

From: [Mike Birkin](#)
To: [M4 Junction 3-12 Smart Motorway](#)
Cc: [Jenny Bates](#); [Brenda Pollack](#)
Subject: attn: Richard Price - attendance at preliminary meeting
Date: 27 August 2015 16:54:27
Attachments: [FINAL Proposed principal issues IS hearings FoE CfBT Aug2015.docx](#)

Dear Mr Price

I am contacting you on behalf of Friends of the Earth to notify you of our intention to attend the preliminary meeting on 3rd September.

We will be represented by one or both of Ms Brenda Pollack and Ms Jenny Bates.

I am sorry I can't be exact at this time as some of my colleagues are on leave until next week.

We will wish to speak on these agenda items:

- 3 Initial assessment of principal issues
- 5 Draft timetable for the examination
 - Notifications relating to hearings
- 6 - Dates reserved for:
 - issue specific hearings on the impacts of the proposed development
 - open floor hearings

I attach in order to assist the panel an annotated version of the Examining Authority's initial assessment of principal issues with the additional points we would wish to see covered during the examination.

Yours sincerely

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Friends of the Earth and Campaign for Better Transport

27 August 2015

Proposed amendments to The Examining Authority's (ExA) initial assessment of principal issues, and requests for issue-specific hearings

All shown as tracked changes to the original list of principal issues from Annex B to the Rule 5 letter: <http://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010019/2.%20Post-Submission/Procedural%20Decisions/Rule%206%20Letter.pdf>

* indicates an issue on which we will argue for separate issue-specific hearings

1. Policy*

- i. Whether the proposal complies with the policy set out in the National Policy Statement for National Networks (NN NPS).
- ii. The extent to which the proposal would comply with the policies of Local Development Plans.
- iii. Whether or not that part of the application project which is located within the Green Belt would be inappropriate development and its effect on the openness of the Green Belt.

iv. Whether or not the scheme complies with other recent or emerging policy developments

A proposed new section of principal issues, and request for an issue-specific hearing:

1a. Scenarios and Modelling – traffic generation and assessment *

- i. Whether the traffic forecasts and analysis of the impact of the scheme are realistic and accurate - and the impact on the business case of all the different scenarios presented in the 2015 National Road Traffic Forecasts
- ii. The treatment of the potential expansion of Heathrow Airport in the modelling of the impact of the scheme
- iii. Whether the scheme is compatible with national, regional and local strategies to increase uptake and mode share for public transport, walking and cycling.

2 Environment* [and we wish to argue for separate issue-specific hearings on air quality, carbon emissions and noise *]

- i. The impact of the scheme on the character and appearance of the landscape, in particular the North Wessex Area of Outstanding Natural Beauty.
- ii. The visual impact of the scheme, in particular the effect of the proposed new gantries, lighting and new over and under bridges.

iii. Whether there would be any increase in the risk of flooding where the scheme is located in flood zones 2 and 3.

iv. In relation to nature conservation, the extent to which the scheme would cause disruption or permanent harm to habitats and plants, invertebrate species, amphibians, reptiles, birds, bats, water voles, otters, and badgers. In particular to what extent there would be an increase in mortality as a result of the introduction of a concrete barrier in the central reservation of the M4.

v. The extent to which the scheme would impact on air quality. In particular whether there are locations where EU limits for traffic pollutants would be exceeded as a result of the scheme, and where air pollution would be made worse in areas already over the limits.

vi. The extent to which the scheme would result in increases in levels of noise and vibration for sensitive receptors, and whether existing noise barriers provide adequate mitigation.

vii. The effect of the scheme on heritage assets.

viii. The effect of the scheme, and potential alternatives, on carbon emissions including embodied carbon in engineering works

3 Engineering Alternatives and design*

i. Whether the proposal to develop the M4 Junctions 3 to 12 as a “Smart Motorway” would be the most appropriate measure to meet the need identified in NN NPS paras 2.1-2.11 for development of the national road network.

ii. The extent to which the design meets the requirements for good design identified in the NN NPS, and is acceptable to the new Design Panel for major roads.

iii. The extent to which engineering details and the design (including mitigation measures) has been agreed with the 11 local authorities through which the application project passes.

iv. Whether alternative options, including peak-time-only hard shoulder running, and the introduction of Smart Motorway technology with only emergency use of the hard shoulder have been adequately considered. And what the different costs and impacts of these alternatives would be.

4 Impact on road users* [and we are requesting a separate issue-specific hearing on safety]

i. Whether the introduction of all lane running (ALR), with or without managed motorway techniques would reduce the safety of traffic using the motorway, and whether it is the safest option available that meets the objectives of the scheme.

ii. Whether the introduction of emergency refuge areas at 2.5 km intervals would secure the safety of users of the motorway in the event of breakdown or other emergency.

iii. Whether the scheme would increase flows on roads in the surrounding area to the detriment of road safety and congestion.

iv. Whether the scheme would impact upon the safety or convenience of non-motorised forms of travel.

5 Land acquisition

- i. Whether or not all the land or rights proposed to be temporarily or permanently acquired complies with the conditions set out in sections 122(2) and 122(3) of the PA2008.
- ii. The extent to which land which is currently in allotment use would be acquired on a temporary or permanent basis, and whether adequate alternative provision can be made.
- iii. The extent to which common land would be acquired on a temporary or permanent basis, and whether adequate alternative provision can be made.
- iv. The extent to which any public open space would be acquired on a temporary or permanent basis, and whether adequate alternative provision can be made.

6 Socio-economic

- i. The extent to which the scheme would result in any socio-economic benefits or disbenefits in terms of the national or local economy.

7 Other matters arising from representations