

**REPORT**

**RELATING TO AN ASSESSMENT OF NEED**

**CONCERNING**

**PROPOSED SERVICE AREA SITE**

**LAND ADJOINING ROUNDABOUT INTERSECTION OF M180 AND A15 AT  
BARNETBY INTERCHANGE, BARNETBY, NORTH LINCOLNSHIRE**

**PREPARED**

**BY**

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## **1.0 Introduction and Purpose of Statement**

- 1.1 This statement has been prepared to consider and evaluate the issue of “need” for roadside facilities in relation to proposals by Lindum Group Limited and Brocklesby Estate (“the Applicant”) to develop a new service area on land (“the Service Area Site”) adjoining Barnetby Interchange, being a grade-separated junction of the east-west M180 and A180 route with the north-south A15 and A18 roads.
- 1.2 In this statement I will set out the national policy framework in relation to roadside facilities and briefly describe the concept and purpose of a modern roadside service area. I will then assess the accessibility and qualities of the location of the Service Area Site and review the proposed roadside facilities.
- 1.3 I will then provide details of the traffic flows passing the Service Area Site and consider the extent to which the needs of motorists, including drivers of Heavy Good Vehicles (“HGVs”), for roadside facilities are met by current service area provision on this part of the road network. Within this process I will review the existing service area provision on the various routes that the Service Area Site could serve and identify effective gaps in provision.
- 1.4 I will then describe the factors affecting the trading potential of roadside facilities and consider the suitability and potential of the Service Area Site in relation to these factors. This exercise will include an assessment of the ability of the Service Area Site to satisfy need on this stretch of the strategic road network.

## **2.0 Qualifications and Experience**

- 2.1 My full name is Timothy David Hancock. I hold the degree of Bachelor of Science in Geography from the University of Leicester, am a Fellow of the Royal Institution of Chartered Surveyors and a Member of the Energy Institute. As the Director of Tim Hancock Associates Limited, I specialise in the acquisition, assessment and valuation of petrol filling stations and service areas throughout the UK.

- 2.2 In my professional capacity I have over 40 years' experience in property matters and since the late 1980s have worked principally in the roadside sector with particular emphasis on service areas and roadside restaurants.
- 2.3 I have been employed variously as Investment Surveyor, Property Manager and Acquisition Manager to Mobil Oil Company Limited, ("Mobil"), Real Estate Project Manager to BP and Head of Property to City Centre Restaurants Limited.
- 2.4 I established Tim Hancock Associates in 1999 and specialise in the assessment, volume estimation, valuation, acquisition and development of petrol filling stations and service areas in the United Kingdom as well as compulsory purchase and compensation matters, acting for the major oil companies and dealer groups as well as advising public sector clients including Highways England, Channel Tunnel Rail Link and Transport for London and various local authorities in relation to petrol filling stations and service areas.
- 2.5 I am very familiar with the concept of roadside facilities, having acted in relation to the acquisition and development of such facilities as well as their subsequent management. I provide for example a note of some of the facilities where I have had direct involvement in relation to their development: Reading Motorway Service Area ("MSA"); Warwick MSA; Stafford MSA; Boreham Interchange Trunk Road Service Area ("TRSA"); Hardwicke Services, Gloucester; Kettering Services, A14; Nacton Services, A14; Brentwood Services, A12; Colchester Services, A12; Seven Bridges Services, A419; Bedford Services, A248; Martlesham Heath Services, A12; Barton Mills Services, A11; Chelmsford Services, A131; Braintree Services, A120; Stansted Airport Services, A120; Scole Services, A140, Blue Bell Hill Services, A229; Pevensey Services, A27; Ashington Services, A24 as well as dealing with the refurbishment, valuation and assessment of trading potential of innumerable roadside facilities throughout the United Kingdom since the late 1980s.
- 2.6 I regularly prepare assessments of need in relation to proposals to develop roadside facilities on behalf of oil companies, dealer groups and developers to assist the planning process.

2.7 I have inspected the Service Area Site, its location and the principal roadside facilities on the relevant parts of the strategic road network. I have not had any previous direct involvement with the Service Area Site.

### **3.0 Plans**

3.1 Plan Number 1 shows the location of the Service Area Site and its relationship with the road network it would serve if developed as a modern roadside facility. This Plan is provided at Appendix 1 to this report.

3.2 Plan Number 2 shows an extract of the Strategic Road Network (“the SRN”) plan, focusing on the sections that are of particular relevance in relation to the contribution that the Service Area Site would make if developed as a roadside facility. This Plan is provided at Appendix 2 to this report.

3.3 Plan Number 3 shows the location of the Service Area Site and the principal roadside facilities that currently exist to serve those sections of the road network under consideration. These will tend to be larger-scale facilities that are capable of making a significant contribution to meeting the needs of road users on these routes. These facilities will generally serve all categories of road user, including commercial drivers of HGVs and so can cater for all categories of traffic. This Plan is provided at Appendix 3 to this report.

3.4 Plan Number 4 shows the location of the Service Area Site and the secondary roadside facilities that currently exist adjoining those relevant sections of the road network under consideration. These will tend to be smaller-scale facilities and their contribution to meeting the needs of road users on these routes may be less because of their limited size or range of facilities. These facilities will not generally serve all categories of road user. This Plan is provided at Appendix 4 to this report.

3.5 Plan Number 5 provides details on the electric vehicle charging network on the relevant section of the main road network. This plan is provided at Appendix 6.

3.5 Plan Number 6 shows the proposed layout for the Service Area Site under drawing reference number 190824 – SK04, provided as Appendix 7 to this report.

- 3.6 Plan Number 7 identifies traffic volumes in the vicinity of the Service Area Site. This plan is provided at Appendix 8 to this report.
- 3.7 Plan Number 8 shows the preferred route of the A46 Newark Bypass improvement scheme, along with drawings of individual roundabout junction improvements. This plan is provided at Appendix 10 to this report.

#### **4.0 Summary of Principal Findings**

- 4.1 This report notes that government policy promotes the provision of a network of roadside facilities to meet the needs of all road users in the interests of road safety to allow regular stops to be taken for rest and to satisfy their welfare needs for refreshment and toilet facilities and to refuel their vehicles. The distance between such facilities should not be greater than 28 miles and there is a need for all categories of vehicle to be served. More recently, the direction of emerging policy has been to ensure that appropriate facilities are available for HGV drivers and for facilities that support new vehicle propulsion technologies including charging capacity for EV vehicles.
- 4.2 Given this policy background it is evident that roadside facilities to serve long distance routes will need to be conveniently located to satisfy the needs of road users. This will imply the need for these facilities to be located close to the main route and often in open countryside to meet spacing requirements.
- 4.3 To avoid the proliferation of roadside facilities and ensure that they are sustainable and commercially effective, it follows that the best sites will generally be those that conveniently meet the needs of road users travelling on a number of routes and cater for all categories of traffic. These facilities need to satisfy the criteria identified for effective roadside facilities and in particular be conveniently accessible to high volumes of passing traffic.
- 4.4 My review of the Service Area Site confirms that it is well located close to a key interchange on the network of principal roads and that passing traffic volumes are high in absolute terms. Moreover, its nodal location would allow it to serve traffic using many different routes at one well located facility. The facilities proposed

comprise those expected from a modern high quality service area designed to meet the needs of all categories of traffic.

4.5 My review of the many principal routes used by road users passing the Service Area Site confirms that there is a significant number of gaps in the existing provision of roadside facilities that exceed the minimum distance in policy terms of 28 miles. Road users travelling on these routes consequently have to travel an excessive distance before finding roadside facilities and their need for roadside facilities are not currently satisfied.

4.6 Consequently, and in conclusion, I find that there is a significant unsatisfied need in terms of the provision of roadside facilities on this section of the national road network that the development of the Service Area Site would address. The provision of modern roadside facilities at this location would make a significant contribution to meeting the needs of these road users. In particular, such facilities would meet the needs of HGV drivers and address road safety and welfare needs as well as supporting improved supply chain policy objectives.

## **5.0 Policy Relating to Roadside Facilities**

5.1 Whilst planning policy considerations will principally be considered by the Applicant's planning consultant as required, I will set out the policy context for roadside service facilities within this statement.

5.2 Since the development of a network of high-speed roads in the United Kingdom the Department of Transport ("the DfT") either directly or previously through National Highways and its predecessors as their agent, has consistently promoted the development of a network of service areas to meet the needs of the travelling public and commercial vehicle drivers. Essentially, these needs are for the provision of hot and cold food, the ability to park and rest and purchase fuel and use toilet facilities. Increasingly, these needs additionally include the ability to rapidly recharge electric vehicles by providing EV charging facilities.

5.3 The National Planning Policy Framework 2021 ("NPPF") provides informative policies in relation to the development of roadside facilities under paragraph 106 e).

Footnote 44 to this paragraph includes a specific reference to roadside facilities as an example of the type of facility contemplated in paragraph 106 e). This footnote also specifically confirms that, “the primary function of roadside services should be to support the safety and welfare of road users”. It should be appreciated however, that national planning policy does not impose a 'need test' for roadside service facilities which are not 'large scale'. Although I have been instructed to consider the need for the proposed development in this statement, it is not a 'large scale' facility and there is no requirement at the national policy level to demonstrate 'need'.

- 5.4 The relevant national policy statement is Circular 2/2013 (“the Circular”), entitled ‘Strategic Road Network and the Delivery of Sustainable Development’. The policy set out within the Circular is currently under review following a statement made on 8<sup>th</sup> November 2021 by the Secretary of State for Transport (“the Statement”). Within the Statement it was confirmed that the policy would be updated in particular to “*fully reflect the importance of providing logistics and freight*”. This confirms a requirement to address widely recognised deficiencies in the need to better support facilities for commercial HGV vehicles. To ensure that relevant evidence is available to assist local planning authorities in considering planning applications for roadside facilities, it was also confirmed that the DfT would be “*updating the National Lorry Parking Survey to ensure strong evidence is available on the national picture in future*”. It is widely considered that the importance of facilities for commercial drivers and their vehicles has often been overlooked, although for some time the DfT has been urging the operator’s committee for MSAs to make greater investment in relation to the provision of facilities for HGVs, particularly with regard to overnight parking. Difficulties in the haulage sector following the pandemic and Brexit has brought the importance of the sector into sharp focus and the Statement concludes that “*The need for a reliable and efficient supply chain has recently come into sharp focus. It is therefore essential that we put in place mechanisms that deliver a supply chain network that is secure, reliable, efficient, and resilient, with no link in the chain overlooked*”. The provision of a network of effective roadside facilities, including proper provision for HGV parking is an essential part of the logistic supply chain within the UK. A copy of the Circular and the Statement are provided as Appendix 9 to this report.

- 5.5 Although there is still no detail as to the timescales for an update in policy to reflect the concerns raised in the Statement, a formal consultation has been completed over the Summer of 2022. This has sought responses in relation to an updated draft policy document which retains the principles of the Circular but reflects the issues raised in the Statement. A copy of the draft policy update is provided within Appendix 9 to this report. In particular, greater emphasis is placed on the need to provide facilities for HGV drivers. On motorways, the spacing guidance has been reduced to require HGV facilities in areas of identified need every 14 miles in contrast to the existing spacing criteria which refer the provision of facilities every 28 miles. Similarly, and again in areas of identified need, provision has been made to allow reduced spacing on the all-purpose trunk road network to 20 minutes' drive time. The assessment of identified need will be informed by regular updates to the Department for Transport's Lorry Parking Survey and demand assessments undertaken by National Highways. At present, the existing Circular remains the relevant policy but the increased importance to be attached to facilities for HGV drivers is evident both from the ministerial statement and from this draft policy documentation. A further area of change in the draft revised policy document is increased emphasis on the provision of facilities for zero emissions vehicles, again reflecting a key issue raised in the Statement. This will be a welcome response to the widespread concern over what has been referred to as 'range anxiety' in the press, caused by fear of being stranded because of inadequate recharging infrastructure, particularly when drivers are undertaking longer journeys away from their usual place of residence or work.
- 5.6 Pending the adoption of new policy, the existing Circular remains in force. It is reasonable to anticipate that many of the principles set out within it, which relate principally to road safety and the welfare of road users and which were contained in earlier policies, will be retained but future planning applications will need to be considered against future policy as it emerges. As matters stand, the existing policy does allow a consideration of the needs of both HGVs and their drivers and the drivers of electric vehicles.
- 5.7 Within the Circular, Annex B: Roadside Facilities for Road Users on Motorways and All-purpose Trunk Roads in England, deals with the provision of roadside facilities and refers back in paragraph B2 to the National Planning Policy Framework in general

and in particular in relation to its statement concerning the primary function of such facilities. This circular does not impose a specific requirement to consider “need”, indeed paragraph 9 of the circular confirms that development proposals are likely to be acceptable where they can be accommodated within the existing capacity of the relevant adjoining road network.

- 5.8 Although the Circular applies to motorways and all-purpose trunk roads which are maintained by National Highways and form the SRN, its principles in terms of supporting the safety and welfare of road users apply equally to ‘A’ roads, which are maintained by local highway authorities. There are no specific separate policies in relation to the provision of roadside services on ‘A’ roads.
- 5.9 In considering whether a newly promoted roadside facility should qualify for the display of advance warning signs on its roadside approaches, National Highways in respect of proposals relating to the SRN, and local authorities, for proposals relating to A roads, will consider whether the criteria set out in the Circular are satisfied. In general terms, the erection and display of advance warning signs will be permitted on the road verge approaches where a roadside facility provides the essential services of fuel, hot and cold food, free toilet facilities and a minimum of two hours free parking.
- 5.10 The provision of such advance warning signage which facilitates safe vehicular access to the facilities concerned is generally considered crucial to the commercial success of roadside facilities. This is particularly so where these are located off the main road and not prominent to approaching traffic. In supporting the commercial success of roadside facilities, the provision of advance warning signs plays a strong role in allowing them to meet the objectives of meeting the road safety and welfare needs of motorists. This remains the case, although for some segments of the market including commercial drivers who are familiar with their destination locations and EV drivers who benefit increasingly from in-car information, the role of advanced warning signs is less important.
- 5.11 The SRN and the principal ‘A’ roads feeding into it carry high volumes of traffic over considerable distances providing links between major settlements, including areas of high industrial activity and ports. These roads necessarily run through open

countryside. It follows that to effectively serve the travelling road user conveniently, such facilities will be located close to the main road and to be effective, will often need to be located in the open countryside and therefore outside the boundaries of existing settlements.

- 5.12 Historically, the government was directly involved in the promotion of service areas on the motorway network but these arrangements were deregulated in the early 1990s leaving the private sector to promote roadside facilities. Similarly, it has always been the intention of the Government that the private sector would bring forward schemes for new service areas to meet the needs of the travelling public and commercial drivers on trunk roads and 'A' roads.
- 5.13 It is important to note that the Circular recognises the principle in Paragraph B9 that it is for the private sector to bring forward sites to meet the needs of the travelling public. Importantly, the Circular confirms that where a national operator promotes a site for the provision of roadside facilities, this action, as of itself, provides a strong indication that the needs of the road user on that section of the road network are not being currently satisfied.
- 5.14 Whilst there has been some evolution in policy, the principal approach remains unchanged. The central objective has been one of supporting road safety and welfare for all categories of vehicles, including private cars, and commercial vehicles. A network of service areas should provide opportunities for rest away from the road itself, as well as free toilets, refuelling facilities for a range of vehicle types including HGVs and Light Goods Vehicles ("LGVs") and facilities for the purchase of hot and cold food. Driving on main roads has become increasingly demanding and tiring as traffic volumes and on occasions, traffic congestion have increased. A key requirement is parking provision which must, as noted, include at least two hours free parking. The overall aim is to reduce the risk of tiredness and fatigue and the dangers of running out of fuel on high-speed roads. These risks are seen as particularly serious in relation to HGVs.
- 5.15 Originally the intention was that MSAs would be developed every 30 miles on the motorway networks with infill sites where this was required. More recently, in the

Circular, the spacing criteria have been relaxed. Guidance is provided in the Section entitled 'Spacing'. At paragraph B4 it is noted that Government advice is that motorists should stop and take a break of at least 15 minutes in every 2 hours of driving. The paragraph also notes that drivers of commercial and public sector vehicles are subject to a regime of statutory breaks and working time restrictions and confirms the importance of service areas in assisting compliance with these requirements. Paragraph B5 confirms that the network of service areas on the SRN has been developed to provide opportunities to stop at intervals of approximately 30 minutes, whilst acknowledging that the timing is not prescriptive, since at peak hours and on congested parts of the road network travel between service areas may take a longer period of time.

- 5.16 Paragraph B6 of the Circular relates specifically to motorways and provides a recommendation that the maximum distance between MSAs should be no greater than 28 miles but distances can be shorter. To protect the safety and operation of the road network however, the access arrangements to roadside facilities must comply with the Design Manual for Roads and Bridges. This means that the access arrangements for the proposals must be satisfactory in highways terms.
- 5.17 In relation to TRSAs, the guidance on spacing in paragraph B7 acknowledges that speed limits vary and consequently the same principles are applied to give a drive time between signed roadside facilities on trunk roads of 30 minutes. Again, shorter distances between facilities can be acceptable, subject to the compliance with the Design Manual for Roads and Bridges.
- 5.18 Paragraph B8 confirms that the guidance in the Circular relating to distances between roadside facilities is appropriate for all parts of the SRN and to be in the interests and for the benefit of all road users. This is regardless of traffic flows or route choice. Again, similar concerns over safety apply to 'A' Roads. This means in effect that need can be demonstrated to exist in relation to the requirements of all road users, including road users that select for whatever reason a route that is not the most direct. It must be appreciated that some traffic will have the objective of visiting an intermediate destination and therefore select what at first sight is not the shortest or most efficient route. In practice however, where there are other policy objections it will be necessary to show that there is sufficient need to justify the proposals. Nevertheless, whilst planning authorities should not need to consider the merits of spacing of sites beyond

conformity with the guidance, they must still determine applications on their specific planning merits.

- 5.19 It is widely recognised in the roadside industry that the proportion of traffic turning into a service area site from the nearside traffic flow will be greater than that turning in from the offside flow unless other factors such as competition displace this general rule. This is because motorists prefer to access roadside facilities with the minimum of detour from their journey and crossing the dual carriageways to reach services located on the other side of the road involves a longer detour than when visiting facilities on the same side of the road.
- 5.20 Paragraph B13 of the Circular reflects this industry experience by confirming online facilities are more accessible and therefore more effective in encouraging drivers to stop and take a break. Paragraph B14 confirms that, where all other factors are equal there is a preference for facilities at online locations. Online locations are those served by dedicated slip roads from the motorway or trunk road. Online facilities allow vehicles to access a site without using junctions and consequently as paragraph B13 notes, have the advantage of avoiding any increase in traffic demand on these existing junctions. The consequence is that there is no mixing of motorway or trunk road traffic with the surrounding road network.
- 5.21 The effect of this policy means that two sets of facilities are required to meet the needs of the passing motorist with the provision of a single sided online site on each side of the carriageway to give what is often referred to as a twin sided MSA. Whilst the proportion of passing traffic visiting these sites will tend to be greater, there is in practice a significant cost uplift imposed by the requirement to have two sets of facilities. For this reason, in practice and because of the high cost of construction of new accesses, operators have generally had a preference for junction based offline sites where it has been possible to obtain planning permission on this basis.
- 5.22 An MSA must not act as a destination but serve passing traffic. It is a fundamental and long-standing principle that service areas should meet the needs to the traffic that passes them and not act so as to draw motorists onto the road network. It is well established that a service area should not generate traffic but meet the needs of the passing motorist.

- 5.23 As noted, the purpose of roadside facilities in policy terms is the safety and welfare of the road user. The principle of national policy does not seek to prevent a roadside facility from also meeting the needs of locally generated traffic that is already using the road network. This will include for example, both commuters and commercial traffic.
- 5.24 Consequently, roadside facilities serve traffic using the surrounding road network. This traffic can include road users making passing trips who, having used the facilities, continue on their journey in the same direction of travel, or road users who make a short detour from their route if they are on part of the road network which affords convenient access. Roadside facilities primarily serve traffic which is already on the road network; this is so whether this traffic is making long journeys or comes from the locality but is already on the road network, particularly for commuting purposes. It will be appreciated that roadside services do not generate their own trips in any material way and so comply with the policy requirement that they do not become a destination in their own right. Generally, the fuel pricing policy adopted on main roads will sell fuel at slightly higher prices than at local sites in urban areas. This reflects the higher costs of operating these facilities and further discouraging trips from local areas.
- 5.25 In my experience, roadside facilities are designed to cater for the roadside market of transient traffic and local customers do not make dedicated trips to visit such facilities but prefer to use local service stations and restaurant facilities. Some local traffic will however pass roadside facilities when travelling on longer journeys, but this process does not materially generate additional trips.
- 5.26 Where the minimum facilities noted above, including fuel, refreshments, free toilets and two hours free parking, are provided, a service area will generally qualify for display of advance warning signs on the adjoining motorway or trunk road. Motorists are familiar with these standard services signs. They will often be travelling on unfamiliar roads and forward visibility may be limited but they will look out for them. Motorists rely on these signs to alert them to the existence of roadside facilities ahead.

- 5.27 To reduce congestion on local roads, vehicular access to other non-roadside developments through a roadside facility, is not permitted under the Circular. My experience is that operators endorse this approach as a matter of principle given the operational issues that can arise over shared accesses to backland developments.
- 5.28 The provision of hotel accommodation is not a requirement of either an MSA or a TRSA and consequently not a relevant consideration in the assessment of need.
- 5.29 The criteria to be satisfied for the signing of MSAs and TRSAs are set out in Table B1 of the Circular.
- 5.30 MSAs must trade on a 24-hour 365-day basis and provide two hours free parking for all vehicles, together with free toilets and handwashing facilities without the need to make a purchase. They must also provide fuel and shower and washing for HGV drivers, including secure lockers in the shower and washing area. Hot drinks and hot food must be available at all times for consumption on the premises and there must be a cash operated telephone.
- 5.31 The criteria for MSAs relating to the number of parking spaces for different categories of road vehicle is set out in Schedule 1 of the Circular and is based upon traffic flow.
- 5.32 The 'Rest Area' designation was an attempt to increase the number of facilities on the strategic road network by reducing the required facilities so that these are essentially 50% of those required for an MSA designation. In practice, the Rest Area designation has only been used in a limited number of cases, particularly in the case of existing roadside facilities which were formerly located on trunk roads which have subsequently been upgraded to motorway standards. In these cases, sites have been designated as Rest Areas so that they can continue to make a contribution to the safety and welfare of road users even though they are not capable of satisfying motorway signage criteria, generally because of their limited size.
- 5.33 Truckstops are roadside facilities which are dedicated to providing facilities for HGVs and in some cases LGVs. The criteria for the signage of 'Truckstops on Motorways' are essentially the same of those for MSAs. There is however considerably more flexibility in relation to the number of parking spaces required, as set out in Schedule 1 to the Circular.

- 5.34 In relation to TRSAs, the criteria for signage are again set out in the Circular, which was the first time that MSA and TRSA guidance was set out in a single policy statement. The guidance is again set out in Table B1 under the heading 'APTR service areas'. The guidance for TRSAs is more flexible. They are not required to open 365 days a year but must open for a minimum of 12 hours per day between 8am and 8pm, except Christmas Day, Boxing Day and New Years Day. Again, they are required to have a minimum of two hours free parking for all categories of vehicle and must have free toilets and hand washing facilities without the need to make a purchase. They are also required to sell fuel and hot drinks and hot food for consumption on the premises between 8am and 8pm. Again there is a mandatory requirement to provide access to a cash operated telephone. Essentially therefore, 24-hour operation is not required and there is no requirement to provide shower and washing facilities for HGV drivers. Similarly, provision of hot drink and hot food is not required on a 24-hour basis.
- 5.35 The criteria for TRSAs relating to the number of parking spaces for different categories of road vehicle is set out in Schedule 1 of the Circular and is based upon traffic flow. These requirements are more flexible than those relating to MSAs, with the minimum provision for example being 10 car spaces and 2 HGV spaces.
- 5.36 As noted, there are no specific policies in relation to the provision of roadside facilities on 'A' roads but in practice, similar principles are applied.
- 5.37 In relation to the provision of overnight parking facilities for HGVs, the concerns emphasised in the Statement are also addressed in the NPPF. At paragraph 109 it is stated that *"Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance"*.
- 5.38 These concerns are in fact quite long standing as evidenced by a series of lorry parking surveys that the government has commissioned. It is helpful to consider the most recent surveys. The government undertook the National Survey of Lorry Parking 2017 ("the 2017 Study"); a comprehensive survey of the capacity and utilisation of HGV facilities published in 2018. This drew attention to concerns over a general deficiency in HGV parking provision and amenity facilities for commercial drivers. Most recently, the government has just published a further survey dated September 2022

entitled National Survey of Lorry Parking 2022 – Part One (“the 2022 Study”). The same essential concerns are repeated in this updated study.

- 5.39 A parliamentary petition, which closed on 29<sup>th</sup> October 2020, was entitled ‘Review planning legislation to include facilities for HGV drivers. In detail, the petition called for a review of planning legislation to force councils to include adequate safe and secure HGV parking with refreshment and washing facilities when undertaking major road improvement or construction work.
- 5.40 The government’s response to this petition given on 17<sup>th</sup> November 2020, was that it had already introduced national planning policy which encourages local planning authorities and developers to provide adequate overnight lorry parking facilities where appropriate. The full response refers to the NPPF and confirms that local plans and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages.
- 5.41 In considering existing facilities for HGV parking it is important to note that the provision of private company parking, often associated with commercial premises, is not recognised in policy terms as making a contribution to meeting the needs of HGV drivers using the SRN. Fundamentally, these parking facilities are private and not accessible to the general HGV road user. Consequently, even if such facilities are located close to the SRN, they do not meet the needs of the passing HGV driver. Such facilities will generally will be used by company drivers who are at the start or end of their journey and will not therefore be equipped to meet the needs of the HGV driver in terms of the essential amenities.
- 5.42 The terms of the Statement and the commitment to update the Circular to support a network of roadside facilities that properly cater for commercial vehicles confirm the continuing importance that the government places on its strategy. This will serve not only to support the provision of HGV facilities within the context of the needs of all road users but also the importance of alleviating the nuisance and unsuitability of overnight HGV parking in laybys and undesignated locations, including residential areas.

5.43 The Applicant's planning consultants, Knights, have addressed any particular issues arising from the application of national policy within the context of local policies within the Integrated Planning Statement which has been submitted in support of the planning application.

## **6.0 The Service Area Concept**

6.1 The response of operators to roadside policy and the expectations of the road user has evolved over time. Whilst the first service areas had white tablecloth dining, the motorist now requires a fast and efficient service as dwell times have reduced. Roadside facilities have had to respond to these changing requirements with larger facilities to efficiently cater for higher traffic volumes and all categories of road user. Access from the main road must be convenient. The internal road layout must be safe and efficient. Whilst it is not possible to design service areas to cope with peak demands on the busiest days of the year, there is a commercial requirement to make designs as effective as possible, given the high development and operating costs on these facilities.

6.2 Well located, comprehensive facilities that are capable of meeting the refreshment and fuel needs of all categories of road user have the additional benefit of allowing the road user to satisfy these needs at a single location, reducing the need for additional visits and traffic movements on and off the main road.

6.3 As noted, where the required criteria are satisfied, advance warning signs are provided and remain essential in directing the road user to visit roadside facilities where the forward visibility of the service area is restricted.

6.4 Motorists do not like the time delay associated with searching for facilities away from the main route and service areas that are difficult to access tend to be less successful. As a consequence, where visiting services requires a detour, motorists will tend to travel on through the junction and the safety objective of roadside facilities is not so effectively satisfied. Service areas that are too remote from the main road they serve are not successful in either policy or commercial terms.

- 6.5 Consequently, to be effective in meeting the needs of the motorist, the detour to find services should be relatively short; traffic should not have to travel away from junctions in search of facilities. By locating roadside facilities close to the main road network, motorists' needs are satisfied conveniently close to their route, and they are more likely to stop and rest. In these cases, they do not need to travel off the main road network onto local unfamiliar roads in search of roadside facilities. This avoids the possibility that these vehicles will increase congestion on local roads when searching of facilities and possibly run out of fuel.
- 6.6 Local facilities, particularly petrol filling stations, located within towns are designed to cater for the local population and will be largely ineffective in serving the needs of transient motorists undertaking longer journeys unless they are located directly on the main road and cater for all categories of traffic which will involve as having the physical capacity required. Local facilities are not generally known to the passing motorist who has to search for them and will tend to be too small to meet the needs to the more long-distance motorist. Such facilities therefore make a very limited contribution to meeting the needs of traffic using the strategic road network.
- 6.7 As I have noted, although there is a policy preference for online sites, this is seldom possible to achieve in practice given the high infrastructure costs incurred in servicing online sites. Online sites can only serve one traffic flow from dedicated slip roads and so two separate sites, one on each side of the road, will usually need to be constructed to serve the traffic on a dual carriageway. The higher costs of online sites include future operating and maintenance costs as well as construction costs.
- 6.8 Quite apart from the costs of constructing expensive new access infrastructure for online sites, it is often difficult to identify potential new sites between existing junctions given the need to maintain a minimum distance, usually of one kilometre, between them. This requirement arises due to the need to preserve a safe weaving distance between junctions to avoid traffic conflicts between vehicles entering and leaving the main road.
- 6.9 In contrast, junction sites have the advantage of using existing junction infrastructure and so avoid the cost of new slip road construction. Additionally, a single facility can

serve traffic travelling in both directions on a main road with one set of development and operating costs. Whilst the proportion of traffic turning in from the offside channel might be lower than for an online site, the advantage is that a single facility can serve traffic travelling in both directions on a main road. Given these factors and the high costs of developing service area facilities, there has been an increase in the development of junction sites in recent years. Where need is strong, a junction may support more than one facility, particularly where an existing facility is not capable of meeting the needs of all road users.

- 6.10 In my experience, roadside facilities are designed to cater for the roadside market of mainly transient traffic. Local customers do not make dedicated trips to visit such facilities but prefer to use local service stations and restaurant facilities. Some local traffic will however pass roadside facilities when travelling on longer journeys, but this process does not generate additional trips.
- 6.11 The motorist now requires a fast and efficient service. The operators' response is to ensure that a principal amenity building is provided that can efficiently cater for a range of needs. This building will have a number of payment tills allowing fuel and food to be purchased in a single transaction. Toilets, and where appropriate shower facilities, are also located within this control building. Some limited seating and tables are provided for those customers with the time to sit down for a meal. Where appropriate and to distribute customers across the site, increasing efficiency, separate restaurants will allow a pleasant and restful environment for the road user who wishes to sit down and eat and take a longer break. Some customers however, may only wish to take a short break, depending usually on where they are within their journey. For example, they may only need to purchase a coffee as refreshment on their journey. These customers may prefer to use a drive thru facility.
- 6.12 The provision of drive thru lanes has become widely accepted in the marketplace as an important part in responding to the varied needs of the customer. Whilst some customers will wish to sit down for their meal, others will prefer to use the drive thru. If such a facility is not provided, these customers might choose not to stop for refreshment, and perhaps to quickly use the toilet, but continue their journey. This might prejudice road safety.

- 6.13 Additionally, the benefit of drive thru facilities is to increase the overall capacity of the site to serve customers. Those customers who use a drive thru facility will tend to continue their journey more quickly and free up parking spaces for customers looking to stop and take a longer break. As matters currently stand, despite improvements in the time taken to charge EV vehicles, the dwell time on sites for these vehicles is greater than that for those powered by conventional fuel. The drive thru lane facilities, which will also be used by electric vehicles, assist in increasing the overall capacity of a service area site. As the numbers of electric vehicles increase, it is envisaged that EV charging provision will also increase. It is hoped that recharging times will reduce as technologies improve but it is difficult to be clear about the dynamic relationship between the number of vehicles and the number of recharging positions available. What is clear is that drive thru lanes will assist in allowing those drivers that only require a short visit to move through the site quickly and efficiently, thus increasing the residual capacity for those that wish for a longer stay.
- 6.14 Modern roadside facilities catering for all types of road user would include a range of EV charging points with associated parking, a conventional motorists' self-serve fuel forecourt with high-speed pumps under a canopy to protect against the elements, together with a separate canopied HGV forecourt with specialist high-speed diesel fuel dispensers and separate AdBlue dispensers.
- 6.15 Drivers of commercial vehicles are subject to a regime of statutory breaks and other working time restrictions. Service area facilities which are capable of offering effective parking, fuel and refreshment facilities for HGVs perform an important function in assisting compliance with these requirements which principally serve the objective of road safety.
- 6.16 Dedicated facilities for HGVs can be provided within separate truck stop, although it is seldom economic to provide a facility that solely serves the need of commercial drivers. To cater properly for HGVs and their drivers, roadside facilities need to incorporate a properly surfaced lorry park which is securely fenced with controlled gates to mitigate against the risks of crime which is prevalent in the sector. The facilities need to include hook-up points for vehicles carrying refrigerated loads and the lorry parking needs to be properly marked and lit to allow drivers to safely walk between

the parking areas and the amenity building. The costs of providing modern HGV parking capable of supporting the high loads of HGVs is high. The use of asphalt type products is inappropriate because of the wheel scrub that will occur when articulated vehicles turn at high speed. As a consequence, surfaces tend to be finished in expensive concrete, laid in reinforced sectional bays with mastic-filled expansion joints.

- 6.17 HGV drivers require opportunities to refuel their vehicles using dedicated high-speed refilling pumps and opportunities to purchase hot and cold food and drink and use shower and toilet facilities, which need to be provided for both male and female drivers. Although a rest room is sometimes provided, there is longer demand to support overnight sleeping accommodation given that drivers invariably choose to sleep in their cabs.
- 6.18 To properly cater for HGVs, the roadside facilities need to be conveniently accessible. Although HGV drivers will travel slightly further off their routes for specific overnight parking, the more conveniently facilities will tend to be located relatively close to the main road, so that the detour to refuel and park is relatively limited. Within the site itself, arrangements will tend to segregate the HGV internal movements from those of the motorist using an internal circulation route that minimises the risk of congestion.
- 6.19 Whilst issues relating to planning policy will be dealt with by others, it is recognised that the Service Area Site falls outside the settlement boundary. The purpose of the proposed facility is however, to directly address the needs of the passing motorist using the main road network and to prevent vehicles from detouring away from the main road in search of the essential facilities of toilets, fuel, refreshment and rest. As noted, such facilities can only be provided effectively if they are located close to the strategic road. The identified needs of road users would not be met by existing or proposed facilities that are remote from the main road and effectively concealed from the passing motorist.
- 6.20 Having set out the background policy and the principles of a modern service area facility, I will review the characteristics of the Service Area Site.

## **7.0 The Service Area Site – Location and Accessibility**

- 7.1 The general location of the Service Area Site is shown on Plan No 1 within Appendix 1. The Service Area Site is located just to the south of the intersection of the M180, A180, A15 and A18 known as Barnetby Interchange, Barnetby, being a grade separated roundabout junction. Leeds lies some 60 miles to the north-west, Doncaster some 35 miles to the west and Scunthorpe some 12 miles to the west via the M180 and other strategic routes. Hull lies some 16 miles to the north via the A15 and A63. Immingham lies some 8 miles to the north-east and Grimsby some 14 miles to the east via the A180. Newark lies some 45 miles to the south-west via the M180, A15 and A46 and Lincoln lies some 27 miles to the south via the M180 and A15.
- 7.2 Situated immediately to the south of Barnetby Interchange, the Service Area Site enjoys a principal frontage with the A18 northbound link road and secondary frontage with the A18 which are both two-way single carriageway roads. It is understood that the roundabout junction which forms the intersection of the A18 with the A18 link road immediately to the south-east of the Service Area Site was constructed relatively recently in early 2016.
- 7.3 At Barnetby Interchange the M180 to the west comprises a dual carriageway road providing three lanes of traffic in either direction which runs directly into the A180, which continues to the east and comprises a two-lane dual carriageway. The A15 to the north of the junction is also two-lane dual carriageway road. Lying to the south of the junction is a short section of two-way single carriageway road designated as the A18, which joins the east-west A18 route proper at a roundabout junction a small distance to the south of Barnetby Interchange. The Service Area Site conveniently fronts both the connecting stretch of the A18 and the western section of the A18.
- 7.4 As a consequence of the proximity of the Service Area Site to Barnetby Interchange and the roundabout junction of the A18 and A18 link road it is effectively able to serve all traffic flows in the vicinity. Consequently, this is an efficient arrangement which would allow all traffic movements on the interchange to be served. Although the new facilities would be partly obscured from the approaching motorist by the surrounding topography including the junction structure and landscaping, they would, if developed in accordance with the current plans, qualify for advance warning signs which would alert the motorist to their existence. Increasingly, systems within vehicles will direct road users to roadside facilities.

- 7.5 Eastbound M180 traffic can access the Service Area Site by leaving the M180 using the dedicated slip road, cross the carriageways using Barnetby Interchange, travel south on the A18 link road before using the roundabout junction to return north on the A18 link and enter the site via a direct left hand turn.
- 7.6 Westbound A180 traffic would be able to access the Service Area Site using the dedicated slip road, cross the M180 carriageways using Barnetby Interchange, travel south on the A18 link road before using the roundabout junction to return north on the A18 link and enter the facility via a direct left hand turn.
- 7.7 Southbound A15 traffic can access the Service Area Site by crossing the M180 carriageways using Barnetby Interchange, travel south on the A18 link road before using the roundabout junction to return north on the A18 link and enter the site via a direct left hand turn.
- 7.8 Traffic travelling east to west and vice versa on the A18 would be able to access the Service Area Site by making the appropriate manoeuvre at the roundabout junction and travelling north on the A18 link road before entering the facility via a direct left hand turn.
- 7.9 These conventional junction access arrangements would allow the Service Area Site to cater for the needs of all road users approaching both Barnetby Interchange and the roundabout junction of the A18 and A18 link road. Although the Service Area Site would not be highly prominent and visible to all approaching traffic, this is often the case in terms of modern roadside facility design, particularly where structural landscaping is required.
- 7.11 In conclusion the Service Area Site occupies a strategic location able to play an essential role in serving all categories of road user and particularly HGVs seeking high quality roadside facilities on the various approach routes to the important industrial sites of the Humber Ports and on the SRN and wider 'A' road network.

## **8.0 The Service Area Site Proposals**

- 8.1 The proposed development for the Service Area Site involves the construction of a high quality modern roadside facility to cater for all categories of passing traffic on a

site extending to some 6.47 hectares, which equates to some 15.99 acres or thereabouts. The regular shape of the plot allows for an efficient layout to accommodate a high-capacity facility and in particular the ability to lay out a good-sized HGV parking area. The Service Area Site is generally flat and level and limited re-grading would be required to develop it for this purpose.

- 8.2 The proposals, which at this stage are presented as a preliminary scheme which will inevitably be subject to refinement, are shown on Plan No 6 which appears as Appendix 7 to this report.
- 8.3 The facilities will include a modern self-serve fuel filling station and EV hub with separate dedicated HGV forecourt with an ancillary amenity building and two additional drive thru restaurant units, together with extensive parking areas for both cars and HGVs.
- 8.4 The proposals would include 6 dedicated EV recharging positions, conveniently located to allow customers to walk to the amenity building via a dedicated footway to take refreshments and visit the toilets whilst their vehicles are being recharged. The detailed layout would include an electricity substation to support this facility.
- 8.5 The proposed motorists' fuel forecourt, serving cars and LGVs, adopts a domino-six layout being provided with 6 pump islands in two rows under a de-linked canopy. The 6 dispensers allow for the simultaneous refuelling of 12 vehicles. The expanded layout allows good manoeuvrability on the forecourt to reduce congestion at peak times. After refuelling customers can move off onto the store front parking, with a total of 20 parking spaces including 4 disabled bays situated close to the amenity building entrance. This serves to further minimise the risk of congestion on the forecourt. Each refuelling position will provide all grades of fuel. Long hoses allow most vehicles to refuel in all positions improving overall efficiency. The forecourt would be served by a modern tank farm with four double walled, split compartment, underground storage tanks. This modern system would include a remote wet stock monitoring system. A further 32 parking spaces and 8 motorcycle cycle bays are provided to the south-east of the amenity building. 2 parking bays for caravans are also provided.
- 8.6 The canopied HGV forecourt provides 6 simultaneous refuelling positions served by three separate pump islands. Additionally, scope for AdBlue facilities would be incorporated. The forecourt has a high-capacity stacking area in the run on to the

pump islands to reduce congestion. The offset fills for the fuel tanker would be within this area, allowing it to exit in forward gears to comply with licensing requirements.

- 8.7 Both forecourts are to be served by a purpose-built single storey amenity building with a gross external area of approximately 832 m<sup>2</sup>. This single building would accommodate the catering facilities, toilets and motorist's shop. Access to the amenity building would be through doors set within the front elevation of the building. The size and shape of the proposed amenity building would allow the inclusion of a high quality, modern offer with a range of facilities designed to meet the needs of the passing motorist. Additional outdoor seating is provided on the patio area to the southern side of the amenity building, away from the main forecourts. A service layby is provided to the rear of the sales building for dry stock deliveries, together with a staff parking area comprising spaces for 18 vehicles.
- 8.8 The indicative layout also provides for two restaurant units situated at the eastern boundary of the plot and each is provided with a drive thru lane to increase the overall the efficiency of the site. The southern restaurant is the larger of the two having a gross external area of 375 square metres and provides 44 customer parking bays of which 12 and 2 dedicated disabled bays are located immediately adjoining the front elevation of the building. The smaller restaurant to the north has a gross external area of 215 square metres and provides 42 customer parking bays of which 7 and 2 dedicated disabled bays are located immediately adjoining the front elevation of the building. The proposals provide for extensive pedestrian footways and crossings to allow customers to safely walk between the drive thru restaurants, amenity building and their respective parking areas.
- 8.9 A considerable amount of design work has been carried out by specialist service area architects to manage and segregate cars and commercial traffic which allows safe operation and whilst maximising the flexibility of vehicle and pedestrian movements. A single entrance from the A18 gives access onto a two-way circulation road that leads firstly to the HGV refuelling and parking areas then to the motorists' forecourt, amenity building and drive thru restaurants. The securely fenced HGV parking area is located to the north of the plot and provides for 200 dedicated HGV parking bays, accessed by a pair of sliding security gates. An additional abnormal load bay is provided within the curtilage of the fenced HGV parking area. This main one-way circulation of HGVs means that private cars are not required to cross this flow. Having

refuelled, HGVs can exit the site by turning left out onto the service road, left onto a dedicated turning lane and right back onto the service road before exiting the site by a left turn onto the northbound carriageway of the A18. Alternatively, having refuelled, HGVs can park up by turning left out onto the service road to reach the entry security gate and the secure parking area beyond. Having parked for their desired period, HGVs can then egress the parking area via the exit security gate and a left turn out of the site onto the northbound carriageway of the A18.

- 8.10 Having entered the site using the single ingress on the A18 link road, motorists would then continue their journey through the site before either turning right to the motorists' forecourt and amenity building, continue south-east before turning left towards the drive thru restaurant and their associated parking areas or continue further south-east and turn right directly into the amenity building parking areas. Dedicated lanes and accesses are provided between each facility, allowing motorist customers to use the facilities in any order they might choose without negatively affecting the efficiency of the site. A motorist could for example, choose to continue past the main ingress to the motorists' forecourt in order to access the drive thru restaurant and parking areas but would then be able to turn left back on the main estate road before turning right towards the amenity building parking areas and right again to access the motorists' forecourt.
- 8.11 In total the facilities provide parking for 138 cars excluding the EV bays and 200 secure HGV parking bays.
- 8.12 The facilities would also provide 18 staff parking bays, 6 EV charging bays and 1 abnormal load bay, as well as 8 bays for motorcyclists and 2 bays for caravans.
- 8.13 A modern drainage system would be provided with containment for the areas under the canopies and tanker stand to drain through an interceptor. Although detailed design work is yet to be undertaken in relation to the provision of services and drainage, initial review suggests that these technical issues would be capable of resolution.
- 8.14 This preliminary layout would be subject to detailed design review but serves to confirm the capacity of the Service Area Site to accommodate a large-scale modern facility.

8.15 In conclusion, the facilities would provide a high-quality modern service area capable of efficiently serving all types of passing traffic and making a substantial contribution to meeting the needs of all motorists using this section of the trunk road network.

## **9.0 The Road Network and Current Traffic Flows**

9.1 The M180 and A180 provide a cross-country route which links the major north-south motorway routes of the M1 and A1(M) with Scunthorpe and the easterly ports of Immingham and Grimsby. This route also serves to provide a link for other key cross-country routes such as the A46/A15 between the M5 and M180, which is referred to by National Highways as the “Trans-Midland Trade Corridor” and to be of national significance. It also provides a further link to the east coast ports for traffic travelling south on the A15 from Hull and Howden via the A63 and Beverley and York via the A1079 and A164.

9.2 The A15 also provides an extended cross-country route from Peterborough in the south to Hull in the north via Bourne, Sleaford and Lincoln. Its importance has been reinforced relatively recently by the construction of the Lincoln Eastern Bypass to the east of Lincoln which carries the A15. This new 7.5 kilometre section opened in 2020. Just to the north of the new bypass, the A15 shares a carriageway with the A46 before continuing in a northerly direction towards Hull but linking in with both the A631 east-west route and also further to the north, the M180, A180 east-west corridor.

9.3 As noted, the Service Area Site is located immediately to the south of and adjoining Barnetby Interchange, a strategic roundabout junction where approaching traffic on the M180 from the west has two principal options. It may travel north onto the A15 towards the port and city of Hull or continue east on the M180 as the motorway transitions into the A180 toward the industrial and port locations of Immingham and Grimsby. Traffic approaching Barnetby Interchange from the west also has the option of turning right at the junction onto the short A18 link road towards the main line of the east-west A18 road. Road users using this route would typically be local traffic travelling to and from local settlements lying to the south of the M180 such as Brigg, Caistor, Kirmington and Laceby.

9.4 The traffic flows on the M180, A180 and A15 are commensurate with the strategic importance of this route and are high in absolute terms. This serves to demonstrate the

strategic importance of the interchange within the wider area. Plan 7 provided as Appendix 8 to this report gives details of the traffic flows in the immediate vicinity of the Service Area Site. Clearly traffic flows in 2020 and the first quarter of 2021 in particular were heavily adversely affected by the Covid-19 pandemic and are therefore not representative. I have therefore principally considered traffic flows in 2019, being the last full year preceding the pandemic, from which to assess the overall volumes of traffic passing the Service Area Site and likely to have a need for roadside facilities. The average annual two-way daily flow ("AADF") for the section of the M180 immediately prior to the Service Area Site to the west in 2019 was 38,340. A significant proportion of the total traffic flow at this location relates to HGVs and LGVs with a combined proportion of 52.2%. Overall traffic flows have been consistent at these levels since around 2012. I would note however that even in 2020, where levels of economic and social activity were severely adversely affected by the pandemic, traffic flows on the M180 remained high at 29,868 per day, relative to the pre-pandemic level previously given above. The average daily traffic flows during the pandemic were still therefore high in absolute terms, emphasizing the strategic importance of the M180 road, the route as a whole and the need for roadside facilities to serve drivers using this busy road.

- 9.5 Recently the traffic flow data for 2021 has been released. This indicates that traffic flows on the M180 have recovered significantly to those observed during 2020 Pre pandemic. Two-way daily traffic flows on the M180 at traffic count point reference number CP26061 to the west of the Service Area Site were 38,340 in 2019, reducing to 29,868 in 2020 but increasing to 33,970 in 2021. These figures suggest a strong recovery and provides further evidence that supports the strategic importance of the route.
- 9.6 The two-way AADF for the section of the A180 to the east of the Service Area Site in 2019 was 35,573. Again, a significant proportion of the total traffic flow at this location relates to HGVs and LGVs with a similarly high combined proportion of 43.7%. Again, reference to the 2021 data recently released provides further confirmation of the strategic importance of the route with a significant recovery in traffic flows so that the corresponding two-way traffic flow figure for 2021 was 34,093.
- 9.7 Looking in more detail at individual flows, the principal traffic flow from which trade would be drawn is the eastbound carriageway of the M180. Department for Transport manual traffic count point 26061 situated a short distance to the west of the Service

Area Site, confirmed that in 2019 the AADF on the eastbound carriageway of the M180 was 19,562 of which 4,651 or 23.8% were HGVs. The corresponding total for 2021 was 16,886 of which 4,685 or 27.8% were HGVs.

- 9.8 A further traffic flow of nearly equal importance in terms of trade is the nearside carriageway of the A180 westbound. Department for Transport traffic count point 17956 situated a short distance to the east of Barnetby Interchange on the A180, confirmed that in 2019 the AADF on the westbound carriageway of the A180 was 18,209 of which 5,011 or 27.5% were HGVs. The corresponding total for 2021 was 16,900 of which 4,810 or 28.5% were HGVs.
- 9.9 Details of the traffic flow approaching the Barnetby Interchange from the north on the A15 are shown within Department for Transport traffic count point 57942. The 2019 AADF at this count point approaching the junction on the southbound carriageway was 11,356 of which 1,081 or 8.1% were HGVs. The corresponding total for 2021 was 10,002 of which 954 or 9.5% were HGVs.
- 9.10 Details of the traffic flow approaching the roundabout junction from south on the A18 are shown within Department for Transport traffic count point 48482. The 2019 AADF at this count point approaching the junction on the northbound carriageway was 8,439 of which only 675 or 8% were HGVs. The corresponding total for 2021 was 7,085 of which 645 or 9.1% were HGVs.
- 9.11 This review of traffic approaching Barnetby Interchange is required to avoid double-counting. The total daily volume of traffic approaching the roundabout junction in 2019 was 57,566 vehicles of which 11,418 or 19.8% were HGVs. When the latest 2021 data is used for the same count of traffic approaching the junction the figure becomes 50,873 of which 11,094 or 21.8% were HGVs. This is a substantial volume of traffic commensurate with the strategic nature of the route.
- 9.12 In road safety terms it is more stressful to drive on busy congested roads than on those roads where traffic flows are lower. Consequently, there is a greater need for service facilities on such roads.
- 9.13 I will now review the existing facilities on the SRN and 'A' road network to consider whether there is a deficiency in the provision of roadside facilities.

## **10.0 Existing Roadside Facilities**

- 10.1 Plan Number 3 in Appendix 3 provides details of the location of the Service Area Site and the primary roadside facilities located on this section of the strategic road network. The primary roadside facilities are those larger higher quality sites which seek to cater for all categories of road user, providing comprehensive facilities and significant parking for all types of vehicles. These sites qualify for advance warning signs on the SRN or on 'A' roads and make a significant contribution towards satisfying the needs of road users. Each site is provided with a numbered designation e.g., R1 on Plan Number 3. Additionally, given the importance of HGV facilities, separate truckstop locations providing comprehensive facilities for commercial drivers have been identified on this plan.
- 10.2 Secondary facilities that may make some contribution towards satisfying need on this section of the strategic road network are show on Plan Number 4 within Appendix 4. These facilities have generally been classified as secondary because of some deficiency such as limited physical capacity, limited facilities or poor access or accessibility arrangements. Each site is provided with a numbered designation e.g., G1 on Plan Number 4.
- 10.3 It is helpful to consider the various routes taken by traffic approaching the Service Area Site. In practice there are a number of principal routes passing the Service Area Site which would be used by transient traffic and commercial drivers due to the proximity of the site in relation to major east coast locations, being the ports of Immingham, Grimsby and Hull as well as the city of Hull and the surrounding settlements.
- 10.4 These principal routes comprise firstly the route taken by traffic travelling on the M1 northbound from the south before proceeding on the M18, M180 and A180 towards Grimsby and Immingham or using the M18, M180 and A15 towards Hull and beyond.
- 10.5 Secondly, vehicles travelling on the M62 east of Leeds before proceeding on the M18, M180 and A180 towards Scunthorpe, Immingham and Grimsby.
- 10.6 Thirdly, vehicles travelling north on the A1 from Peterborough and the south before proceeding on the M18 and east via the M180 to Scunthorpe or via the M180 and A180 towards and Immingham and Grimsby or north on the A15 towards Hull and beyond.

- 10.7 A fourth key route is taken by vehicles travelling north-east on the A46 from Leicester before proceeding on the A15 at Lincoln and joining the M180 to reach Scunthorpe to the north-west or heading onto the A180 towards Immingham and Grimsby and onto the A15 and driving north towards Hull and beyond.
- 10.8 Given that a significant number of road users will be starting their journeys at these major settlements and ports, the reverse of each route will also be considered.
- 10.9 Additionally, I will comment on the more minor routes potentially served by the Service Area Site. Firstly, the route used by vehicles travelling north on the A15 from Peterborough and Lincoln before proceeding on the M180 and M180 towards Immingham and Grimsby or the A15, M180 and A15 towards Hull.
- 10.10 Secondly, vehicles travelling north on the A1 from Grantham and the south before turning north-east on the A46 at Newark before proceeding on the A15 at Lincoln, M180 and A180 towards Immingham and Grimsby or the A15, M180 and A15 towards Hull.
- 10.11 Thirdly, vehicles travelling south on the A1(M) from Middlesborough and the north towards Immingham and Grimsby via the M62, M18, M180 and A180 or via the M62, M18, M180, A15 and A63 towards Hull.
- 10.12 Fourthly, vehicles travelling south on the A1 from Worksop and Sheffield before proceeding on the A57, A15 at Lincoln and A180 towards Immingham and Grimsby or the A15, M180 and A15 towards Hull.
- 10.13 Fifthly, vehicles travelling from York and the surrounding areas before proceeding on the A1079 towards Beverley, the A164, A15 and A180 towards Immingham and Grimsby.
- 10.14 Finally, vehicles travelling south on the A19 from York and Selby via the A1041, M62, M18, M180 and A180 towards Immingham and Grimsby.
- 10.15 Whilst there are additional routes travelling motorists and commercial drivers may wish to take using other combinations of 'A' roads and motorways across this vast stretch of the SRN, I have not considered that these are sufficiently significant to require separate analysis at this stage.
- 10.16 Details of these various routes are set out in Appendix 5.

## **11.0 Gaps in Provision – Summary**

- 11.1 Whilst the review of existing facilities set out in Appendix 5 has identified that there are a number of smaller traditional sites on this part of the road network it is evident that there are limited locations that provide modern high-quality roadside services capable of meeting the requirement of all categories of road user to the standard contemplated by the Circular. In particular, facilities capable of serving HGV drivers and EV drivers are limited. The need to make particular provision for these road users has been recognised in the consultation exercise recently undertaken by National Highways and it is envisaged that emerging policy will place greater emphasis on the need for such facilities.
- 11.2 Having completed a review of the existing facilities on the various principal route on this stretch of the SRN and 'A' Road network I would identify the following significant gaps in provision in terms of roadside facilities capable of meeting the needs of all categories of traffic. All of the routes considered can be completed in both directions.
- 11.3 The M1, M18, M180 and A180 Leicester and the south to Immingham route. The gap between Doncaster North Services and Refinery Filling Station and Ulceby Truck Stop is about 33 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the eastern section of this gap.
- 11.4 The M1, M18, M180 and A180 Leicester and the south to Grimsby route. The gap between Doncaster North Services and Grimsby town and port is about 41 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the eastern section of this gap.
- 11.5 The M1, M18, M180, A15 and A63 Leicester and the south to Hull route. The gap between Doncaster North Services and Hull city and port is about 45 miles. The gap on the reverse of this route is the same. The Service Area Site sits approximately centrally within this gap.
- 11.6 The A46, A15, M180 and A180 Leicester and the south to Immingham route. The gap between Thurcaston Services and Refinery Filling Station and Ulceby Truck Stop is about 84 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the northern section of this gap.

- 11.7 The A46, A15, M180 and A180 Leicester and the south to Grimsby Route. The gap between Thurcaston Services and Grimsby town and port is about 91 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the northern section of this gap.
- 11.8 The A46, A15, M180 and A63 Leicester and the south to Hull route. The gap between Thurcaston Services and Hull city and port is some 93 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the northern section of this gap.
- 11.9 The M62, M18, M180 and A180 Manchester, Liverpool, Leeds and the west to Immingham route. The gap between Doncaster North Services and Refinery Filling Station and Ulceby Truck Stop is about 33 miles. The gap on the reverse of this route is the same. The Service Area Site is located sits within the eastern section of this gap.
- 11.10 The M62, M18, M180 and A180 Manchester, Liverpool, Leeds and the west to Grimsby route. The gap between Doncaster North Services and Grimsby town and port is about 41 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the eastern section of this gap.
- 11.11 The A1, M18, M180 and A180 Peterborough and the south to Immingham route. The gap between Doncaster North Services and Refinery Filling Station and Ulceby Truck Stop is about 33 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the eastern section of this gap.
- 11.12 The A1, M18, M180 and A180 Peterborough and the south to Grimsby route. The gap between Doncaster North Services and Grimsby town and port is about 41 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the eastern section of this gap.
- 11.13 The A1, M18, M180, A15 and A63 Peterborough and the south to Hull route. The gap between Doncaster North Services and Hull city and port is about 45 miles. The gap on the reverse of this route is the same. The Service Area Site sits approximately centrally within this gap.
- 11.14 The A1, A46, A15 and A180 Grantham and the south to Immingham route. The gap between Balderton Services and Refinery Filling Station and Ulceby Truck Stop is

about 55 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the northern section of this gap.

- 11.15 The A1, A46, A15 and A180 Grantham and the south to Grimsby route. The gap between Balderton Services and Grimsby town and port is about 61 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the northern section of this gap.
- 11.16 The A1, A46, A15, M180, A15 and A63 Grantham and the south to Hull route. The gap between Balderton Services and Hull city and port is about 65 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the northern section of this gap.
- 11.17 The A15, M180 and A180 Peterborough and the south to Immingham route. The gap between Peterborough Services and Refinery Filling Station and Ulceby Truck Stop is about 92 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the northern section of this gap.
- 11.18 The A15, M180 and A180 Peterborough and the south to Grimsby route. The gap between Peterborough Services and Grimsby town and port is about 105 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the northern section of this gap.
- 11.19 The A15, M180, A15 and A63 Peterborough and the south to Hull route. The gap between Peterborough Services and Hull city and port is about 109 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the northern section of this gap.
- 11.20 The A1(M), M62, M18, M180 and A180 Middlesbrough and the north to Immingham route. The gap between Doncaster North Services and Refinery Filling Station and Ulceby Truck Stop is about 33 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the eastern section of this gap.
- 11.21 The A1(M), M62, M18, M180 and A180 Middlesborough and the north to Grimsby route. The gap between Doncaster North Services and Grimsby town and port is about 41 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the eastern section of this gap.

- 11.22 The A1(M), M62, M18, M180, A15 and A63 Middlesborough and the north to Hull route. The gap between Doncaster North Services and Hull city and port is about 45 miles. The gap on the reverse of this route is the same. The Service Area Site sits approximately centrally within this gap.
- 11.23 The A1, A57, A15, M180 and A180 Worksop and surrounding areas to Immingham route. The gap between Markham Moor Interchange and Refinery Filling Station and Ulceby Truck Stop is about 52 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the north-eastern section of this gap.
- 11.24 The A1, A57, A15, M180 and A180 Worksop and surrounding areas to Grimsby route. The gap between Markham Moor Interchange and Grimsby town and port is about 59 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the north-eastern section of this gap.
- 11.25 The A1, A57, A15, M180, A15 and A63 Worksop and surrounding areas to Hull route. The gap between Markham Moor Interchange and Hull city and port is about 62 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the north-eastern section of this gap.
- 11.26 The A1079, A164, A15 and A180 York and the surrounding areas to Immingham route. The gap between York town and Refinery Filling Station and Ulceby Truck Stop is about 53 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the south-eastern section of this gap.
- 11.27 The A1079, A164, A15 and A180 York and the surrounding areas to Grimsby route. The gap between York town and Grimsby town and port is about 60 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the south-eastern section of this gap.
- 11.28 The A19, A1041, M62, M18, M180 and A180 York and the southerly surrounding areas to Immingham route. The gap between Doncaster North Services and Refinery Filling Station and Ulceby Truck Stop is about 33 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the eastern section of this gap.
- 11.29 The A19, A1041, M62, M18, M180 and A180 York and the southerly surrounding areas to Grimsby route. The gap between Doncaster North Services and Grimsby town and

port is about 41 miles. The gap on the reverse of this route is the same. The Service Area Site is located within the eastern section of this gap.

11.30 Overall, I conclude that there are many significant gaps in high quality, large scale service area provision on this part of the strategic road network.

## **12.0 Electric Vehicle Charging**

12.1 There is an increasing strategic need for the provision of electric charging facilities. The absence of provision adjacent to main routes is a major deterrent for motorists contemplating longer journeys using electric vehicles because of the real fear of running out of power and having to detour as a precaution or even being stranded.

12.2 As noted it is our understanding that the proposed property will, subject to viability, incorporate an element of electric charging. This facility would provide confidence to motorist of electric vehicles using all the transient routes we have identified. The location would be a focus and central and therefore conveniently located on these routes.

12.3 Existing electric charging provision for road users on the SRN and 'A' road network in the immediate area is solely provided Barnetby Service Station, with very limited supply available on further afield strategic routes. Even at MSA locations within the wider SRN where EV chargers are provided, the provision of such chargers can be limited leading to congestion and motorist frustration when the capacity is reached. The size, layout, remoteness of some of the other facilities near the Service Area Site on the routes reviewed will make retro fitting charging difficult and expensive. I consider there to be limited prospect of high-quality charging provision being made available on the strategic routes in the short to medium term.

12.4 Plan number 5 provided within Appendix 6 demonstrates the limited facilities for electric charging on the SRN and the 'A' road network. Reports compiled by Chargemaster suggest that should the registration of electric vehicles continue at the same rate there will be 1 million electric cars on UK roads by 2022 and 60% of all new cars would be electric by 2030. There will therefore be a significant strategic need to increase charging provisions in the short to medium term to meet rising demand. The

Service Area Site offers a significant opportunity to improve provision for the wider area.

- 12.5 The Service Area Site provides the opportunity to address the serious under provision in electric vehicles charging facilities on the routes at a convenient location.

### **13.0 HGV Facilities**

- 13.1 I have noted that following the release of the ministerial statement, greater emphasis is placed on the importance of providing facilities to meet the needs of HGV drivers using the SRN.

- 13.2 The final draft of the 2017 Study prepared by AECOM on behalf of Department for Transport during 2017 was released in January 2018. This document provides a regional analysis of the requirement for facilities for HGVs relative to existing provision. The Service Area Site is located in the Yorkshire and the Humber of the SRN. Table 5.52 within the 2017 Study, the survey confirms that the total requirement for overnight HGV parking in the East Midlands Region was 2,032 vehicles per day. In contrast, the existing capacity was 1,856. Consequently, the under provision in the region was spaces to accommodate 176 HGVs. It means that in effect, a significant number of vehicles within the region are being parking outside secure designated sites. Some of this parking takes place within industrial estates but the substantial majority occurs in laybys. The use of laybys for overnight parking is not considered safe. Laybys are not provided for this purpose.

- 13.3 Paragraph 4.2 in the 2017 Study states that the Humber Region is designated as 'Parking Shortage Hotspot Area'. These are defined as areas *"where stakeholders felt that the shortage of lorry parking facilities is the most pronounced. Generally, there was agreement that the level of provision is insufficient in terms of capacity and inconsistent in terms of standards and facilities."*

- 13.4 Another approach to considering the extent to which existing provision is likely to be inadequate the extent to which existing service areas are running at capacity in terms of overnight HGV provision. A schedule of those sites which are utilised to a level of greater than 85% is provided at Table 5.52 in the 2017 Study. This confirms that many of the sites within the region are fully used, to a 'critical level' as defined. In particular,

it is noted that Ferrybridge MSA was trading at 117% of capacity, Coneygarth Services was trading at 109% of capacity and Ulceby Truckstop was trading at 91% of capacity. These sites have been identified on Plan 3 within Appendix 3 as primary roadside facilities on the section of the SRN under consideration. The fact that they are all trading at capacity supports the view that existing HGV provision on this stretch of the stretch of the SRN is inadequate. Additionally, even though the HGV facilities at Caenby Corner Truckstop on the A15 to the south of the Service Area Site are of limited quality, the 2017 Study indicates that it is still achieving an 87% occupancy rate.

- 13.5 As noted at paragraph 4.37 of this report, the 2017 Study has been updated by the 2022 Study. This document does not comprehensively deal with the full range of issue addressed in the 2017 Study and presumably the reference to 'Part One' in its title suggests that a subsequent report may be issued to cover further matters. It can be stated however that Table 5-18 confirms that the total requirement for HGV parking in the Yorkshire and the Humber Region has decreased slightly from the figures previously quoted in the 2017 Study to 1,974 per day relative to existing on-site HGV parking capacity of 1,954. This suggests an excess in on-site capacity of some 20 vehicles.
- 13.6 It should be appreciated that no new HGV parking facilities have been brought forward in the intervening period between the two studies and therefore it follows that changes in HGV overnight parking demand have been affected by external economic factors such as Brexit, the Covid-19 Pandemic and global economic instability generally. It was noted in the Assessment of Lorry Parking Demand report ("the Lorry Parking Demand Report") prepared by SLR Consulting Limited on behalf of the Applicant, which is attached to this report as Appendix 11, that further development and freeport status designations within the Humber ports are expected to increase demand in the area. It is therefore reasonable to anticipate that the excess onsite HGV parking requirement will increase over time. Planning policy must therefore take into account the potential for this future growth.
- 13.7 It is further noted that in the 2017 Study the number of HGVs noted to have been parked in laybys was 356 and in industrial estates was 258. In the 2022 Study, the number of HGVs parked in laybys remained static at 354 and the number of HGVs noted to have been parking in industrial estates increased to 328. This shows a significant continued reliance on informal parking to accommodate HGV parking

requirements in the wider area. The HGV proposals at the Service Area Site would be well placed to reduce reliance on informal parking locations, thereby supporting National Highways' policy objective of meeting the safety and welfare of road users. This view is supported by the fact that the Department For Transport in the 2017 Study acknowledges that the quantum of HGVs parking in laybys and industrial estates is an indicator of unmet demand for formal HGV parking. Local authorities will find it difficult to take steps to regulate unauthorised parking unless there is sufficient parking for vehicles to use.

- 13.8 Table 5-19 in the 2022 Study also shows that the utilisation of on-site HGV parking across the region has decreased to an overall HGV parking space utilisation percentage of 66%. This decrease in utilisation may be caused by any number of factors including the specific demand over the period in which the study took place, increasing fuel costs or changes since 2017 in business practises at truckstops within the region. The variable nature of assessing HGV parking utilisation is emphasised by the findings of the Lorry Parking Demand Report which surveyed the four truckstop closest to the Service Area Site, being Scunthorpe Truckstop, Ulceby Truckstop, Immingham Lorry Park and Barney's Diner during June 2022. This report concluded that on inspection all four lorry parks forming part of the analysis were at or were approaching a critical level of utilisation, being greater than or equal to 85% for 12 hours or more per day and reached full capacity on at least one of the survey days. This indicates that, whilst overall utilisation figures for the region may have decreased slightly, demand for HGV parking in the area of the Service Area Site remained strong.
- 13.9 When considering utilisation rates within the context of the 2017 Study and the 2022 Study, it should be appreciated that this relates solely to overnight parking. It does not consider the provision of amenities and facilities for commercial drivers throughout the day. The Service Area Site would provide a comprehensive facility for HGV drivers.
- 13.10 My analysis of existing provision consistently concludes that facilities for HGVs on this part of the road network are not adequate. My findings are consistent with both the 2017 Study and the 2022 Study and confirm that the needs of commercial drivers are not currently met by existing provision. My findings are also consistent with the conclusions of the Lorry Parking Demand Report which found that 188 HGVs per day would benefit from the proposed facilities at the Service Area Site and therefore the

proposals for 200 HGV spaces would meet the required demand. The direction of policy is likely to be that greater weight should be given to increasing provision for these drivers. The review of stakeholder comments within the 2022 Study confirms that difficulty in obtaining planning permission for truckstop facilities is a key factor in explaining the existing under provision.

#### **14.0 The Service Area Site - Factors Affecting Service Area Potential**

14.1 Within this section I will consider the key criteria which service area operators will consider when evaluating a possible site and the extent to which the Service Area Site meets these criteria.

14.2 *Location and Access to Traffic* – A site should have access to a strong passing traffic flow in absolute terms. Ideally, this will include not only long-distance traffic but also commuter traffic and commercial traffic comprising HGVs and LGVs. These various types of traffic tend to reinforce the overall strength of the location. Due to the inter-relationship between the level of traffic and other factors to be considered when selecting a site for a service area, it is not possible to be categorical about the size of the traffic flow required. Petrol retailers would normally seek a flow of between 10,000 and 15,000 vehicles per day, depending upon levels of existing competition and composition of traffic flow.

14.3 The Service Area Site enjoys a strong location in service area terms having with access to a substantial traffic flow well in excess of the commercial minimum and with a high commercial traffic content. As noted, it would serve traffic approaching the roundabout junction in all directions. Many of the passing motorists are involved in longer journeys and will have a need for toilets, fuel and refreshments and rest close to the main road. HGV drivers will have an additional requirement for safe secure parking.

14.4 *Accessibility and Prominence* - The best service area sites are readily accessible and convenient. Motorists do not like to detour from their journey significantly for the purchase of fuel. Similarly, they will avoid sites that require access using roads in congested areas. Whilst sites which are visually prominent to approaching motorists

tend to be successful, increasingly roadside facilities tend to be offline and less visible. Motorists are however familiar with these arrangements and used to relying on advanced warning signs to alert them to the existence of approaching services.

- 14.5 The Service Area Site would be readily accessible to all approaching traffic at the roundabout junction and would have all the necessary facilities to allow it to qualify for advance warning signage to support its trading potential. I have noted that the access arrangements would require a minimal detour that would be acceptable in commercial terms.
- 14.6 Whilst the Service Area Site would be appropriately landscaped it would be visible to motorists on the roundabout to support safe access.
- 14.7 *Competition and stability of trading area* - High quality service area sites occupy a dominant location which is attractive and convenient to large numbers of customers and are relatively free from the competition from other modern high-quality roadside services. The site should be free from the risks of road schemes.
- 14.8 The Service Area Site would be located at a junction allowing to serve all flows with a single set of roadside facilities. It would occupy an effective and strategic location serving traffic on the M180, A180, A15 and A18 roads. This is an improved section of road and the risks of being affected by further road improvements is low.
- 14.9 As I have noted there is limited large scale high-quality service area provision on this part of the SRN and 'A' road network, particularly for HGVs. The Service Area Site would be well placed to meet this latent need.
- 14.10 *Site Size, Shape and Levels* - The service area site needs to be capable of conveniently incorporating all elements of a modern service station. The shape can vary but must allow an efficient layout to be constructed which is well related to the accesses. The layout must accommodate delivery vehicles including the fuel tanker and make provision for vehicles carrying abnormal loads.

- 14.11 The Service Area Site is readily able to incorporate a modern service area in terms of these factors. It is of sufficient size for this purpose and is regularly shaped and a scheme has been devised for it to be regraded.
- 14.12 *Services* - Service area sites need to be readily capable of being serviced. The requirement for electricity, often including a substation is increasingly significant given the power requirements for modern fuel infrastructure and sales building air conditioning and refrigeration. The need to provide substantial power to meet the requirements of EV charging has further increased the importance of being able to satisfy these power requirements at viable cost. Where significant reinforcement of the electricity supply network is required to provide sufficient power, substantial offsite works must be undertaken, including laying new cables and upgrading offsite infrastructure, including substations. Given that roadside facilities need to be generally located in rural areas adjoining the main roads they will serve, it can be the case that power networks in the immediate locality are inadequate. Consequently, this factor is of increasingly significant importance. Many potential locations that would historically have been developable as roadside facilities are no longer viable given the need to provide EV charging to meet this modern priority. Additionally, sites require mains water, telephone and IT connections for remote delivery and wet stock management. Specific consideration will generally need to be given to the proper disposal of surface water. Given the extensive areas of impermeable surfacing that is provided, it is usual to provide drainage attenuation. Some of this is often provided in granular material underneath parking areas but additional capacity is often required in the form of a balancing lagoon, to meet peak discharge run-off rate restrictions, which in the absence of a positive drainage connection or infiltration will usually go to a watercourse, requiring a discharge consent. Since the retailing of traditional fuels is a potentially contaminative use, modern leak detection systems and double-skinned underground fuel tanks with interstitial monitoring will be required, along with a modern Class 1 interceptor. Separate arrangements will need to be made for the disposal of foul drainage. Again, since roadside facilities are generally located in rural areas, a modern private system will generally be required to meet regulatory requirements.

- 14.13 Detailed design work will need to be undertaken to demonstrate the sites capability of being serviced but it is envisaged that technical solutions will be demonstrated.
- 14.14 *Extraordinary Costs* – Given the high costs of developing a modern service area it is essential that any extraordinary costs are identified, assessed, and reflected in the development appraisal. These costs relate to such matters as the abnormal costs in constructing accesses, managing adjoining land use and associated rights, stopping up highways and diverting existing services. Where these costs are excessive, a site can become unviable despite having a high traffic flow.
- 14.15 The Service Area Site is undeveloped land and although regrading and the construction of site accesses is required, no slip roads are required which will assist in containing development costs.
- 14.16 Having undertaken a review of the Service Area Site in relation to the relevant site selection criteria, I am satisfied that it would have the capacity once developed with the proposed scheme to meet the needs of road users on this section of the SRN and ‘A’ road network which are not currently addressed by existing road service area provision.

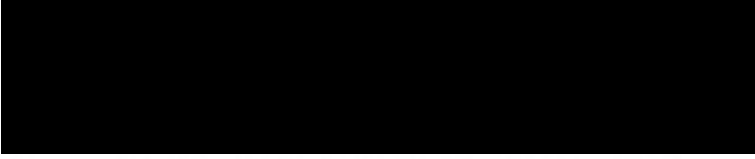
## **15.0 Marketing Report**

- 15.1 As I have noted, the bringing forward of a site by a significant operator in the industry provides evidence of un-serviced need.
- 15.2 A marketing statement prepared by Mr Alastair Coates of Alexander James Limited provides details of expressed interest in the site. This document is attached as Appendix 11 to this report.
- 15.3 This statement confirms that, following a targeted marketing campaign, a significant range of interest from high quality national operators has been received. The Applicant can therefore be confident that national operators have identified a strong need for roadside facilities at this location.

## **16.0 Conclusions**

- 16.1 I have identified very high traffic flows in absolute terms on this stretch of the SRN and 'A' road network.
- 16.2 I have noted that many of the existing roadside facilities on this stretch of the SRN and 'A' road network are historic and do not provide modern high-quality facilities to serve all categories of motorist.
- 16.3 In particular, I have noted that provision of service areas with proper provision for HGV drivers in terms of secure overnight parking and toilet and shower facilities is extremely limited.
- 16.4 I have identified a significant number of gaps in provision of high quality, large scale facilities on this part of the SRN and 'A' road network that exceed the 28 mile gap as defined in the policy set out in the Circular.
- 16.5 I have reviewed the location of the Service Area Site and consider that its location, close to the roundabout intersection of the M180, A180, A15 and A18 roads would allow it to effectively meet unsatisfied need for roadside facilities at a substantial number of routes from one new facility. The provision of such a facility would effectively serve the unsatisfied need in providing the essential amenities identified in the Circular and would in particular provide facilities for HGV drivers and electric vehicles, which have been identified in emerging policy as matters that require additional support to improve the UK's supply chain and decarbonise the transport sector.
- 16.6 I have not identified any superior location capable of satisfying the unaddressed need on the various routes I have identified.
- 16.7 I have noted that the range of facilities to be provided is comprehensive to meet the needs of road users in terms of welfare, refreshments, toilets and fuel as well as providing facilities for electric vehicles and HGVs. Additionally, and in particular, provision of secure overnight HGV parking with proper, associated, dedicated facilities, will contribute to meeting the needs of HGV drivers which are largely unsatisfied on this stretch of the SRN and 'A' road network. Furthermore, the site would provide urgently required recharging and refreshment facilities for electric vehicle drivers.

This concludes my report.



T D Hancock

21<sup>st</sup> December 2022