



Q. 49 – Should point 3 of the Policy refer to roads other than the M6 and A38(M)?

We support the policy as it is currently written within the submission document, and are concerned that applying it to the wider highway network in Birmingham could lose the required benefit of restricting adverts along the M6 in the interests of highway safety, especially if the policy were to be successfully challenged.

Department for Transport Circular 02/2013, The Strategic Road network and the Delivery of Sustainable Development, sets out our policy in regard to advertisements in Annex A: Special Types of Development. This policy in paragraph A2 states;

*‘The Highways Agency will not object to proposals for advertising consent for displays outside of the highway boundary of the strategic road network unless it has specific reason to consider that a hazard to road safety would be a direct consequence of the development. This would include advertisements that are located where particular attention should be given to the driving task, or where they unlawfully incorporate elements of traffic sign design, such as directional arrows. Advertisements within the highway boundary are not permitted. The Highways Agency will remove any unauthorised adverts placed within the highway boundary.’*

Whilst it is acknowledged that in general we will not object to advertisement consents outside the highway boundary, we have continually voiced our concerns regarding the impact that advertisements and advert totems have on the safe operation of the SRN at this location. We therefore consider that the M6 and A38(M) should be considered separately from the Local Highway Network. The justification for this position is set out below.

The section of the M6 between Junction 4 and Junction 8 is controlled by smart motorways and is in part elevated between Junction 5 and Junction 6. This section of motorway is the busiest across the Midlands region especially Junction 6 Gravelly Hill Interchange, locally known as Spaghetti Junction, where the M6 interchanges with the A38(M) and is the principle motorway

be upgraded further to ALR (All Lane Running) and therefore motorist concentration with minimal distraction is paramount to the safe operation of the SRN.

In addition, if a proposed advert is to be illuminated this presents an added complexity, especially at night where illuminated or digital adverts can cause glare on the motorway carriageway or can even be seen from a distance. Highways England have received several reports from concerned members of the public and our Traffic Officers that existing digital adverts on the M5 and M6 are particularly dazzling at night. In addition, the illumination of the advert could out-shine the digital screens on the gantries which set the speed limits or notifications of lane closures. This may result in motorists not observing important information about the operation of the SRN ahead and undermine its safe operation.

Finally, there are substantial differences between local roads and the Strategic Road Network, not least the higher speeds on the latter, as well as being an elevated section of motorway, which further increases the need for drivers to pay particular attention to the driving task. Therefore, we consider that the M6 should be kept separate to the local highway network when this policy is considered due to the circumstances set out above.

– *Should criteria a*

