



Proposed M4 Junctions 3 to 12 Smart Motorway

Written representation to the Examination by Royal
Mail Group Ltd (Deadline 1)

PINS IP registration 10031613

2 October 2015

Introduction

As a statutory consultee and registered Interested Party, Royal Mail Group Ltd (Royal Mail) wishes to register an objection to the Development Consent Order (DCO) application by Highways England for the proposed M4 Junctions 3 to 12 Smart Motorway.

Royal Mail briefly sets out its position below and requests that the Examination has due regard to the content of this written representation.

Royal Mail is concerned that its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations may be adversely affected during the construction of the proposed M4 Junctions 3 to 12 Smart Motorway.

Included in this brief document are:

- details of relevant Royal Mail operational information, and
- a summary of Royal Mail's current position on the proposal.

A report from Royal Mail's highway advisor (PFA Consulting) is attached in support of this written representation.

Operational information

Royal Mail is responsible for providing efficient mail sorting and delivery nationally. As the Universal Service Provider under the Postal Services Act 2011, Royal Mail has a statutory duty to deliver mail to every residential and business address in the country as well as collecting mail from all Post Offices and post boxes six days a week.

Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting

and delivery to the public is sensitive to changes in the capacity of the highway network.

Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.

In exercising its statutory duties, Royal Mail uses the M4 Motorway between Junctions 3 and 12 on a daily basis. The M4 Motorway is of strategic importance to Royal Mail's operations nationally. The M4 is heavily used by Royal Mail convey mails around its network, with hundreds of Royal Mail vehicles passing through on a normal day.

Royal Mail logistics operate 235 planned services along this section of the M4 each day (Monday – Friday) including 203 Heavy Goods Vehicles (17 tonne and above) and 32 3.5 tonne vehicles. In addition to this logistics traffic, Royal Mail vehicles use this section of the M4 for local distribution traffic passing between the Delivery Offices, generating circa 70 7.5 tonne vehicle movements daily. Further to this, Royal Mail operates numerous ad hoc services on this section of the M4. These vary in number with time, but as an indication of magnitude, between the 1st and 21st September 2015 Royal Mail operated a further 67 services between Junctions 3 and 12 of the M4 Motorway.

There are numerous Royal Mail operational facilities within close proximity to the affected section of the M4. However, all Royal Mail operational properties west of the M25 are considered to be at risk of disruption if delays were to occur on the M4 Motorway between Junctions 3 and 12.

Royal Mail also operates two significant network hubs, Princess Royal Distribution Centre (PRDC) at Park Royal and Heathrow Worldwide Distribution Centre (HWDC) at Langley. Both are accessed via the M4 corridor.

PRDC is a major hub providing rail connection to and from Scotland and the North of England operating 6 trains per day, it is also a major road to road transfer hub connecting the South Wales and the West mail centres to those in and around the London and the South East along with the rail traffic transfers.

HWDC is Royal Mail's international handling centre where by all foreign mails both import and export transit on a daily basis 24/7/365 days per year. This site operates with its own vehicle operating centre to maintain critical movements of international mails between Airlines and our Mail Centres into and out of the country.

Summary of Royal Mail's current position on the proposed M4 Junctions 3 to 12 Smart Motorway

Royal Mail supports the principle of the proposed M4 Junctions 3 to 12 Smart Motorway scheme, which is expected to be of benefit to all users of this road once complete. However, Royal Mail is concerned about the potential for disruption to its mail collection, transport and delivery during the estimated 57 month construction period. Any such disruption on the M4, or the surrounding highway network, could affect Royal Mail's future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations. Clearly, this presents a risk to Royal Mail's business.

Royal Mail has commissioned advice from its highway advisor (PFA Consulting) on the potential impact during construction of the M4 Junctions 3 to 12 Smart Motorway scheme on Royal Mail operations (see attached PFA Consulting summary report dated September 2015).

As will be noted, PFA Consulting conclude that due to the scale and duration of the works there will be the likelihood of significant detrimental impact on road users over nearly a five year period.

PFA Consulting has also commented that whilst Highways England has produced and provided extensive technical documentation and a consultation framework is

outlined, there is no indication of proposed consultation on traffic management proposals with major private road users of the M4, such as Royal Mail.

In line with the recommendations made by PFA Consulting, Royal Mail broadly supports the construction and implementation of the proposed 'Smart Motorway' scheme subject to Highways England's agreement on three key issues as follows:

1. Highways England should set out its framework for consultation with major private road users, specifically including Royal Mail;
2. That the individual length of active works should be kept as short as reasonably possible; and
3. The impact of traffic incidents in works sections should be fully considered by Highways England and a strategy agreed with stakeholders, including Royal Mail.

In relation to 1. above, Royal Mail requests that these consultations should cover traffic management proposals and ensure the provision of advance information on programmed construction activities to enable Royal Mail to instigate contingency measures, if required.

To conclude, until such a time as it can be shown that either Royal Mail operations will not be adversely affected by the construction of the M4 Junctions 3 to 12 Smart Motorway, or the construction impact on Royal Mail's operations can be fully mitigated through appropriate consultation and traffic management measures, then Royal Mail's objection will be maintained.

Royal Mail reserves the right to alter its position or make further representations in due course once the above highlighted issues have been addressed by Highways England and an opinion is provided by Royal Mail's consultants on whether the action taken satisfactorily addresses its above stated concerns.

Royal Mail requests that this brief representation is taken into account by the Examination in determining Highways England's DCO application.

Should any queries or information requests arise then please contact Holly Trotman of Royal Mail (holly.trotman@royalmail.com) in the first instance.



PROPOSED M4 JUNCTIONS 3 – 12 SMART MOTORWAY SCHEME

REVIEW OF POTENTIAL IMPACT OF CONSTRUCTION ON ROYAL MAIL OPERATIONS

1. Introduction

- 1.1. Highways England (formerly the Highways Agency) has submitted to the National Infrastructure Planning Unit (NIPU) of the Planning Inspectorate a Development Consent application for the implementation of a 'Smart Motorway' between Junction 3 (Hayes) and Junction 12 (Theale) of the M4 (the 'Scheme').
- 1.2. The M4 is the main strategic route between London, the west of England and South Wales. The section between junctions 3 and 12 regularly carries over 130,000 vehicles per day. During peak periods journey speeds are low and congestion occurs which will only increase in the future as traffic flows are forecast to increase to 160,000 vehicles per day by 2036.
- 1.3. In summary, the Smart Motorway Scheme will convert the hard shoulder to a permanent traffic lane with emergency refuge areas spaced no more than 2.5km. Traffic flow will be constantly monitored and variable message signing will inform drivers of lane controls and impose variable mandatory speed limits. The Scheme will also include the replacement of overbridges which are too narrow and extensions to underbridges, culverts and subways.
- 1.4. This Note provides a summary of the results of a review of key traffic and construction documents produced by Highways England (HE) and submitted as part of the application. The principal documents reviewed included:
 - Environmental Statement - Non-Technical Summary;
 - Environmental Statement Ch 4 – Scheme Description;
 - Environmental Statement – Appendix 4.2A Outline Construction Environmental Management Plan;
 - Environmental Statement – Appendix 04-2A Outline Construction Traffic Management Plan.(Note: all documents dated March 2015)
- 1.5. An outline of the Scheme is provided in the *Non-technical Summary* together with an environmental impact summary table.
- 1.6. PFA Consulting, highway and transport consultant, has undertaken the review on behalf of Royal Mail to identify whether the implementation of the proposed Scheme is likely to have a serious impact on the transport operations of Royal Mail.

2. Construction and Traffic Management Information

- 2.1. The overall Scheme length is 51km (32miles) and it is anticipated that the works will progress from west to east.
- 2.2. Construction is programmed to commence in September 2016 and should be completed by May 2021 (a total of 57 months). The table below indicates the construction periods for each of the main phases of the scheme.

Table 3.1 - Proposed Construction Programme

Phase	Start	Completion
Phase 1a: Junction 12 to 8/9	Sept 2016	May 2018
Phase 1b: Structures Junctions 8/9 to 4b	June 2017	Sept 2019
Phase 2: Junctions 4b to 3 and completion of the carriageway Junctions 8/9 to 4b	Nov 2018	May 2021

- 2.3. An *Outline Construction Traffic Management Plan* has been submitted as part of the application but it is stated that:

“The actual traffic management design and proposals will be determined by the Contractor once appointed and reflected in a final version of this document. The description of traffic management which follows provides a framework for the methodology for the works which will enable the final management measures to evolve.

- 2.4. As the majority of the works will be on the existing hard shoulder the general aim will be to maintain the existing number of lanes along each section of the motorway by the introduction of narrow running lanes and a 50mph speed limit, enforced by average speed cameras.
- 2.5. There will also be a requirement for full carriageway closures and overnight closures restricting the number of running lanes to both implement traffic management measures and carry out specific construction works, such as bridge demolition, installing new bridge beams and gantries and duct crossings. In addition, there will be a need to temporarily close slip roads for similar works.
- 2.6. Due to the size and extent of the Scheme it is self-evident that closures and overnight working will be a frequent occurrence having a potential significant impact on RM operations.

3. Proposed Consultation

- 3.1. The *Outline Construction Environmental Management Plan* and *Outline Construction Traffic Management Plan* both contain consultation frameworks. Of key importance to RM are the proposed traffic management measures but although the *Outline Construction Traffic Management Plan* states that

“Detailed traffic management proposals and drawings will be produced and consultation will be held with external stakeholders” (Paragraph 2.4.1)

the list of stakeholders is limited to the emergency services, public transport operators and local authorities. Excluded from the list are private major road users such as Royal Mail.

4. PFA Consulting Comments

- 4.1. Due to the scale and length of time for the works, the proposed ‘Smart Motorway’ between Junctions 3 and 12 of the M4 motorway will inevitably cause congestion, delay and increased journey times for all road users. In particular, when incidents occur in the works, such as vehicle breakdowns or accident, the likely detrimental effects to traffic flow could be significantly worse than when such incidents occur at the present time as there will be no hard shoulder available and obviously no Smart Motorway control. However, once the Smart Motorway is completed the increased capacity should improve journey times and the reliability of journeys along this section of the M4.
- 4.2. The HE has produced and provided extensive technical documentation but although a consultation framework is outlined there is no indication of proposed consultation on traffic management proposals with major private road users of the M4, such as Royal Mail.

- 4.3. For major users of the M4 it will be critical that they are informed well in advance of significant traffic management measures and road closures to enable contingency measures to be programmed. For example, Royal Mail may wish to consider if alternative route options were available or hours of haulage may need to be altered.
- 4.4. It is also noted that the permanent outer lane widths will be reduced from the motorway standard lane width of 3.65m to the widths shown in the table below.

		Lane 1	Lane 2	Lane 3	Lane 4	Lane 5	
Four lane ALR	nearside	3.65m	3.50m	3.40m	3.20m	n/a	offside
Five lane ALR		3.65m	3.65m	3.50m	3.40m	3.20m	

Proposed Permanent Lane Widths (from Outline Construction Traffic Management Plan)

- 4.5. This will mean that HGVs and other large vehicles, which can travel in all lanes of a motorway except the outside lane, will be able to use lanes of 3.4m width compared to the standard 3.65m width and the outside lane will be reduced to 3.2m for cars and light vehicle use. Although these reduced lane widths are a 'Departure from Standard' the potential operational impacts appear not to have been considered by the Road Safety Audit Team as part of the Stage 2 Road Safety Audit.

5. Conclusions and Recommendations

Conclusions

- 5.1. The M4 between Junctions 3 and 12 frequently operates over capacity and with anticipated traffic growth this situation will only become worse leading to significant economic disbenefits.
- 5.2. When completed the Smart Motorway will increase capacity and should improve journey times and journey reliability.
- 5.3. However, due to the scale and duration of the works there will be the likelihood of significant detrimental impact on road users over nearly a five year period.
- 5.4. The impact of traffic incidents in the works areas is also likely to be more severe than existing due to the loss of the hard shoulder during construction.

Recommendations

- 5.5. It is PFA Consulting's opinion that Royal Mail should broadly support the construction and implementation of the proposed 'Smart Motorway' scheme subject to HE's agreement on some key issues as follows:
- The HE should set out its framework for consultation with major private road users, including Royal Mail;
 - Royal Mail should request that the individual length of active works be kept as short as possible; and
 - The impact of traffic incidents in works' sections should be fully considered and a strategy agreed with stakeholders.