own right and it 'inviting' crime into the area. On the first point, this must be so to some degree and a MacDonalds or a Burger King might attract local clientele. As for the crime argument, this is only based on anecdote. Before affording this line much weight, I would look for evidence to be provided to this effect from the Police. Then the consideration of 'planning out crime' would become material.

- 16.91 One final matter is that of providing a lodge on the MSA appeal site. Many decisions were laid before the inquiry with conclusions both one way and the other. For my part, I believe that a lodge is not an essential component of a MSA facility. Desirable it might be, but that is not the same thing. For sites in the Green Belt, PPG2 gives a simple explanation of the weight to be afforded sports facilities that are not essential to the principal use. I view a lodge within a Green Belt MSA site in a similar way. A lodge is inappropriate development and under the SP Policy GB1 should not be permitted. If one were to extend the debate to embrace other material considerations, then there is no objective evidence of need before the inquiry. Moreover, from my own observations I saw most categories of hotel accommodation conveniently located and, I am advised that further provision is being contemplated at the entrance to the GBP. Thus, even if the lodge could be landscaped effectively, I do not consider that the balance of argument is compelling.

The Need for a Trunk Road Service Area [3.11, 3.13, 3.18-3.19, 7.2, 7.13, 8.13, 8.30-8.33, 9.53, 11.53-11.63, 14.3, 14.13 and 15.13]

- 16.92 The guidance on TRSA provision dates back to Roads Circular 4/88. This advises that, ideally, provision of key sites offering comprehensive service facilities for Trunk Road users should be provided no less frequently than every 25-miles or half an hour's travel time. More recent guidance in the Design Manual for Roads and Bridges Technical Advice Note TA 69/96, seeks lay-by provision every mile and gives the geometric standards to which these should be designed. In some ways, it might be concluded that the later TA Note on lay-by provision recognises the need for HGV drivers to rest in compliance with the current tachograph regulations, while appreciating that it might not be possible to provide sufficient parking facilities for HGVs, within even a comprehensive TRSA. This is perhaps particularly so since the decision to identify a core Trunk Road network, which of course was undertaken after Roads Circular 4/88 had been issued.
- 16.93 It is not yet clear to me how the Roads Circular 4/88 guidance will change to recognise the advent of the core Trunk Road. In some respects, it will be easy to argue that the frequency should reflect that suggested for motorways, with facilities tailored to the lower flows and turn-in rates. This line of argument would be supported by the provision of lay-bys on Trunk Roads, a rest facility not available on the Motorway network.
- 16.94 Consequently, I am inclined to the view that, today, the frequency of TRSAs should be less prescriptive. This would allow weighting to be imposed depending on whether the road was a single or dual carriageway and the travel times it 'delivers'. Regard, however, would still be had to the traffic composition, and, particularly, the percentage of commuters. To opt for a distance criterion only, or even predominantly, could lead to over-provision, which might undermine the viability of some, leading to sporadic and irregular provision.
- 16.95 At present, the local Trunk Road network comprises the A419/A417 link between Swindon and the M4 and Gloucester and the M5 and thence north and south via the M5

to Birmingham and Bristol respectively and westward via the A40 to Ross on Wye and Mid Wales. The A40 is not designated as a part of the core Trunk Road network.

- 16.96 The current provision of services on this network is agreed. A new key site, offering comprehensive facilities is under construction at Cirencester, some 12-miles east of the M5. Southbound on the M5 the Michaelwood services offer facilities for those travelling to Bristol and the South West and Strensham offers facilities for those travelling to Birmingham and the north. The spacing between Cirencester and Michaelwood and Strensham is at or less than 30-miles. Perhaps more importantly, having regard to the highway characteristics it should be little more than 30-minutes travel time at a speed of 60 mph, even allowing for the steep section on the A417 near Birdlip.
- 16.97 Although this level of provision does not accord precisely with the advice given in Roads Circular 4/88, I am conscious that that guidance was issued in the context of general Trunk Road provision and pre the TR core network. At that time, many lengths of Trunk Road were single carriageway and/or all-purpose roads, with much lower travel speeds than would be available on the A417 east of the M5. On this basis, I consider that the movements from the M5 north and south along the A417/A419 and vice versa are catered for adequately. Incidentally, in reaching this conclusion I am mindful that no evidence has been submitted to demonstrate a higher than normal accident rate on either section of the M5 or the A417 between Gloucester and Cirencester.
- 16.98 One further point is the acceptability and therefore reliance that should be placed on off-line lay-bys. If I understand the HA policy view on these correctly, the Agency is in the process of closing these off. They are frequently expensive to maintain and generally being out of view of the main carriageway can attract some unsavoury activities. As a consequence, the weight given to the existence of off-line lay-bys should be tempered. If reliance is placed only on the on-line lay-bys, then I agree that the TA guidance is not met.
- 16.99 To the west of the M5, the A40(T) offers no key site, boasting comprehensive facilities of the type envisaged by Roads Circular 4/88. Moreover, significant lengths of the 29-mile or so route between Gloucester and Ross on Wye comprise relatively slow sections of single carriageway highway passing through numerous villages and hamlets. From my observations, the lay-by provision along this section of the A40 is lacking in both frequency and geometry compared with the aims of TA Note 69/96.
- 16.100 There is a current proposal to de-trunk the A40 west of Gloucester and, although there are financial objections, Gloucestershire CC as the presumptive highway authority raises no objection in principle. Thus, although the actual process may take some time, I believe it is sensible to anticipate the de-trunking and consider the consequences that might flow therefrom. In the first place, the A40, when overseen by Gloucestershire CC, will, no doubt, be subject to pressures to serve new development and for the introduction of traffic calming/safety/traffic management measures. If any or all these are supported they are likely to slow down through traffic, leading to longer travel times along this section of the A40.

- 16.101 Following the de-trunking of the A40, the signing arrangement for Ross-on-Wye and South and Central Wales would not change automatically. However, as average traffic speeds fall on the A40 I anticipate that many drivers will divert to the M5/M50/Ross on Wye and beyond. This would be particularly true if the travel time for the shorter A40 route were to exceed that on the longer M5/M50. From my own experience, some might claim that is already the situation on occasions.
- 16.102 The second point is that, at some time in the future, the LTP looks to sign traffic for Ross on Wye north on the M5 and M50 and the reverse route similarly. If that were to happen, the distance between Trunk Road services at Ross on Wye and those at Cirencester could be some 51-miles. Incidentally, I note that Strensham was seen as an option by the recent SP EIP and this was advanced as one reason why no further service provision need be made on the M50/M5. Although I am not privy to the reasons behind this, I am puzzled by the conclusion reached by the Panel. Use of Strensham for traffic travelling from the M50 south along the M5 would involve an 18-mile detour and similar in reverse. Consequently, in reaching my conclusion I have discounted the opportunity offered by Strensham services to meet this need.
- 16.103 The question is, therefore, should we be anticipating the change of route signing and, if so, what number of vehicles would this affect? Although general survey work indicates some 40% of vehicles on the M50 turn right onto the M5, there is no study to identify how many of these vehicles have destinations south or east of Gloucester. Without this information it is not possible to divine a true figure. Experience indicates, however, that with the alternative destinations/ routes available the figure would be comparatively low.
- 16.104 In terms of the ability of the proposed Hucclecote/Brockworth MSA/TRSA to meet the needs of existing and future Trunk Road traffic, there is no doubt that it falls at an extremely convenient position, as it is some 12-miles from Cirencester and at the junction of the north/south and east/west Trunk Roads. It would, however, be 39-miles from Ross on Wye via the M5/M50, though to temper this there is no guarantee that the route signing arrangement would change. Moreover, even if they did, the numbers of vehicles that would derive benefit would be comparatively few and an MSA a little way to the north would satisfy the need equally. ***For all these reasons, I consider there is a stronger argument for TRSA provision at Jn 11A, but not at present compelling in its own right.***

Alternative sites [8.55, 8.61, 8.66, 9.48-9.50 and 15.8]

- 16.105 Turning to alternative sites, I do not consider that any MSA site south of Jn 11A on the M5 would serve the purposes of both the Motorway and Trunk Road (A417). In my view, the harm to the Green Belt or other designated areas of releasing two sites for development is likely to be inordinate. Consequently, I consider that, if we are to serve both the M5 and the A417, only those alternative sites at or to the north of Jn 11A can be considered realistic. Even then, this assumes de-trunking of the A40 west of Gloucester and signing Ross on Wye via the M5 and M50.

- 16.106 In this regard, the spacing of the junctions leaves no site that complies with the requirements for access to and from the motorway or the minimum distance of 10-miles from Strensham at which the HA indicated it would be prepared to sign. There would be the possibility of combining an on-line MSA/TRSA facility with an existing junction. However, of the parties concerned none has advanced a firm proposal as a serious alternative. *On this basis, I conclude that the appeal proposal would achieve the desired objectives of serving Motorway and Trunk Road traffic at an environmental cost that could not be bettered by any of the other sites considered.*

The Need for a Park and Ride Site [4.3, 6.13-6.15, 7.5, 7.12, 7.16, 8.3, 8.71-8.73, 9.17-9.36, 10.10, 10.19-10.26, 11.64-11.65, 13.6, 14.3, 14.7-14.8, 14.14, 14.20, 15.2-15.3 and 15.13]

- 16.107 There is no question that current Government policy in PPG13 and associated and linked publications favour a modal shift from the private car to public transport. As part of this initiative, support is given to the principle of P&R schemes and this is reflected in PPG13_(Annex E), where an 'appropriate' status can now be conferred on P&R schemes in the Green Belt, subject to satisfying five criteria.
- 16.108 As for the development plan, this confirms the desirability of seeking P&R options and solutions, but neither the adopted SP nor the emerging LP identifies the appeal site at Brockworth as a firm location. SP Policy T5 considers P&R in very general terms and the emerging LP Policy TRP10 carries this forward. Both Plans state a preference for a site or sites outside the Green Belt. The Local Transport Plan is also non-specific, identifying a site to the east of Gloucester and preferably near to Jn 11A.
- 16.109 Whereas, the principle of a P&R strategy has been approved by Gloucestershire CC and several full-time sites, and at least one part time site, have been introduced already to serve Gloucester and Cheltenham, future progress seems far less certain. Halcrows were commissioned to prepare a P&R Strategy for Gloucester based on consideration of eight sites identified for them by Gloucestershire CC, six of which had been identified in a previous 1995 Study. Of these, four serving the A40 and A417 to the north and east of Gloucester are in the Green Belt.
- 16.110 In a nutshell, the final draft Report into P&R Strategy recommends the introduction of a P&R site at Elmbridge Court on the A40, to be followed by the assessment of two further sites at Linton and Brockworth. The recommended Strategy concludes that the case for Brockworth is more marginal as Elmbridge Court would very likely serve similar markets to the east side of Gloucester. Also, it is noted in the Halcrow Report that for those sites in the Green Belt Gloucester CyC is investigating the potential for non-Green Belt alternatives. The Halcrow Report does not consider all the possibilities on brownfield and previously developed sites.
- 16.111 The Halcrow recommended Strategy has not completed the full round of Council consideration. However, early indications are that the recommended Strategy will not receive unanimous support. In this respect, very late in the inquiry Tewkesbury BC resolved that "*it is not convinced or persuaded that a Green Belt site needs to be brought forward for P&R provision or that Gloucester City Council has fully*

investigated brownfield non-Green Belt sites within the City boundaries" (Document T9). Further work and consultation is required. Gloucester CyC seeks a further report into the detailed feasibility of the Elmbridge Court site and looks for delivery of the Strategy to be prepared as a joint exercise between the three Councils involved. The Report to Gloucester CC Committees (Document 11) recommends the Strategy contained within the Halcrow Report. However, the CC does not appear to see the Report as an end in itself, but merely a document to inform consideration of Green Belt sites.

- 16.112 As to the P&R proposal forming part of this appeal, the appellants submit that they have carried out a thorough and comprehensive assessment of potential sites to serve the A417(T) corridor and that there are no non-Green Belt sites suitable. In effect, any site further east along the A417(T) would be too far out from the City Centre and any non-Green Belt sites further west towards the city would be beyond the start of the daily congestion. Both locations would materially lessen the benefits and attractiveness of a P&R scheme. On the face of it, this might appear a logical conclusion, but clearly one not, as yet, accepted by all the Councils.
- 16.113 In addition, even if no non-Green Belt, brownfield or previously developed site can be found, it may be sensible to opt for one or two smaller Green Belt sites, rather than one big one. As Tewkesbury BC says, the viability of a smaller site may not be of paramount importance. Many P&R sites are subsidised, and some heavily. For these reasons, I am unable to conclude that a Green Belt site is the most sustainable option, taking account of all relevant factors including travel impacts. In saying this, I note there is no objective assessment of sustainability, specifically for the P&R element.
- 16.114 I am mindful, also, that PPG12^(5.4-5.8) advises that the land use consequences of major transport infrastructure projects should emerge through the development plan process. This also reflects the guidance given in PPG13⁽⁶⁰⁾. This is a laudable aim, allowing everyone input to the emerging policy guidance. Dealing with a particular site on an *ad hoc* basis, therefore, is not the most desirable approach. Notwithstanding, I accept that in some cases this might not be possible, bearing in mind the urgency of introducing a scheme and the fact that the time scale of the development plan process may not fall to accommodate this. Even where this can be countenanced, however, I believe it should accord closely with all the emerging policy and strategy and, therefore, be unlikely to be overturned in any ensuing policy debate.
- 16.115 In this case, it seems to me there are two many inconsistencies and uncertainties to meet this 'test'. Moreover, the commentary of the LTP, where progress is reviewed annually, does not seek to introduce the appeal site, though it does refer to a preferred P&R site near to Jn 11A. In particular, it is the Strategy that is recommended by Halcrow that seems to me to be the starting point and the introduction of a P&R site at Brockworth would not accord with this Strategy. The Councils must decide, therefore, whether to pursue the recommended Strategy or, as Tewkesbury BC and possibly Gloucester City Council recommend, to look for less harmful sites.
- 16.116 In light of the uncertainties prevailing at the close of the inquiry, I believe it would be prudent for the S of S to clarify the position before issuing his decision. In saying this, I

do not suggest that anything fundamental turns on the likely outcome, but it removes the one main avenue of potential uncertainty/ inaccuracy.

- 16.117 In reaching this conclusion, I have not attempted to test in detail the appropriateness of the P&R Strategy recommended by Halcrow. Having said this, it does seem to me that a brief that identifies specific sites does not constitute, of itself, a fully comprehensive survey and investigation. This conclusion is supported by the apparent need for the appellants to consider additional sites in the ES and the inference that there may be other brownfield site options within Gloucester City.
- 16.118 The second point is that the Halcrow Strategy does not consider the implications of Jn 11A becoming an AMJ. Bearing in mind the suggested condition and the S106 Undertaking, this might be deemed pragmatic. There is the distinct possibility that the P&R element could be implemented several years before the AMJ becomes a reality.
- 16.119 Thirdly, I accept that there may be an overestimate of Elmbridge Court by users of the A417 corridor and an underestimate of the use of a Brockworth P&R site by those approaching from the north. Even so, it is likely that Tewkesbury BC did not know this before deciding its response and it will not be known by the other Councils from the Halcrow Report, which does not include such a comment. As it stands, and bearing in mind the Reports so far drafted/ considered by the three Councils, there does not seem to be a mechanism in place to amend/ update the Halcrow Report without issuing further instructions.
- 16.120 Fourthly, I recognise that the potential to introduce bus priority measures between Elmbridge Court and the City Centre is far less than that between Brockworth and the City Centre. On the other hand, at least one objector points out that there may be the potential for a rail connection. However, as this is not something either endorsed or rebutted by the main parties, I have not afforded this any weight. I note, also, that the existing rail line passes some 5-600 metres from the Elmbridge Court site.
- 16.121 Fifthly, there is an undoubted difficulty in gaining access to the Elmbridge Court site. Sixthly, I am not convinced that all the financial options for support and parking charges have been considered. These have the propensity to influence materially the utilisation of any P&R provision. Finally, it has to be recognised that the funding that would follow a grant of planning permission in this case has not been taken into account in the financial deliberations of the three Councils or the Halcrow Report. For example, if the Brockworth site were granted planning permission with the intended contribution from BCL, would this affect the recommendation in the Halcrow Strategy?
- 16.122 There are several other points that might be prayed in aid of the argument that the Halcrow Study needs further refinement. However, these are all matters that should be examined in a different forum. *Having regard to all these matters, I am left with the firm view that the proposed Brockworth P&R scheme is premature, pending more detailed formulation of the joint P&R strategy. Also, it is premature pending the decision following the LP inquiry and recommendations following consideration of the objections.*

- 16.123 In reaching this conclusion and by way of confirmation, I have considered the requirements of PPG13_(Annex E) and the criteria that need to be met before a P&R site can be considered appropriate development in the Green Belt.
- 16.124 As to the first of these, I accept that there is an argument that the Halcrow Study and the additional site investigations undertaken by the appellants constitute a comprehensive assessment of potential alternatives. Even so, as indicated previously, the Halcrow Study has its limitations. Perhaps most importantly, it does not recommend the introduction of a P&R site at Brockworth at this stage. If a P&R scheme was introduced at Elmbridge Court, then it may be that this would cater for a large proportion of the demand from the A417 corridor. If this was the case, then it may be judged that a second Green Belt site should not be forfeit to P&R uses. On the other hand, if the Brockworth site was introduced in advance of Elmbridge Court, then it is possible the scale of Elmbridge Court could be reduced. It would also require the completion of the AMJ before meaningful conclusions about Brockworth could be reached. For all these reasons and those given above, I conclude that there is considerably more work to be done before the assessment could be described as comprehensive.
- 16.125 Turning to the second point, namely demonstrating that the Green Belt site would be the most sustainable, I have no clear answer. The Halcrow Study has considered essentially only Green Belt sites to the north and east of Gloucester. Although I harbour distinct doubts about the realism of brownfield sites within the City of Gloucester this aspect is something not examined in either Study. In this regard, the appellants' consideration as part of the Environmental Statement does purport to consider vacant brownfield sites, but not ones which might be reused or reallocated, for example a site in the GBP. Secondly, if the MSA/TRSA scheme is not granted planning permission then a site to the west of the GBP Link Road might be more sustainable than that currently proposed to the east.
- 16.126 The third point seeks assurance that the P&R site would not "*seriously compromise*" the purposes of including land in the Green Belt. In this case, the Green Belt purposes defined under SP Policy GB1 are maintaining openness and preventing the coalescence of settlements including Gloucester and Cheltenham. In my view, it could be argued that in time, given sufficient recontouring and landscape input the effects on the local Green Belt objectives could be minimised. Even so, the purposes highlighted by the Policy would be compromised. It is only the visual impression that could be limited or contained and, of course, Green Belt is not a landscape designation. In reaching this position, I have afforded less weight to the more local effect of the Green Belt in separating Hucclecote from Brockworth. Although clearly a factor of great local import, the SP does not identify this specifically as a main purpose.
- 16.127 Incidentally, I agree that merely identifying the need for a P&R site does not mean that the least damaging one in the Green Belt will be acceptable. I consider that even if a P&R site is essential, it should only be contemplated in the Green Belt after all non-Green Belt sites have been considered. Even then, the impact on the Green Belt and/or other interests may be such that the benefits may not outweigh the perceived harm.

- 16.128 The fourth criterion requires the proposal to be in the LTP and based on a thorough assessment of travel impacts. Although a review of progress towards achieving the objectives established in the LTP has been submitted in 2001, no scheme for a Brockworth P&R site has been included. Moreover, the travel impacts could not be fully appreciated until there are firm pricing proposals; plans for bus lanes and other bus priorities decided; and parking policy for the City centre agreed. Thus, even if I allow that a full assessment of travel impacts has been undertaken this criterion is not met.
- 16.129 On the final point, there are no suggestions that unnecessary buildings are being proposed. One might, however, raise some doubts about the inclusion of a coach transfer element within the P&R site and the high level of car parking provision. If the parking element was reduced and the coach transfer removed, then the site requirement might be considerably smaller than that currently proposed. Lesser requirements may be accommodated on a smaller site: possibly one discounted in the assessment so far.
- 16.130 *Taking all these factors into account, I do not consider that all of the five criteria are met as intended by PPG13_(Annex E). Consequently the development cannot be considered appropriate in a Green Belt location. Furthermore, bearing in mind my conclusions on the emerging strategy and the prematurity of the Brockworth proposal, I do not consider that there are any very special circumstances to outweigh the presumption against inappropriate development in the Green Belt. That is even if the SP Policy GB1 allowed such 'latitude'.***
- 16.131 In a nutshell, it is clear that the proposed P&R scheme would not accord with paragraph 3.17(c) of PPG2: Green Belts as amended by PPG13: Transport _(Annex E).

Other Material Considerations

Visual and landscape arguments [3.4, 3.6-3.9, 7.8, 8.54-8.65, 8.74, 9.52, 10.27-10.40, 13.6-13.9, 14.9, 14.11, 14.15, 15.7, 15.13 and 15.16]

- 16.132 Should the proposal be granted planning permission, then there is no suggestion that the appellants have not incorporated the best landscape prognosis available to them. Some of the planting already in place following the introduction of Jn 11A and the upgrading of this section of the A417 would be lost, to be replaced by new planting that would take some time to reach a similar stage. From the residential properties to the south and east, views would change. In particular, the extent of many views would be contained and foreshortened. Thus, from some vantage-points particularly to the east, views of Churchdown Hill would be lost, either immediately or as landscape planting matures. Having said this, I am mindful that no-one has an inalienable right to an uninterrupted view and I am confident that no-one would be left with an unacceptable outlook. In some cases, one that contains and/ or obscures the M5 and Jn 11A may be judged preferable. Finally, as indicated previously, the identity of the Brockworth and Hucclecote 'villages' would become blurred.
- 16.133 Considering views from further afield, I am in no doubt that from a limited number of vantage points both during the day and at night there would be a perception of extended

development. From the south and east, I believe this would reduce the visual link with the countryside beyond. Thus, it is from the Cotswold AONB Scarp that the Green Belt would be perceived as materially undermined. From Churchdown Hill to the north north west, the loss of open land on the opposite side of the motorway and between the motorway and the proposed business park extension and residential development proposed would be closer, though in some ways less noticeable, even during the hours of darkness. In both cases, however, contouring and landscape proposals could lessen the visual impact.

- 16.134 The footpaths that would be retained and the new one provided attract mixed feelings. Clearly the new one behind the houses in Brockworth would be an advantage and replace the informal one used by locals at present. However, the benefit must be tempered by the fact views to the north and west would be foreshortened. Those that exist could be intensively landscaped, but I anticipate people walking them would always be conscious that the area is more intensively developed than before. Moreover, the reduction in openness would introduce greater severance of the residential areas to the south from the open countryside to the north, beyond the A417. As for the existing footpaths, they would be well screened and landscaped, but as a consequence would offer less open views to users.
- 16.135 Taking all these visual and landscape factors together, I do not consider they constitute a compelling reason for withholding planning permission, but nevertheless must be seen as a moderate, negative factor to be balanced in any equation.

Noise [6.10-6.12, 7.9, 7.14, 8.75-8.77, 13.3-13.5, 13.7, 14.3, 14.5-14.6, 14.9, 14.12, 14.15 and 15.16]

- 16.136 It is demonstrated by the noise evidence, unchallenged by the Tewkesbury BC, that the increases in noise levels following the development would not be inordinate and of themselves do not constitute a supportable reason for refusal. Nevertheless, the noise environment at some locations, including sensitive ones, would increase. Although not material, when comparing them with today's levels, any increase will have followed increases due to the introduction of Jn 11A, the construction of the A417 and the more recent construction of the GBP Link Road. In each case, I have no doubt that the resultant noise climate expectation was not judged to be untenable. Notwithstanding this, the introduction of progressive noise creep is something that should not be ignored. Nor should the introduction of noise sources producing noise at different frequencies. Thus, whereas I accept there is no objective or tangible evidence to suggest that the present noise climate would deteriorate materially, it should be recognised in any exercise that this low level of additional intrusion is on top of what I am sure has been a progressively deteriorating noise climate over the previous 10 to 20-years.

Lighting [3.5, 7.9, 7.14, 8.78-8.79, 13.2, 13.4, 13.7, 14.3 and 15.16]

- 16.137 I am quite clear that when looking from certain vantage points the undeveloped nature of the appeal site offers a dark or black stretch of land within an otherwise active and in some places already lit area. This is particularly so from some of the bedroom windows of properties near by. Although one must consider lighting introduced in the near and middle ground against the existing lighting in the background there is still a small

negative factor. Even using lower lighting columns with maximum cut-off would still present a glow from the reflection at ground level and from vehicles. As for headlights, the contouring of the land should enable the effects to be largely designed out. However, I am not certain that this is so with the present indicative layout and masterplan.

Air pollution [7.9, 7.14, 8.80-8.82, 13.4, 13.7, 14.1, 14.3, 14.5-14.7, 14.9, 14.12 and 15.16]

16.138 On much the same lines as I have considered noise, I accept that the increases in air pollution would not be inordinate. Once again, however, in some locations around the appeal site the existing situation already fails to meet desirable standards. The appeal project would not improve the situation and would introduce some minor worsening. Although this is not BCL's overt position, it is not a correct approach to imply that the air quality battle has been lost and therefore further small increases in pollution should not attract much attention. The fact that air quality standards in some of the relevant area are not met counts as an argument against the project, to be balanced in the equation.

Drainage [6.7-6.9, 7.14, 8.83-8.84 and 15.9]

16.139 Although concerns have been expressed about the integrity of the Horsebere Brook and the other drainage proposals for the scheme, I am satisfied that there are no fundamental objections. Any necessary discussions on matters of detail could take place before the submission of details. My justification for this conclusion is based largely on the responses of the responsible authorities such as the Environment Agency.

Other matters

16.140 Parties at the inquiry raised several matters. For my part, I have found no evidence that any ecological interest would be materially harmed. In fact, there is support for the proposals from some of the responsible authorities. Similarly, I am confident that arrangements could be made for the investigation and protection of any archaeological interest in the vicinity. [6.2-6.6, 8.79, 14.15-14.16, 15.9 and 15.13]

16.141 As for economy and crime, there would be benefits and disbenefits. On the plus side, there would be the creation of jobs that would be welcome in the locality. This may be offset by some losses at parallel enterprises such as hotels and garages, but I agree that the balance should be positive. Any potential for increases in crime is inevitably emotional. Unfortunately, I am aware of no objective evidence to support neighbours' fears. Consequently, I have not found this factor crucial. [8.85-8.88, 14.2, 14.12, 15.1 and 15.12]

16.142 Turning to concerns over house prices and health, the former is something that planning legislation is not designed specifically to cover. It is the public not the private interests that are of paramount importance. If protecting house prices were a fundamental principle of the planning system, it would allow one individual to prevent or inhibit the interest of another or public interest. Clearly health is always an emotive subject when considering proposals such as these. However, without some tangible or even anecdotal

evidence, it would be wrong to afford health issues any great weight. [13.3, 13.4, 14.1, 14.9, 14.12 and 15.13]

- 16.143 Finally, I see a distinct advantage in having dedicated open space in this vicinity as opposed to the passive open space that might remain for the future. In this regard, I would be concerned that the area of land designated for the P&R site could lay unkempt for a number of years before the scheme reaches fruition. In my view, this should be avoided and in the event planning permission is granted I will recommend a condition to avoid this possibility.

Summary

- 16.144 *In summary, I have found none of these factors either individually or cumulatively contribute a compelling reason for resisting the proposal. I am conscious that those living in the area have undergone significant change over a long period of time and whatever happens in this case the extension of the business park and the new residential development proposed will introduce further changes. Thus, although there are some negative factors, if the S of S concludes that the public interest would be served by a MSA on this site, I do not consider that these present an insurmountable objection. They are degrees of harm that would be outweighed by the demonstration of a compelling need for the transport elements proposed.*

Agreement and Conditions

- 16.145 A signed Section 106 Agreement ^(Document 8) has been submitted with BCL, Tewkesbury BC and Gloucestershire CC among the signatories. The Agreement deals with a number of topics and would come into force upon the date outline planning permission is granted. It embraces an obligation to carry out the development in accordance with the Master Plan; the completion of highway works to make M5 Jn 11A and AMJ prior to the opening of the MSA for use by the general public; the provision of footpaths, cycleways; the submission of a Travel Plan for approval by the County Council; the setting aside of land for the P&R proposal at no cost to the Council along with a commuted sum of £900,000 to be used for no other purpose than to secure the provision of this P&R facility; to provide open space land as indicated on the Master Plan; to submit a detailed specification for the MSA landscape and maintain that in accordance with a Landscape and Conservation Strategy; to observe and perform the principles of sustainability in respect of construction of the MSA and ensure that any occupiers observe similar principles in respect of their designs, specification and working practices; and, finally, to promote safe road practices within the MSA.
- 16.146 Save in two respects, I accept that the agreements and undertakings contained within the S106 Agreement are relevant and necessary for the completion of the integrated proposal. The first of these pertains to the commuted sum of £900,000 for the P&R scheme. This is not supported by any objective submission in terms of estimates for capital works or ongoing support for the scheme once in being and operative. I see this being particularly difficult in terms of paragraph 8.5 of the Agreement, which requires repayment of any part of the said sum not spent. As I read the Agreement, this would

preclude support for the scheme beyond the 5-year period. The S of S may wish to clarify this aspect.

- 16.147 The second point concerns the provision of highway improvements and in this regard it should be noted that, theoretically, the Agreement would allow the P&R scheme to be implemented prior to completion of the AMJ facility at the M5 Jn 11. This would preclude the proposed Brockworth P&R scheme being utilised to its maximum potential as a prior alternative to the Elmbridge Court scheme. As such, it would cater primarily for traffic using the A417 corridor. Perhaps more importantly, to allow one element of an integrated and interdependent scheme to proceed at an earlier stage would have the potential disadvantages I have highlighted previously (16.3-16.9).
- 16.148 On a more general matter, concern was expressed at the inquiry about the P&R land, should the option to provide a facility be delayed or not be taken up by Gloucestershire CC. In this respect, there is no provision for treatment of the land in the intervening period. As I see it, this could be for up to 15-years. As adjacent areas may be taken out of agricultural use, this may leave the P&R element of land to the east of the GBP Link Road too small for viable use, it could become overgrown and unsightly without treatment. To rectify this point, I have suggested that in the event that planning permission is granted an appropriate condition be added to address this concern.
- 16.149 Turning now to the draft conditions (Document 9), discussions took place on the appropriateness of these. Where comments are not made on specific conditions, I believe these do satisfy the tests of Circular 11/95, though the precise wording may need amending to reflect the model conditions.
- 16.150 It will be noted that Condition 3 requires the development to be begun before the expiration of 10-years from the date of any planning permission or the expiration of 7-years from the date of approval of the last of the reserved matters to be approved, whichever is the later. This condition contains the longer than normal time scales to reflect the advice offered by the HA about the length of process to secure the necessary Special Road Orders etc. Although it is clearly unfortunate that such a lengthy time scale is envisaged, the HA is best able to appreciate the likely progress. The consequences, however, are that these procedures could sterilise promotion of or improvement to any other site and could also prejudice promoting a P&R scheme on the land covered by any planning permission for the MSA/TRSA. The S of S may wish to investigate this further, but on the information before me, I see no reason to change the wording of draft Condition 3.
- 16.151 Draft Conditions 11, 12 and 13 are required to tie in any future development with the environmental effects anticipated by the Environmental Statement. This is necessary owing to the nature of the application, which is outline only.
- 16.152 The access referred to in draft Conditions 16 and 17, is the roundabout access off the Gloucester BP Link Road and not to the upgrading of Jn 11A. This should be clarified in the wording.

- 16.153 Those conditions referring to drainage arrangements should include reference to employing sustainable drainage systems.
- 16.154 Insofar as the noise conditions are concerned, any scheme submitted to the local planning authority should include the facility to control the external effects of HGVs with refrigeration units by creating a parking location away from residential properties, with the opportunity/requirement to hook up to a mains facility during night time hours.
- 16.155 The suggested noise Conditions 28 to 30 proffered by Tewkesbury BC and the appellants are different in several respects. I believe these conditions need refining, though I am more inclined to follow the draft advanced by the BC. In my view, greater consideration needs to be given to noise at a stage when the features of the development are known in fuller detail.
- 16.156 In respect of retail floorspace within the proposed MSA, Tewkesbury BC has added a further suggested condition restricting the retail sales of certain classes of goods. In its view, this is necessary to help avoid the MSA becoming a destination in its own right and reflects a condition attached to the Catherine de Barnes permission ^(Document BCL3). In my opinion, the need for this Condition is dependent upon the provisions of the Signing Agreement issued by the HA. Having said this, in the light of the Catherine de Barnes decision this might indicate that the Agreement does not contain such restrictions and, for an MSA near to residential areas, as in this case, they might be judged necessary.
- 16.157 Insofar as the Police rest room and safety area are concerned, no separate planning permission is needed for this facility and, consequently, I do not believe that a condition in the form proposed is necessary.
- 16.158 In addition to the suggested draft conditions, I consider that a scheme of fencing and boundary treatment, particularly around the Horsebere Brook area should be submitted to the local planning authority prior to commencement of works. Clearly any scheme approved should then be implemented at the appropriate stage and retained thereafter. As indicated previously, I consider that an additional condition should be added to cover the treatment of the area of land proposed for the P&R scheme in advance of the option contained within the Section 106 Agreement being taken up by Gloucestershire CC.

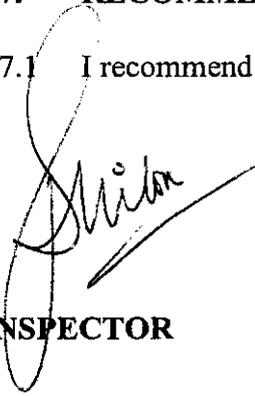
Summary of Conclusions

- 16.159 *I am uncomfortable about leaving consideration of the proposals for the AMJ at Jn11A of the M5 until a later, and possibly much later, date. Moving on, I find that the proposal on this site located within the Cheltenham/Gloucester Green Belt would be inappropriate in all its aspects. The proposed development would conflict with the objectives of the Green Belt highlighted in SP Policy GB1. As for the proposed P&R scheme, I do not consider that at the current stage of events this proposal satisfies the tests included in PPG13(Annex E). Accordingly, this element would also be inappropriate development in the Green Belt. On this basis, the SP Policy GB1 precludes the development. The development would also run contrary to the other development plan policies designed to protect undeveloped land. Nor can any specific support for the scheme be drawn from the extant or emerging development plan policies.*
- 16.160 *As for there being material considerations of such significance as to indicate reaching a different outcome, this is where the Whitty Statement and other factors come into play. In this regard, I do not consider that the requirements implicit in the Lord Whitty statement of July 1998 are satisfied to a sufficiently material extent. In particular, I am not persuaded that the need for an additional MSA is justified on the basis of safety and/or need. Implicit in the current policy guidance I see a need to consider the potential for extension and improvement and upgrading of the signing and access at Strensham and Michaelwood before seeking an infill site. Even though the Strensham southbound scheme has commenced, it is the potential and ability to improve the facilities further at both MSAs that I find compelling.*
- 16.161 *As to the higher than normal accident record, I have considered this in both general accident and specifically SRVA terms. In my opinion, the general accident rate is comparatively low for the stretch of M5 in question and, at best, the evidence on SRVA inconclusive in either statistical or actual terms. Insofar as the question of risk or potential for accidents, I am mindful that accidents are random, multi-factor events and that a perceived hazard does not necessarily result in a tangible risk. I accept that there are potential hazards on this section of the M5, but this does not manifest itself in an equivalent level of risk, as evidenced by the accident records.*
- 16.162 *Based on the present operation regime at Michaelwood and the closures that occur for much of the year, I consider that spreading the demand more thinly could lead to further closures if not threaten the viability of one or more of the MSAs. As for the proposed Hucclecote/Brockworth MSA itself, I foresee that a low turn-in rate might create operational difficulties from the start.*
- 16.163 *There may be stronger arguments for a new TRSA facility. Even so, I consider that the demand has not been demonstrated in any objective sense and, certainly, no forcible accident reasons have been advanced. Turning to evaluate alternative sites, I am satisfied that no potential infill MSA site on the M5, suggested by any of the parties, would serve the purposes of both the Motorway and Trunk Road (A417) as well as the Hucclecote/ Brockworth proposal.*

- 16.164 *Looking at the P&R proposal, I agree in large measure with the arguments arrayed against the scheme. In essence, the strategy and/or policy is not sufficiently developed or robust to identify a P&R scheme at Brockworth as a foregone conclusion. I accept that P&R schemes per se are a favoured plank of current Government transport policy, but this does not necessarily mean that all proposals should be allowed. In this case, the current site recommended to Gloucestershire CC is at Elmbridge Court, followed by a review of other sites. The Tewkesbury BC view is that there should be no P&R schemes permitted in the Green Belt until full investigation of non-Green Belt sites have been undertaken. Gloucester City Council affirms this last point and reference is made to this view in the Halcrow Report. For these reasons, I consider that the P&R element of the integrated proposal is premature, pending firming up the strategy and subsequent proposals.*
- 16.165 *Incidentally, I have strong sympathy with the view expressed in PPG12 and PPG13 that as a major, integrated transport proposal both the MSA/ TRSA and P&R elements of the appeal scheme should more appropriately be driven by their inclusion in the development plan and LTP. I am conscious that the development plan in so far as it exists and in its emerging state does not identify specific schemes on the appeal site. Furthermore, the LTP offers little or no encouragement for the schemes proposed by the Strategy.*
- 16.166 *Turning to the other impacts, I have not found anything crucial. I accept that the proposals would have an adverse effect on views into the sites from local vantage points and across the sites in the wider context. I concur also, that the introduction of more pollutants in terms of emissions to air, lighting and noise can only worsen and would not improve the environment for those living nearby. Furthermore, the loss of open and undeveloped separation between Hucclecote and Brockworth would lead to a greater loss of identity for the two communities.*
- 16.167 *Taking all these factors into account, I am convinced that the proposal would be contrary to the prevailing planning policy framework and that there are no other material considerations to justify allowing this appeal.*

17. RECOMMENDATION

17.1 I recommend that the appeal be dismissed.

A handwritten signature in black ink, appearing to read "Milton", is written over the text "17.1". The signature is stylized and includes a long horizontal stroke extending to the right.

INSPECTOR

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APPEARANCES FOR TEWKESBURY BOROUGH COUNCIL

Mr R Hanson, Solicitor and Legal Associate of the RTPI Oldstones, School End, Aynho,
Banbury, OX17 3BS – instructed by
the Borough Secretary and Solicitor,
Tewkesbury Council

He called

Mr C J Shaw BA (Hons) DipTP MRTPI Director of Development Services,
Tewkesbury Borough Council

APPEARANCES FOR ROADCHEF MOTORWAYS LTD

Mr M Druce Of Council – instructed by RPS
Chapman Warren, Town Planning
and Environmental Consultants,
Fairwater House, 1 High Street,
Wroughton, Swindon, Wiltshire, SN4
9JX

He called

Mr J Thomson BA DipLA MLI Senior Associate Landscape Architect
with Macgregor Smith

Mr C J Simpkins BA (Hons) MRTPI Operational Director for RPS
Chapman Warren, Swindon,
Wiltshire

APPEARANCES FOR WELCOME BREAK GROUP LTD

Mr R L Fookes Of Council – instructed by Hepher
Dixon, Town Planning Consultants,
100 Temple Chambers, Temple
Avenue, London, EC4Y 0HP

He called

Mr P G B Dixon MA MRICS MIMT Partner in Hepher Dixon, Town
Planning Consultants

Mr J Raybould General Manager of the
Michaelwood Motorway Service
Area, M5

APPEARANCES FOR THE HIGHWAY AGENCY

Mr J Litton

Of Council – instructed by the
Highways Agency Legal Services
Department

He called

Mr C Farnham BSc MSc CEng MICE

Area Manager for the Highways
Agency, South West Network
Strategy Division

Mr H G Davies BSc MTD MIHT MCIT

Associate Director of Colin
Buchanan and Partners, Traffic and
Transportation Planning Consultancy
of 23 Trenchard Street, Bristol, BS1
5AN

Mr P Yates BSc (Hons) CEng MICE MIHT

Associate within the Development
Planning Group at Colin Buchanan
and Partners, Trenchard Street,
Bristol**APPEARANCE FOR HUCCLECOTE PARISH COUNCIL**

Mrs M Head

Councillor and resident, Council
Office, Pineholt Village Hall, Bird
Road, Hucclecote, Gloucester, GL3
3SM**INTERESTED PERSONS AND PARTIES**

Mr R Pring

20b Westfield Road, Brockworth,
Gloucester, GL3 4AR

Mr C Porter

15 Barclay Close, Hucclecote,
Gloucester, GL3 3TG

Mr G Browning

Brockworth Parish Councillor of 43
Green Street, Brockworth,
Gloucester, GL3 4LU

Dr M A Cham

63 Green Street, Brockworth,
Gloucester, GL3 0LX

Mrs D Roberts

50 Sussex Gardens, Hucclecote,
Gloucester, GL3

Mr A Bailey	85 Sussex Gardens, Hucclecote, Gloucester, GL3
Mr P Hesling	97 Sussex Gardens, Hucclecote, Gloucester, GL3 3SP
Mr J Provis	113 Sussex Gardens, Hucclecote, Gloucester, GL3 3SP
Mr R Nichols	35 Court Road, Brockworth, Gloucester, GL3 4ES
Mr L Hendry	Brockworth Parish Council, 73 Ermin Street, Brockworth, Gloucester, GL3 4EH
Mrs D Harwood	Parish Councillor of 91 Ermin Street, Brockworth, Gloucester, GL3 4DF
Councillor D Ford	29 Castlemill Drive, Brockworth, Gloucester, GL3 4BQ
Councillor M Hendry	County and District Councillor of 73 Ermin Street, Brockworth, Gloucester, GL3 4EH
Mr Davis	1 Maple Drive, Brockworth, Gloucester, GL3 4DW
Sergeant Pickersgil	Gloucester Police
Mr R Hews CEng	Halcrow Group Ltd, authors of the Gloucester Park and Ride strategy final report

DOCUMENTS

Note: Documents marked with an * are not included with the report and have only been shown for completeness

INQUIRY DOCUMENTS

Document 1. Attendance lists

Document 2. Letter of notification and circulation list

Document 2A Notification of adjourned Inquiry

- Document 2B Notification of Inquiry resumption
- Document 3 Application and supporting documentation including original Environmental Statement and amending the site boundary
- Document 4 Questionnaire and responses to the application when advertised by the Council
- Document 5 Written responses to the Inquiry advertisement
- Document 6 Correspondence on the readvertisement of the amended Environmental Statement
- Document 7 Draft 106 Agreement
- Document 8 Sealed 106 Agreement
- Document 9 Suggested conditions submitted by Tewkesbury Borough Council and Bryant Central Ltd
- Document 10 Letter from the Highways Agency dated 16 October 2001
- Document 11 Letter from Gloucestershire County Council dated 10 December 2001 including report on Gloucester Park and Ride strategy to go to the 12 December 2001 cabinet
- Document 12 Letter re Park and Ride from WSP Development to Mr C Shaw Tewkesbury Borough Council
- Document 13 Fax from Chris Edgar Gloucestershire County Council to Chris Shaw, Tewkesbury Borough Council
- Document 14 Answers to my questions on noise from Mr Duce
- Document 15 Answers to my questions on economics from Mr Balch
- Document 16 Agreed cross sections
- Document 17 Proposed layout Michaelwood MSA M5 southbound
- Document 18 Restraint designations within the vicinity of the appeal site
- Document 19 Plans showing the boundary of Tewkesbury Borough Council
- Document 20 Copy of Halcrow Group Ltd Gloucester Park and Ride Strategy – Final Report (September 2001)
- Document 21 Revised Environmental Statement (August 2001)
- Document 22 Statement of common ground
- Document 23 Agreed statement in connection with all movements junction at Jn 11A M5

CORE DOCUMENTS

- CD1(a) Planning Application submitted 22 October 1997 (Ref 97/9439/1119/OUT)
- CD1(b) Additional information submitted in support of Application No. 97/9439/1119/OUT
- CD1(c) Brockworth Motorway Service Area Traffic Impact Assessment. WSP Graham Development Limited (April 1998)
- CD1(d) Brockworth Motorway Service Area Response to Comments Received on Traffic Impact Assessment. WSP Graham Development Limited (November 1998).
- CD1(e) Brockworth Motorway Service Area Stage 1 Assessment Report. WSP Graham Development Limited (February 1998)
- CD1(f) Brockworth Roundabout – Supplementary Report. WSP Graham Development Limited (February 1999)
- CD1(g) Environmental Impact Statement, Proposed Motorway/Trunk Road Service Area, Park and Ride Facility and Junction Improvements together with its appendices and non-technical summary. Shaw Crammond Environmental Planning (January 1999)
- CD1(h) The Need for a Motorway/Trunk Road Service Area, Park and Ride Facility and Junction Improvements. Shaw Crammond Environmental Planning (February 1999)
- CD2 Planning Committee Report dated 5 December 2000
- CD3 Relevant extracts from the Gloucestershire Structure Plan Second Review (November 1999)
- CD4 Relevant extracts from revised Deposit Draft Tewkesbury Borough Local Plan (February 2001)
- CD5 Relevant extracts from Gloucestershire Local Transport Plan (July 2000)
- CD6 PPG1 – General Policy and Principles
- CD7 PPG2 – Green Belts
- CD8 PPG7 – The Countryside Environmental Quality and Economic and Social Development
- CD9 PPG11, Regional Planning (October 2000)
- CD10 PPG13 Transport (March 2001)
- CD11 PPG13 Transport, Annex A Motorway and Road Side Service Areas (March 1994)

CD12	PPG24 – Planning and Noise
CD13	RPG10 – Regional Planning Guidance for the South West
CD14*	Roads Circular 4/88
CD15*	Circular 23/92 MSAs, Department of the Environment (August 1992)
CD16*	Roads Circular 1/94 MSAs, Department of Transport (May 1994)
CD17	HA 269 The “Whitty” announcement on tests for New MSAs
CD18*	A New Deal for Transport: Better for Everyone, DETR (July 1998)
CD19*	A New Deal for Trunk Roads in England, DETR (July 1998)
CD20	Brockworth Motorway Service Area M5 Junction 11A Modifications Technical Note – Scope of Work. WSP Graham Development Limited (October 2000)
CD21	A417 Brockworth Bypass, A417 M5 to A40 (Elmbridge Court) Local Model Validation Report, Frank Graham (January 1991)
CD22	A417 Brockworth Bypass, Forecasting Report, Frank Graham (February 1991)
CD23	A417 Brockworth Bypass, Economics Report, Frank Graham (December 1990)
CD24	A417 Brockworth Bypass Engineering, Proof of Evidence of J R Wigginton, Frank Graham (November 1991)
CD25	A417 Brockworth Bypass Traffic, Economics, Noise and Air Quality Statement, Proof of Evidence of ADR Tetley, Frank Graham (October 1991)
CD26	A417 Brockworth Bypass Traffic, Economics, Noise and Air Quality Appendices, Proof of Evidence of ADR Tetley, Frank Graham (October 1991)
CD27	Brockworth MSA/TRSA Technical Report 2 Transportation Modelling. WSP Graham Development Limited (January 2001)
CD28*	Design Manual for Roads and Bridges (DMRB) Volume 5, Assessment of preparation of Roach Schemes
CD29*	Design Manual for Roads and Bridges (DMRB) Volume 6, Road Geometry
CD30*	Design Manual for Roads and Bridges (DMRB) Volume 8, Traffic Signs and Lighting
CD31*	Design Manual for Roads and Bridges (DMRB) Volume 11, Environmental Assessment
CD32*	Design Manual for Roads and Bridges (DMRB) Volume 12, Traffic Appraisal of Roads Schemes

- CD33* Design Manual for Roads and Bridges (DMRB) Volume 13, Economic Appraisal of Roads Schemes
- CD34 Brockworth and Quedgeley Transport Strategy Halcrow, (September 1998)
- CD35 Letter from PINS 28 November 2000 – recovered appeal – SS
- CD36 Rule 6 Statements
- CD37 Planning Policy Guidance Note No. 17 (September 1991) – Sport and Recreation
- CD38 Planning Policy Guidance Note No. 23 (1994) – Planning and Pollution Control
- CD39 Draft Planning Policy Guidance Note No. 25 – Development in Flood Plains
- CD40 Gloucestershire Structure Plan – Third Review Issues Report (February 2001)
- CD41 Tewkesbury Borough Council Local Plan – First Deposit Draft (November 1998)
- CD42* The Air Quality (England) Regulations 2000
- CD43* Transport 2010: 10 year plan (DETR July 2000)
- CD44 Working in Partnership – The Highways Agency Strategic Plan for Integration (Highways Agency March 2001)
- CD45* Lighting in the Countryside: Towards Good Practice: DETR (February 2001)
- CD46 Technical report on Supplementary Study to the 1998 Environmental Impact Statement Local Air Quality Impact
- CD47 Traffic Advisory Leaflet (March 1996)
- CD48 Bike and Ride, Traffic Advisory Unit DOT (April 1996)
- CD49 Park and Ride Prioritisation Study, Gloucestershire County Council (April 1996)
- CD50* Guidance Note for the Reduction of Light Pollution: Institution of Lighting Engineers (2000)
- CD51 S16 Highways Act 1980
- CD52* RPG 10 – South West

Documents submitted by Bryant (Central) Ltd

Document BCL/RJS/1* Mr Shaw's proof of evidence

Document BCL/RJS/2 Appendices to Mr Shaw's proof

Appendix 1	Site Location Plans
Appendix 2	Illustrative Site Layouts
Appendix 3	Environmental Statement (Separate Document)
Appendix 4	Supplement to the Environmental Statement (Separate Document)
Appendix 5	Architectural Statement and Detailed Drawings (Separate Document)
Appendix 6	Officers' Report to Committee
Appendix 7	Consultation Document on MSA Deregulation
Appendix 8	Press Notice 215 August 1992
Appendix 9	PPG13 Annex A and Roads Circular 1/94
Appendix 10	Department of Transport Evidence to the Prior Committee and Prior Committee Report
Appendix 11	MSA Spacing on the National Motorway Network
Appendix 12	Frequency of MSAs pre and post deregulation
Appendix 13	MSA Spacing on the M6 Motorway
Appendix 14	MSA Spacing on the M5 Motorway
Appendix 15	MSA Spacing on the M1 and M40 Motorways
Appendix 16	Circular 4/88
Appendix 17	Stationery Office Information on Motorway Traffic Speeds
Appendix 18	Speed Distribution by Vehicle Type
Appendix 19	Traffic Flows Past Sandbach MSA in Opening Year (Comparison with Brockworth)
Appendix 20	Traffic Flows Past MSAs at Year of Opening (Comparison with Brockworth)
Appendix 21	Lord Whitty's Announcement and the MSA Policy Statement 1998

Appendix 22	Letter from Highways Agency Strategy Unit
Appendix 23	Slip Road Positions on the M5 between Strensham and Michaelwood
Appendix 24	Survey of MSA Users and Survey Verification
Appendix 25	Survey Results
Appendix 26	Extract of the Stroud Local Plan and letter from Stroud District Council
Appendix 27	Accident Records on this stretch of the M5
Appendix 28	Extracts from PPG13
Appendix 29	Letter from the Highways Agency on signing
Appendix 30	Plan of Second Severn Crossing, M4
Appendix 31	Services on the A417(T)
Appendix 32	Spacing of Trunk Road Services
Appendix 33	Planning Decisions on A417(T) Services Applications
Appendix 34	Extracts from Draft RPG10 December 2000
Appendix 35	Centurion Garage and Little Chef
Appendix 36	Extracts from Gloucestershire Local Transport Plan
Appendix 37	Extracts from Gloucester City Plan
Appendix 38	Sustainability Statement
Appendix 39	Gloucester Business Park Approval
Appendix 40	Letters from Gloucestershire County Council Planning
Appendix 41	Section 106 Agreement (see Document 8)
Document BCL/RJS/2A	Additional appendices to Mr Shaw's evidence
Appendix 1	OS Plan of the Gloucester area
Appendix 2	Slip road locations on the M5
Appendix 3	Letter from the Highways Agency dated 6 July 2001

Appendix 4	Traffic speeds update 1998
Appendix 5	Traffic speeds update 1999
Appendix 6	Travel times
Appendix 7	MSA decisions, spacing and traffic volumes
Appendix 8	MSA spacings M42, M3, M1, M6/M56
Appendix 9	TRA spacings A1 and A1(M)
Appendix 10	Stafford north bound MSA photographs (May 2001)
Appendix 11	OS Map showing roundabouts on A417/A40
Appendix 12	Suggested amendments to conditions
Appendix 13	Distances to MSAs along the M3/M27
Appendix 14	Extract from Gloucestershire Local Transport Plan 2000
Appendix 15	Letter from Stroud District Council dated 18 June 2001
Appendix 16	Letter from F P D Savills dated 11 June 2001
Appendix 17	Letter from Moto re Chieveley Service Area Junction 13, M4/A34 – dated 5 November 2001
Appendix 18	Report to Gloucester City Council re Park and Ride strategy dated 17 October, 15 November and 22 November 2001
Appendix 19	Strensham south bound critique of proposed MSA redevelopment
Appendix 20	Extract from Gloucestershire Local Transport Plan – first annual progress report: August 2001
Appendix 21	Photographs taken at Michaelwood south bound MSA – 27/28 July 2001
Appendix 22	Existing service facilities on the A417
Appendix 23	MSA spacings on M6, M1, M60/M61/M62, M5, M41/M40, M4, M20 and M27

Document BCL/RJS/3* Mr Shaw's summary proof of evidence

Document BCL/PJ/1* Mr P Jones proof of evidence

Document BCL/PJ/2	Appendices to Mr Jones' evidence
Appendix A	Extract from Decision Letter, Catherine De Barnes MSA
Appendix B	Regional Factsheet for the South West, A New Deal for Trunk Roads
Appendix C	Regional Factsheet for the South West, Government 10 Year Plan for Transport
Appendix D	Extracts from Gloucestershire Local Transport Plan
Appendix E	Extract from A417 Brockworth Bypass Statement of Reasons
Appendix F	Extracts from Commissioning Report – A417 Brockworth Bypass and A417 M5 to A40 (Elmbridge Court)
Appendix G	Consultation Leaflet, A417 M5 to A40 (Elmbridge Court
Appendix H	Extract from Environmental Statement, M5 Junction 12 Improvement
Appendix I	Traffic Evidence to Public Inquiry, M5 Junction 12 Improvement
Appendix J	Extracts from M5 Junction 12 Options Report, July 1999
Appendix K	A417 Brockworth Bypass, Before and After Study
Appendix L	Extract from Inspector's Report, Gloucester Business Park Inquiry
Appendix M	Extract from Parkman TIA, Gloucester Business Park
Appendix N	Schedule of GBP development plots, Strutt and Parker
Appendix O	Correspondence with Tewkesbury BC on GBP land use assumptions
Appendix P	Extract from Inquiry decision, M40 MSA Hedgerley Lane
Appendix Q	Parliamentary Answer by Lord Whitty, July 2000
Appendix R	Extract from Motorway User Model Report
Appendix S	Notes of meeting with Gloucestershire Police
Appendix T	Extract from Inquiry decision, Ongers Farm MSA, M5
Appendix U	Correspondence submitted to Ongers Farm Inquiry
Appendix V	Letter from Paul Castle Consultancy, 14 June 2001

Appendix W	Extract from DETR Statistics Bulletin. Traffic in Gt Britain, 1 st Quarter 2001
Appendix X	Paper submitted by Road Haulage Association
Appendix Y	Letter from Gloucestershire Ambulance Service 13 June 2001
Appendix Z	Schedule of Accidents on A417 westbound to M5 northbound loop road
Appendix AA	Supplementary Safety Audit Report, June 2001
Appendix BB	Trunk Road service area and layby occupancy and spacing
Appendix CC	M5 at Strensham Services (northbound) – peak parking demand
Appendix DD	Michaelwood Motorway Service Areas: Stage 1 Road Safety Audit
Appendix EE	Proposed redevelopment of Michaelwood Services: critique
Appendix FF	Recent traffic growth, local motorway and other road networks
Appendix GG	Technical note on turn-in rates
Appendix HH	Technical note on MSA access times
Appendix II	TRANSYT results, Brockworth roundabout – 2020 a.m. and p.m. peaks
Appendix JJ	Extract from Transport in the Urban Environment
Appendix KK	Average new car fuel consumption: 1978-1999
Appendix LL	Passenger transport fuel consumption, passenger miles and their ratio: United Kingdom: 1970-1999
Appendix MM	Extract from Gloucestershire Economic strategy
Appendix NN	Circular 1/94 calculation for Michaelwood and Strensham
Appendix OO	Note on link length and accidents
Document BCL/PJ/3	Correspondence with the Highways Agency
Document BCL/PJ/4*	Summary proof
Document BCL/PJ/5	Drawings
Document BCL/PJ/6	Report on survey

Document BCL/PJ/7	Model
Document BCL/PJ/8	Forecasts
Document BCL/PJ/9	June 2001 Transport Impact Assessment
Document BCL/PJ/10	NATA
Document BCL/PJ/11*	Mr Jones' supplementary proof
Document BCL/PJ/12	Appendices to Mr Jones' supplementary proof
Appendix S1	Further correspondence with Colin Buchanan and Partners
Appendix S2	Correspondence with Halcrow Fox and Gloucestershire County Council
Appendix S3	Extract from TD16/93: Roundabouts
Appendix S4	Technical note on manual traffic assessments
Appendix S6	Additional drawings
Document BCL/PJ/15*	Mr Jones' Second Supplementary Proof of Evidence
Document BCL/PJ/15A	Figures to Mr Jones' Second Supplementary Proof
Figure PJ/S2/1	Variation in daily traffic flow, M5 junctions 13-14 (Michaelwood)
Figure PJ/S2/2	7 day average and Saturday traffic flows, M5 junctions 13-14 (Michaelwood)
Figure PJ/S2/3	Current and forecast Saturday traffic flows, M5 junctions 13-14 (Michaelwood)
Figure PJ/S2/4	Michaelwood services: existing layout
Document BCL/JS/1*	Mr Stevenson's proof of evidence
Document BCL/JS/2	Appendices to Mr Stevenson's proof of evidence
Appendix 1	Countryside character
Appendix 2	Tewkesbury Borough Council Landscape Officer's Report
Appendix 3	Gloucestershire County Council Report
Document BCL/JS/3*	Mr Stevenson's summary proof
Document BCL/JS/4*	Rebuttal material from Mr Stevenson

Document BCL/JS/5	Panoramas
Document BCL/JS/6	Additional appendices to Mr Stevenson's
Appendix 1	Gloucester Business Parks supporting statement
Appendix 2	Gloucester Business Park supporting statement: amendments to supporting statement text and figures
Appendix 3	Gloucester Business Park off site link road: supplementary supporting statement
Appendix 4	Letter from Tewkesbury Borough Council dated 15 June 2001
Appendix 5	Letter from Tewkesbury Borough Council dated 9 October 2001
Document BCL/TC/1*	Mr Cross's proof of evidence
Document BCL/TC/2*	Mr Cross's summary proof
Document BCL/TC/3*	Mr Cross's supplementary proof
Document BCL/TC/4	Appendices, figures etc to Mr Cross's proofs
Appendix 1	Patronage forecasting agreed statement Halcrow and BCL
Figure TC 1/1	Site location
Figure TC 1/2	Park and Ride potential bus routes
Figure TC 1/3	Other Park and Ride sites
Figure TC 1/4	Pedestrian and cycle links
Figure TC 1/5	Existing bus routes
Figure TC2/1	Other Park and Ride Sites
Figure TC2/2	Distances of routes into Gloucester city
Figure TC2/3	Existing bus routes
Table TC1/6	Park and Ride comparison matrix
Table TC2/4	Access of the assessment of the alternative sites
Drawing TC1/7	Park and Ride facility: Car park layout
Document BCL/JAH/1*	Professor Horne's Proof of Evidence

Document BCL/JAH/2	Appendices to Professor Horne's Proof
Appendix 1	Figures showing distribution of road traffic accidents and sleep related vehicle accidents
Appendix 2	Paper entitled "Sleep related vehicle accidents" represented from the British Medical Journal 4 March 1995
Appendix 3	Article entitled "Falling asleep whilst driving" from the Institute Journal of Legal Medicine
Appendix 4	Article entitled "Evaluation of in-car counter measures to sleepiness: Cold air and radio published by Research Laboratory, Loughborough University
Appendix 5	Article entitled "Vehicle accidents related to sleep": A review published in occupational and environmental medicine
Appendix 6	Study of sleep related vehicle related accidents – 1998/20 M5 Junctions 8–14, Gloucestershire
Appendix 7	Consensus statement: Fatigue and accidents in transport operations
Document BCL/JAH/4*	Rebuttal of evidence produced by Highway Agency
Document BCL/CHB/1*	Proof of Evidence of Mr Balch
Document BCL/CHB/2	Appendices to Mr Balch's evidence
Appendix 2.1	Travel to work and Local Authority areas map
Appendix 2.2	Locus figures and table on local economy
Appendix 2.3	Ward Map and appendices of multiple deprivation
Appendix 2.4	Gloucester city centre town profile
Appendix 2.5	Economic strategy for Gloucestershire
Appendix 2.6	Extract from Gloucester City Council's economic development strategy 2000/2001
Appendix 2.7	Urban Design Strategy for Gloucester City centre
Appendix 2.8	Summary of central Gloucester initiative
Appendix 2.9	Routes to success
Document BCL/CHB/3*	Mr Balch's summary proof
Document BCL/MRF/1*	Mr Forsdyke's Proof of Evidence

Document BCL/MRF/2*	Mr Forsdyke's summary of Proof of Evidence
Document BCL/KW/1*	Mr Wade's proof of evidence
Document BCL/KW/2	Figures to Mr Wade's proof evidence
Figure 1	Viewpoint locations
Figure 2	Viewpoint photographs night and day
Figure 3	External lighting design proposals
Document BCL/KW/3*	Mr Wade's summary proof of evidence
Document BCL/DD/1	Mr Duce's Proof of Evidence
Document BCL/DD/2	Appendices to Mr Duce's evidence
Figure 1.	The site, surrounding area and location of noise monitoring sites
Table 1.	Results from the continuous unattended noise measurements made at Location 1 (77 Sussex Gardens) from 19 March to 20 March 2001 over 1-hour and 5 minutes time periods.
Table 2.	Day and night time noise results from the attended measurements made at Location 2 (representative of the noise levels in the area of 127 Sussex Gardens).
Table 3.	Day and night time noise results from the attended measurements made at Location 3 (2 Prince Albert Court).
Table 4.	Day and night time noise results from the attended measurements made at Location 3 (17 Maple Drive).
Table 5.	Day and night time noise results from the attended measurements made at Location 5 (representative of the noise levels in the area of 214 Hucclecote Road).
Table 6.	Representative day and night time noise levels at Positions 1 to 5.
Table 7.	Noise measurements made at existing MSAs and Park and Ride sites.
Table 8.	The noise levels for the main construction activities derived from the guide to sound level data on site equipment and site activities as given in BS5228: 1997, Annex C.
Table 9.	Predicted construction noise levels at the façade of receptors surrounding the development during the main construction activities.
Table 10.	The significance of the day time noise impact at the façade of receptors

surrounding the development during each of the main construction activities.

Table 11. Comparison of the outdoor criterion of 55dB(A) $L_{Aeq,T}$ at receptors surrounding the development to the predicted noise levels during each of the main construction activities.

Table 12. Comparison of the measured existing levels of noise at receptors surrounding the development to the predicted noise levels each of the main construction activities.

Table 13. The cumulative construction noise impact.

Table 14. Vibration limits to control disturbance and building damage.

Table 15. Existing and future with and without MTRSA traffic noise levels.

Table 16. Comparison of existing and with and without.

Table 17. Calculation of the entitlement for noise insulation treatment under the Noise Insulation Regulations.

Table 18. Fixed plant noise criteria to assist in the design of the proposed facilities.

Table 19. The predicted levels of noise at the façade of noise sensitive receptors from activities on the proposed MTRSA and Park and Ride sites.

Table 20. Noise assessment in accordance with BS 3132: 1997 of the likelihood of complaint during the day and night time operation of the proposed MTRSA and Park and Ride sites.

Table 21. Comparison of the free-field day time outdoor criterion of 55dB(A) $L_{Aeq,T}$ at representative receptors surrounding the development to the predicted noise levels during the operation of the proposed MTRSA Park and Ride site.

Table 22. Comparison of the predicated noise during the operation of the proposed MTRSA and Park and Ride site to the criteria advised by BS 8233: 1999.

Table 23. Comparison of the measured existing day and night time levels of noise at receptors surrounding the development to the predicted noise levels during the operation of the proposed MTRSA and Park and Ride site.

Glossary of Terms

References

Appendix 1. Description of the positions of the noise measurement sites.

Appendix 2.Notes of meeting with Tewkesbury Borough Council held in March 2001 and issued in March 2001.

Appendix 3.Tewkesbury Borough Council written confirmation of agreement with WSP Acoustics noise measurements.

Appendix 4.Noise Assessment Criteria.

Document BCL/DD/3*Mr Duce's summary Proof of Evidence

Document BCL/RM/1 Mr Murdoch's Proof of Evidence

Document BCL/RM/2 Plan including with Mr Murdoch's evidence showing watercourses at map

Document BCL/RM/3* Mr Murdoch's summary Proof of Evidence

Additional BCL Documents

Document BCL/1 Appeal Decision Lea End Farm, Hopwood (Junction 2, M42).
Appeal Ref. A/94/236819 and A/95/249270

Document BCL/2 Appeal Decision proposed motorway service areas A40

Document BCL/3 Appeal Decision motorway service areas M42 including that at Catherine de Barnes.

Document BCL/4 Parking requirement based on Roads Circular 1/94 with a 15% turn-in rate at Michaelwood southbound.

Document BCL/5 Footpaths in the vicinity of the appeal site.

Document BCL/6 Indicators of Secretary of State approach to lodges.

Document BCL/7 Appeal Decision for mixed use development Ref No.WMR/P/5105/223/12 dated 14 November 2001.

Documents submitted by Tewkesbury Borough Council

Document T1* Proof of Evidence from Mr Shaw.

Document T2 Appendices to Mr Shaw's evidence.

Appendix T2.1 Letter dated 28 November 2000 issued by Planning Inspectorate

Appendix T2.2 Council's Rule 6 Statement and Committee Report

Appendix T2.3 Letter from Gloucestershire County Council dated 24 May 2001

Appendix T2.4	Section 9 of Gloucestershire Structure Plan Second Review
Appendix T2.5	Response in relation to Policy TRP15 and Policy TRP23
Appendix TR.6	Secretary of State decision letter dated 27 November 1995
Appendix T2.7	Appeal decision in relation to MSA proposals at Junction 12 of M5 and Ongers Farm, Brookthorpe
Appendix T2.8	Plan
Document T3*	Summary Proof
Document T4*	Supplemental Proof from Mr Shaw
Document T4A	Appendices to Mr Shaw's supplemental Proof
Appendix 1	Gloucester Park and Ride Strategy: Final Report (September 2001)
Appendix 2	Extract from the Gloucestershire Plan Second Review (adopted November 1999): Policy T5 and explanation
Appendix 3	Extracts from Tewkesbury Borough Local Plan to 2011 (revised deposit) January 2001: Policy TRP10 and reasoned justification
Appendix 4	Annex E to PPG13 (2001)
Document T5	Reports to Tewkesbury Borough Council on the Halcrow Park and Ride strategy
Document T6	Proposed office development at Elmbridge Court, Gloucester: site location
Document T7	Gloucester Business Park and Brockworth Airfield masterplan
Document T8	Planning permission granted by Cotswold District Council for extension to garage/shop complex at the Centurion Garage, Gloucester Road, Duntisbourne Abbots, Cirencester : dated 1 May 2001
Document T9	Additional information supplied by Tewkesbury Borough Council including clarification of Green Belt designation and minute relating to Park and Ride strategy (20 November 2001)
Document T10	Draft report to the Gloucester Strategic Planning and Transport Committee into Gloucester Park and Ride strategy produced by Halcrow dated 12 December 2001
Documents submitted on behalf of Road Chef Motorways Ltd	
Document RCML1*	Proof of Evidence submitted by Mr Simkins

Document RCML2	Appendices to Mr Simkins' Proof of Evidence
Appendix 1	Site Plan
Appendix 2	Circular 1/94
Appendix 3	Gloucestershire Structure Plan Extracts
Appendix 4	Extract from Panel's Report
Appendix 5	Extract from North Environs Local Plan
Appendix 6	Tewkesbury Borough Plan 2 Deposit Extract
Appendix 7	Extract from comments on representations and proposed amendment
Appendix 8	Appeal Decision – Ongers Farm
Appendix 9	Appeal Decision – land at Junction 12
Appendix 10	Appeal Decision – Harwick Court – Junction 12
Document RCML3*	Summary of Proof of Evidence from Mr Simkins
Document RCML4*	Proof of Evidence from Mr Thomson
Document RCML5	Appendices to Mr Thomson's proof
Appendix 1	Parliamentary answer regarding the status of AONB landscapes
Appendix 2	Extracts from the 1991 Department of Transport A417 Brockworth By-Pass Environmental statement and addendum statement of the same year
Appendix 3	Appeal Decision letter for the A4 Junction 16 – Swindon Park and Ride development.
Document RCML6	Landscape and visual impact figures submitted by Mr Thomson
Figure JDT1	Landscape context
Figure JDT2	1998 Ordnance Survey Map
Figure JDT3	Existing landscape provision
Figure JDT4	1994 Ordnance Survey Map
Figure JDT5	1:25000 Map
Sheets 1 – 5	Photographs

- Document RCML7* Mr Thomson's summary proof
- Document RCML8 Mr Thomson's supplementary Proof of Evidence
- Document RCML8A Appendices to Mr Thomson's supplementary landscape proof
- Appendix JDT/S/1 Adjusted landscape character figure
- Appendix JDT/S/2 Adjusted landscape character figure with the development
- Appendix JDT/S/3 Additional photographs
- Document RCML9* Mr Thomson's updated summary and rebuttal evidence
- Document RCML9A* Mr Thomson's rebuttal response to Mr Stevens' points
- Document RCML10 Annotated photograph overlays
- Document RCML11 Strensham Redevelopment Proposals
- Document RCML12 Proposed elevations for new amenity building at Strensham southbound
- Document RCML13 Landscape redevelopment masterplan
- Document RCML14 Strensham Lodge Occupancy rates
- Document RCML15 Copy of representation made by BCL to the Tewkesbury Borough Local Plan 2011

Documents submitted by Welcome Break Group Ltd

- Document WB1* Proof of Evidence from Mr Dixon
- Document WB2 Appendices of Mr Dixon's Proof of Evidence
1. Qualifications and Experience
 2. Welcome Break
 3. Gloucestershire Structure Plan (extract)
 4. Tewkesbury Local Plan Revised Deposit (extract)
 5. Representation by Welcome Break Group Limited
 6. HA269
 7. Road Circular 1/94
 8. Inspector's Decision – Onger's Farm

9. Secretary of State's Decision Letter and Inspector's Report – NE Quadrant, Junction 12
 10. Inspector Decision – Hardwick Court Estate and Summerhouse Farm, Junction 12
 11. Inspector's Decision – Droitwich
 12. Inspector's Decision – Worcester
 13. Traffic Signs Agreement
 14. Trading Figures
 15. 2001 Planning Permission – Michaelwood
 16. 2000 Planning Permission Strensham
 17. Trunk Road Service Facilities A417/A419
 18. Committee Report: November 1995
- Document WB3* Mr Dixon's Summary Proof of Evidence
- Document WB4* Rebuttal Proof of Evidence submitted by Mr Dixon in regard of Professor Horne's evidence
- Document WB5* Mr Raybould's Proof of Evidence
- Document WB6 Appendices to Mr Raybould's Proof of Evidence
- Appendix 1 Letter from FBD Savills dated 31 October 2001 in connection with the Michaelwood MSA proposed improvement
 - Appendix 2 Summer Sales v Rest of the Year at Michaelwood
 - Appendix 3 Catering sales trend for the year 2001 to end October
 - Appendix 4 Overview of week's sales
 - Appendix 5 Plans of the proposals for upgrading the Michaelwood motorway services area at southbound and northbound
- Document WB7 Appeal Decision in relation to motorway service area in the Allerton/Harrogate areas
- Document WB8 Appeal Decision into motorway service proposal in the St Albans and Dacorum districts
- Document WB9 Appeal Decision into motorway service area proposal in the area of Maidenhead at Great Wood

Document WB10	Decision in respect of a Park and Ride Development at the Junction of the A4259, Swindon
Document WB11	Turn-in rates at Michaelwood
Document WB12	Parking provision at Michaelwood based on factors of Road Circular 1/94 between 2001 and 2020
Document WB13	Appeal Decision into motorway service area proposals on the north east quadrant of the M25
Document WB14	Personal injury accidents on the M5 unction 8 to Junction 14: 1998 to 2000
Document WB15	Drivers hours and tacograph rules for goods vehicles in the UK and Europe
Document WB16	MSA appeal decision for a site at Lea End Farm, Hopwood (Junction 2, M42)
Document WB17	Appeal decisions into MAS proposals for land adjoining Junction 8/9 of the M4 motorway at Maidenhead.

Documents submitted by the Highways Agency

Document HA1*	Mr Farnham's Proof of Evidence
Document HA1A*	Mr Farnham's Summary of Proof of Evidence
Document HA1R*	Mr Farnham's rebuttal/supplementary proof of evidence
Document HA1RD	Documents to Mr Farnham's rebuttal/supplementary proof
ANNEX A	M5 Junction 11A MSA showing motorways in the area
ANNEX B	Extracts from road for prosperity
ANNEX C	Extracts from M5 Junction 17 – 21 Stage 1 climbing lanes
ANNEX D	Extracts from Circular 11/95: The Use of Conditions in Planning Permissions
ANNEX E	Glossary of Terms
Document HA2*	Mr Davies' Proof of Evidence
Document HA2A	Mr Davies' of Proof of Evidence
Document HA2R*	Mr Davies' Supplementary Proof of Evidence

Document HA2RD Appendices to Mr Davies' Supplementary Proof of Evidence

1. Traffic model report (bound separately)
2. Model link flow validation summary
3. Analysis ATC data M5 J13-14: 1999 & 2000
4. Michaelwood and Strensham: observed traffic flows
5. Michaelwood and Strensham: observed parking occupancy
6. Michaelwood and Strensham: observed turn in rates
7. Chieveley MSA observed turn in rates
8. Glossary

Document HA3* Mr Yates' Proof of Evidence

Document HA3D Appendices to Mr Davies' Proof of Evidence

Appendix 1 Extracts from W F P June 2001 supplementary TIA:

Appendix H Safety Audit Report and Design Team Response

Document HA3R* Rebuttal Proof of Evidence to Professor Horne and Mr Jones' evidence submitted by Mr Yates

Document HA3RD Documents submitted with Mr Yates' rebuttal proof

ANNEX 1 Articles from The Times of 25 July and 6 August 2001

ANNEX 2 Drivers sleepiness is a cause of road traffic accidents on the Warwick section of the M40 during 1995 and 1996

ANNEX 3 Accidents on the motorway network in England

ANNEX 4 "Think" campaign on driver fatigue

ANNEX 5 Glossary of Terms

Document HA4* Further evidence in response to Mr Jones' response produced by Mr Farnham

Document HA5* Supplementary proof of Mr Yates addressing Professor Horne's evidence

Document HA6 Annexes to Highways Agency evidence

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- HA1-1 Extracts from Policy for Roads: England 1978
- HA1-2 Extracts from Highways Agency: Framework Document July 1999
- HA1-3 Extracts from Highways Agency: Framework Document April 1994
- HA1-4 Extracts from Highways Agency Business Plan 2001/02
- HA1-5 Letter dated 4 December 1997 from WSP Consulting Engineers to Highways Agency
- HA1-6 Letter dated 4 December 1997 from Highways Agency to WSP Consulting Engineers
- HA1-7 Minutes of Meeting of 25 May 1999
- HA2-8 Summary of correspondence from Highways Agency and Colin Buchanan and Partners to Applicant and Agents to 8 June 2001
- HA2-9 Correspondence from Highways Agency and Colin Buchanan and Partners to Applicant and Agents to 8 June 2001
- HA2-10 Extracts from representations by Tewkesbury Borough Council to A417 Brockworth Bypass Public Inquiry
- HA2-11 Representation by Bruton Knowles to A417 Brockworth Bypass Public Inquiry on behalf Bryant Homes and others
- HA2-12 Letters dated 25 June 1991 and 18 October 1991 from Highways Agency to Tewkesbury Borough Council
- HA2-13 Letters dated 29 October 1991 from Department of Transport to Bruton Knowles
- HA2-14 Extracts from Southern Area Traffic Monitoring A417/A419/A420 Year 2000 Annual Report prepared by Babbie Group on behalf of Highways Agency
- HA2-15 Extracts from M4/M4 Widening Sub-Regional Traffic Model, Local Model Validation Report, revised March 1993
- HA2-16 Extracts from The Travel Effects of Park & Ride, Final Report prepared by WS Atkins on behalf of the DETR
- HA2-17 Paper presented to the English Historic Towns Forum, Park and Ride workshop 27 June 1990 by Oxford City Council
- HA2-18 Accident data supplied to Colin Buchanan and Partners by WS Atkins

HA2-19	Accident data supplied to Colin Buchanan and Partners by Gloucestershire County Council
Document HA7	M5 Junction 11A MSA traffic model report submitted by Mr Davies
Document HA8	Highways Agency Area 2 Road Accident Review 1999
Document HA9	Area 2 Road Accident Review 1999 supplement
Document HA10	Letter to Highways Agency from South West Regional Assembly dated 15 November 2001
Document HA11	Motorway links, AADTs for 1997/98
Document HA12	Table 4.16 from Transport Statistics 2000
Document HA13	Accident rates for motorways
Document HA14	Lay-bys on the A417/A419 routes
Document HA15	Letter from Colin Buchannan & Partners dated 18 July 2001 re M5 Michaelwood Services, proposed redevelopment
Document HA16	M5 Michaelwood service area Stage 1 safety audit, October 2001
Document HA17	Paul Castle Consultancy traffic data collection and presentation specialists, automatic traffic counts and parking surveys at Strensham and Michaelwood MSAs, August 2001
Document HA18	Highways Agency's answers to outstanding issues including Signing Agreement
Document HA19	Trunk Road service areas
Document HA20	Additional journey lengths for motorway traffic to visit the proposed MSA and potential accident rates
Document HA21	Parking provision at Michaelwood MSA

Documents submitted by Hucclecote Parish Council

Document HPC1	Photographs and written submissions
Document HPC2	Plan showing extent of Hucclecote Parish Council