

M4 Junction 3-12 Smart Motorway (TR 010019)

First written representation from Reading Friends of the Earth

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Responses to the Examining Authority's first written questions and requests for information – document 3401385.

Questions addressed: 1.2, 1.3, 1.5, 2.4, 4, 7.1

Question Reference 1.2

To what extent would the project deliver the objectives of NNNPS to increase the capacity and improve the performance of the Strategic Road Network?

The Summary of Need in Section 2 of NNNPS gives equal weight to four themes – one of which is the delivery of environmental goals.

A 'managed motorway' without ALR will increase capacity and improve performance. The costs and benefits of ALR should be assessed separately.

By investing in enabling/encouraging greater travel on the M4 by implementing ALR the project will increase motorway travel in the short term – making demand management and modal shift harder to achieve.

If traffic grows more than predicted congestion will continue to be a problem and air quality and climate-changing emissions will be even worse than predicted.

Priority should be to reclaim the M4 from local traffic for long-distance travel - by demand management and modal shift.

Question Reference 1.3

Would the project deliver appropriate environmental and social benefits as required by NNNPS para 3.3?

Is there any evidence that the project will mitigate its climate-changing emissions as required by NNNPS 3.3?

Question Reference 1.5

Does the Thames Valley Multi Modal Study (TVMMS) provide an adequate assessment of options to comply with the requirement in NNNPS para 4.27?

TVMMS does not present all lane running on the M4 as an option in its Table 4.1 – in our view it was right to reject major expansion of motorway capacity because of “The risks of accentuating the existing high levels of car dependency for trips through and within the Thames Valley by providing substantial new highway capacity within the study area” (TVMMS 4.3)

The options selection process for this application has been inadequate and arguably contravenes NNNPS para 4.27 – we are not aware there has been any serious consideration and modelling of a ‘managed motorway’ without all lane running, or of the approaches advocated by the TVMMS, namely (TVMMS Para 4.4)

- Modal shift and improved accessibility through **improved public transport**;
- **Managing the demand for travel** through LTPs, travel plan initiatives, and road user charging;
- **Improved management of road space** through design and information.

Question Reference 2.4

Is the scheme compatible with regional and local strategies to increase uptake and mode share for public transport, walking and cycling?

Increasing capacity on M4 will encourage car use and car ownership in the area which will directly work against increasing uptake and mode share for public transport, walking and cycling.

Question Reference 4

Environment

We are extremely concerned that there are no specific questions to explore the climate change impacts of the proposal.

The UK is committed to reduce emissions overall and increased emissions from transport will make this harder to achieve by increasing the burden on reductions in other sectors.

The emissions associated with the civil engineering aspects of the project should be quantified – they will have an ‘up front’ and irreversible impact.

Question Reference 7.1

Does the scheme comply with the need to be designed to minimise social and environmental impacts and improve quality of life in accordance with para 3.2 of the NNNPS?

The capacity to impose speed and lane controls – if it were aggressively used to reduce speeds and traffic volumes, and to create priority lanes for certain vehicle types – has the capacity to reduce noise, air quality, and climate change impacts – but there is no indication that it will be used in this way.

We can see no environmental or quality of life benefits from ALR.