

ROYAL MAIL

WRITTEN REPRESENTATION

HIGHWAYS ENGLAND'S RESPONSE

1. INTRODUCTION

- 1.1 *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.*
- 1.2 *Royal Mail briefly sets out its position below and requests that the Examination has due regard to the content of this written representation.*
- 1.3 *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.*
- 1.4 *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.*
- 1.5 *A report from Royal Mail's highway advisor (PFA Consulting) is attached in support of this written representation.*

2. OPERATIONAL INFORMATION

- 2.1 *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.*
- 2.2 *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.*
- 2.3 *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.

- 2.4 *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.*
- 2.5 *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.*

Highways England Comment

2.5.1 *Highways England acknowledges the above information.*

- 2.6 *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.*

Highways England Comment

2.6.1 *Highways England acknowledges the importance of the role that the M4 has in the Strategic Road Network, specifically linking England through to Wales, and Royal Mail's use of the M4, referenced above.*

2.6.2 *A response to the concern raised regarding disruption due to delays during the construction of the Scheme is provided below.*

- 2.7 *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.*

- 2.8 *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.*
- 2.9 *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.*

Highways England Comment

- 2.9.1 *Highways England acknowledges the above information.*

3. SUMMARY OF ROYAL MAIL'S CURRENT POSITION ON THE PROPOSED M4 JUNCTIONS 3 TO 12 SMART MOTORWAY

- 3.1 *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.*

Highways England Comment

- 3.1.1 *Highways England welcomes Royal Mail's support in principle for the Scheme.*
- 3.1.2 *Highways England understands Royal Mail's concerns over the potential for disruption to its services during construction of the Scheme. Paragraphs 8.3.1 to 8.3.6 of the Engineering and Design Report ("EDR") (Application Document Reference 7-3) describe the proposed traffic management regime and phasing of the works during the construction of the Scheme. Further information regarding the layout of the traffic management is provided in paragraph 7.13.4 of the EDR. Highways England confirms that three lanes, of narrow configuration will be kept open to traffic in each direction for the duration of the works during peak periods. A speed restriction of 50mph will be applied to allow use of the narrow lanes and to provide safe working zones for the workforce. As such, the M4 will*

remain open to traffic throughout the construction period except at limited times such as short term night time closures for the demolition and construction of bridges and gantries

- 3.1.3 *To provide an assessment of the effect of the proposed construction traffic management on users of the M4, the Highways England bespoke software program QUADRO (QUEues And Delays at ROADworks) was run. A technical note summarising the results of the tests is provided in Appendix 6.3 of the Environmental Statement (“ES”) (Application Document Reference 6-3).*
- 3.1.4 *Analysis of the results predicted by the program indicates that over the 24 hour day at no time during the first phase of works between junctions 12 and 8/9 does the total hourly traffic flow exceed the capacity of the three narrow lanes. Accordingly, the model does not indicate any excessive delay to traffic (journey times will be increased due to the imposition of a 50 mph speed limit).*
- 3.1.5 *During phase 2 of the works, between junctions 8/9 and 3, the capacity is only exceeded during the peak hours between junctions 3 and 4 and between junctions 5 and 6, leading to slower journey times through these sections. However, other than on Friday afternoons in the westbound direction, the forecast increase in journey times is less than 10 minutes (second paragraph on page 8 of the technical note (Appendix 6.3 of the ES)).*
- 3.1.6 *As a result, Highways England is of the view that there will be no significant disruption caused as a result of the construction of the Scheme. Royal Mail's ability to provide an efficient service will not be affected, such that there will be no risk to Royal Mail's business.*
- 3.2 *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).*
- 3.3 *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.*

Highways England Comment

3.3.1 *Highways England comments are provided in response to the PFA Consulting impact assessment report appended to this Written Representation. However, it is noted that, following the results of the QUADRO analysis reported above, Highways England does not accept that there will be a significant detrimental impact on road users over a five year period.*

3.4 *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.*

Highways England Comment

3.4.1 *Highways England comments in relation to the consultation process with major private road users have been provided below in response to paragraph 3.5.*

3.5 *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:*

(a) *Highways England should set out its framework for consultation with major private road users, specifically including Royal Mail;*

Highways England Comment

3.5.1 *An outline CTMP was submitted in support of the draft Development Consent Order (“DCO”) Application (Annex E to Appendix 4.2A of the ES (Application Document Reference 6-3)). The CTMP is secured under Requirement 18, Schedule 2 of the draft DCO (Application Document Reference 3-1). The CTMP is currently being developed by Highways England prior to approval of the final CTMP pursuant to Requirement 18. Highways England confirms that the final CTMP will set out Highways England’s commitment to inform key road users (including Royal Mail) of proposed traffic management proposals.*

(b) *That the individual length of active works should be kept as short as reasonably possible; and*

Highways England Comment

3.5.2 *Highways England recognise the importance of minimising disruption to the travelling public whilst improving and increasing the capacity of the strategic road network. As the detailed design and planning of the Scheme progresses, Highways England will ensure that the chosen solution provides the optimum solution in terms of length of traffic management, overall duration of the Scheme, cost, safety and ultimately the associated disruption to the road user, in line with Highways England's standard practices.*

3.5.3 *A number of options have been considered for the traffic management measures required for the construction of the permanent works and this is set out in section 2 of the CTMP:*

- *The full 52km of the Scheme under traffic management;*
- *Splitting the works into two phases (Phase 1 and Phase 2, as described below); and*
- *Phased working with 4km under traffic management with 10km gaps.*

3.5.4 *The second option of splitting the work into two phases (Phase 1 and 2) was chosen as the optimum solution taking all current factors into account, as outlined in paragraphs 8.3.1 to 8.3.6 of the EDR. Phase 1 is from junction 12 (Theale) to junction 8/9 (Holyport) a length of 27km, and the second phase is from junction 8/9 to junction 3 (Hayes) a length of 24km. It has been established from similar highway schemes that regularly implementing TM and then removing it with speed variance from 50mph to 70mph creates driver frustration and is less safe to the travelling public and road construction workers. TM arrangements of up to 32km (20 miles) have been found to be the maximum optimum distance to balance time, cost and safety. The philosophy behind the programme allows the work to be carried out in a safe and efficient manner with the minimum amount of disruption to the travelling public.*

(c) *The impact of traffic incidents in works sections should be fully considered by Highways England and a strategy agreed with stakeholders, including Royal Mail.*

Highways England Comment

3.5.5 *The impact of traffic incidents in the works sections has been and will continue to be considered by Highways England when implementing a traffic management strategy, as set out in the CTMP. When necessary during construction on the line of the trunk roads, the contractor will operate a vehicle recovery system to minimise the impact of breakdowns or accidents on the flow of traffic. A Closed Circuit Television (“CCTV”) system for identifying vehicles in need of recovery will be implemented during the works for monitoring traffic and other incidents. This will be a temporary system relaying pictures to a monitoring room staffed by suitably qualified staff 24 hours a day, 7 days per week including all bank holidays. There will also be a link from the monitoring room to Highways England’s Regional Control Centre (“RCC”) to enable the Traffic Officer Service to view images from the site monitoring room. The CCTV monitoring staff will despatch breakdown recovery vehicles and crews to ensure speedy removal of breakdowns. The contractor will monitor traffic management schemes, traffic levels on roads and site accesses and public roads adjacent to access points to maintain their effectiveness and condition throughout the works and to provide for the safety of traffic, the public and construction staff during traffic management works. The contractor will provide information regarding any delays to traffic due to construction works to Highways England.*

3.5.6 *Whilst the strategy to handle the impacts of traffic incidents in works sections will not be agreed formally with Royal Mail, the impacts on Royal Mail will be taken into consideration by the traffic management working group (which would include local councils, emergency services and highways authorities) and information will be provided to Royal Mail, as set out in the CTMP.*

3.6 *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.*

Highways England Comment

3.6.1 *Highways England will prepare a community engagement strategy for the construction stage of the Scheme (as secured by paragraph 4.3.9 of the outline Construction Environmental Management Plan (“CEMP”) (Appendix 4.2A to the ES (Application Document Reference 6-3)) and key business haulage companies*

such as Royal Mail will be included in the Communication Plan and will be kept informed of major traffic management proposals, including notification in advance of M4 night-time closures. The information on forthcoming road closures will also be advertised on the Highways England web-site. Section 4.1 of the outline CEMP secures the requirement for the preparation of a Communications Plan.

- 3.7 *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.*

Highways England Comment

- 3.7.1 *Highways England is of the view that its modelling has demonstrated that Royal Mail's operations will not be adversely affected by the construction of the Scheme, as explained at paragraphs 3.1.3 to 3.1.6 above. Further, as has been explained above, appropriate consultation with Royal Mail is proposed.*
- 3.7.2 *Highways England will continue to consult and work with Royal Mail to alleviate its concerns.*
- 3.8 *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.*
- 3.9 *Royal Mail requests that this brief representation is taken into account by the Examination in determining Highways England's DCO application.*
- 3.10 *Should any queries or information requests arise then please contact Holly Trotman of Royal Mail (holly.trotman@royalmail.com) in the first instance.*

APPENDIX TO ROYAL MAIL'S WRITTEN REPRESENTATION

REPORT OF PFA CONSULTING

HIGHWAYS ENGLAND'S RESPONSE

PROPOSED M4 JUNCTIONS 3 – 12 SMART MOTORWAY SCHEME

REVIEW OF POTENTIAL IMPACT OF CONSTRUCTION ON ROYAL MAIL OPERATIONS

4. INTRODUCTION

4.1 *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').*

4.2 *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.*

4.3 *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.*

4.4 *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)

4.5 *An outline of the Scheme is provided in the Non-technical Summary together with an environmental impact summary table.*

4.6 *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.*

5. CONSTRUCTION AND TRAFFIC MANAGEMENT INFORMATION 2.

5.1 *The overall Scheme length is 51km (32miles) and it is anticipated that the works will progress from west to east.*

5.2 *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.*

Highways England Comment

5.2.1 *The above is correct, as confirmed in the 'How the Scheme will be constructed' chapter of the ES Non-Technical Summary (Application Document Reference 6-4).*

5.3 *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"

Highways England Comment

5.3.1 *This is correct. The final CTMP will be developed and approved pursuant to Requirement 18 of the DCO, in consultation with the relevant local planning and*

highway authorities and other key stakeholders, such as Royal Mail, as confirmed in the response to Royal Mail's written representation.

- 5.4 *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.*
- 5.5 *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.*

Highways England Comment

- 5.5.1 *This is correct. Such closures will be kept to a minimum and will only occur where absolutely necessary for demolition and/or construction works where these works cannot be undertaken safely in the vicinity of traffic.*
- 5.6 *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.*

Highways England Comment

- 5.6.1 *The majority of the work to construct the Scheme will be carried out during normal daytime working hours; as detailed in Section 5.4 of the outline CEMP. However, as stated above, certain operations will have to be carried out at night during partial or full closures of the M4 motorway.*
- 5.6.2 *Where temporary road or carriageway closures are required to facilitate construction works, the Contractor will consult with, and comply with the requirements of Highways England, the relevant local authority and the police. The Contractor will be required to demonstrate to the relevant authorities that the construction work cannot be carried out safely without the road closure.*
- 5.6.3 *Agreement on diversion routes will also be required prior to works commencing. Detailed traffic management proposals and drawings will be produced and consultation will be held with external stakeholders including Thames Valley Police, the Metropolitan Police, Area 5 Connect Plus, Area 3 EM Highways, the*

Traffic Officer Service and the various local authorities affected by the works. Others to be consulted in the formation of traffic management proposals will be Fire and Rescue, Ambulance Services, public transport operators, Network Rail, and district and parish councils (the latter particularly when planning road closures and diversion routes). Key business haulage companies such as Royal Mail will be included on the Project Communication Plan and will be notified in advance of M4 night-time closures. The information on forthcoming road closures will also be advertised on the Highways England web-site.

6. PROPOSED CONSULTATION 3.

6.1 *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.

Highways England Comment

6.1.1 *As noted in Highways England's response to paragraph 3.5 above, whilst detailed traffic management proposals will not be agreed formally with Royal Mail, the impacts on Royal Mail will be taken into consideration by the traffic management working group (which would include local councils, emergency services and highways authorities) and information will be provided to Royal Mail, as set out in the CTMP.*

7. PFA CONSULTING COMMENTS

7.1 *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.

Highways England Comment

7.1.1 Highways England recognises the need to minimise disruption generally, and to Royal Mail and other delivery services that rely on the motorway network for their operations specifically. During construction, traffic management will be brought into operation that maintains three running lanes of reduced width together with a speed limit of 50mph. This arrangement will be maintained at all possible times during daytimes and peak flows. At night, when necessary, single lane running will occur. It is acknowledged that the imposition of a speed limit will increase journey times through the works at certain times of the day but, as explained in paragraphs 3.1.3 to 3.1.6 above, it is not accepted that the traffic management will inevitably lead to disruption and delay.

7.1.2 In the event of an incident, the closely monitored traffic management with reduced driving speeds will assist in mitigating the effects. An Incident Management Plan will be in place throughout the duration of the works, a copy of which forms Appendix 2 to the outline Traffic Management Plan, Annex E to the outline CEMP. With these measures in place, it is not envisaged that any incidents that do occur will give rise to significantly worse delays than at the present time.

7.2 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.

7.3 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.

Highways England Comment

7.3.1 As stated above in the response to paragraph 3.5, Highways England is updating the outline CTMP and confirms that the final CTMP will set out Highways England's commitment to inform key road users (including Royal Mail) of

proposed traffic management proposals. Key business haulage companies such as Royal Mail will be included on the Project Communication Plan. A communication strategy will be in place as part of that plan to ensure businesses and local communities will be kept informed of potential closures and overnight working. Regular liaison meetings will be held between our communications officer and representatives of the local businesses and communities to ensure all are kept informed of the potential impacts to the area (Section 4 of the outline CEMP). The information on forthcoming road closures will also be advertised on the Highways England web-site.

7.4 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.

7.5 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.

Highways England Comment

7.5.1 Royal Mail have correctly quoted the proposed lane widths for All Lane Running ("ALR"). These are less than those used on a standard dual 3 lane ("D3M") or 4 lane motorway ("D4M"). The requirements for minimum lane widths on an ALR scheme are given in Interim Advice Note ("IAN") 161 (Managed Motorways ALR) which gives dimensions for use when converting a three lane motorway with hard shoulder into a four lane ALR motorway.

7.5.2 However, the use of these lane widths is not a departure from standard. The lane widths used on the Scheme are in accordance with those given in IAN 161 (as detailed in HE Table 1 below) and therefore are not a departure from standard. This is with the exception of the section crossing the river Kennet where there is a deficiency in width of 160mm in the available bridge deck. The lanes across this bridge will therefore be reduced by approximately 40mm each, given that the alternative would be to provide a new wider structure (resulting in additional cost, time and environmental impact).

7.5.3 *As the remainder of the Scheme’s lane widths meet current design standards, the Road Safety Audit team would not have considered them an issue during the Stage 1 Road Safety Audit, as they are common across the ALR programme.*

Lane 1 (m)	Lane 2 (m)	Lane 3 (m)	Lane 4 (m)
3.65	3.50	3.40	3.20

HE Table 1 minimum dimensions for traffic lane widths detailed in IAN 161/13

7.5.4 *It should be noted that although, other than lane 1, the lane widths are narrower than on a normal motorway, similar lane widths have been used on other Smart motorway schemes across the network, including the Dynamic Hard Shoulder (“DHS”) schemes around Birmingham, some of which have now been in operation for 10 years. There have not been any concerns reported back from the road operators that these lane widths have caused an issue.*

8. CONCLUSIONS AND RECOMMENDATIONS CONCLUSIONS

8.1 *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.*

Highways England Comment

8.1.1 *Highways England agrees with this statement that future traffic growth will lead to economic disadvantages in the ‘Do-Nothing’ scenario.*

8.1.2 *Paragraphs 6.2.7 to 6.2.13 of the Socio-Economic Report (Application Document Reference 7-2) summarises the economic benefits that the Scheme is expected to deliver. This section describes a range of economic-related benefits from time savings for business users and improvements in accessibility to five regeneration areas that are in close proximity to the Scheme, concluding in paragraph 6.2.13 that “The Scheme may positively influence decision-making for businesses looking to locate to areas within the sub-region, as it makes a significant and strategic improvement to local infrastructure. The Scheme is thereby considered to have a moderate beneficial effect on the future economic growth of the sub-region.”*

- 8.1.3 *This is supported by paragraph 2.1 of the National Policy Statement for National Networks (“NN NPS”), which recognises that: “The national road and rail networks that connect our cities, regions and international gateways play a significant part in supporting economic growth, as well as existing economic activity and productivity and in facilitating passenger, business and leisure journeys across the country. Well-connected and high-performing networks with sufficient capacity are vital to meet the country’s long-term needs and support a prosperous economy.”*
- 8.2 *When completed the Smart Motorway will increase capacity and should improve journey times and journey reliability.*
- 8.3 *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.*

Highways England Comment

- 8.3.1 *It is not correct that works will have a significant detrimental impact on road users.*
- 8.3.2 *As stated in the response to paragraph 3.1 above, under the proposed traffic management regime, the predicted journey time extensions will be in the region of 10 minutes in peak periods (other than on the westbound carriageway on Friday afternoons when undertaking the works between J3 and 8/9).*
- 8.3.3 *This assessment has been made using the Highways England bespoke software program QUADRO, which Highways England apply to model traffic management delays on all Major Project schemes.*
- 8.4 *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.*

Highways England Comment

- 8.4.1 *A vehicle recovery system to minimise the impact of breakdowns or accidents on the flow of traffic will be operated during construction, as secured in paragraph 12.5.6 of the outline CEMP. A CCTV system for identifying vehicles in need of recovery will be implemented during the works and monitoring traffic and other incidents, as secured in paragraph 12.5.7 of the outline CEMP. This will be a*

temporary system relaying pictures to a monitoring room staffed by suitably qualified staff 24 hours a day, 7 days per week including all bank holidays. There will also be a link from the monitoring room to the Agency's Regional Control Centre to enable the Traffic Officer Service to view images from the site monitoring room. The CCTV monitoring staff will despatch breakdown recovery vehicles and crews to ensure speedy removal of breakdowns. In addition and, as stated at paragraph 7.1.2., An Incident Management Plan will be in place throughout the duration of the works, a copy of which forms Appendix 2 to the outline CTMP, Annex E to the CEMP. With these measures in place, it is not envisaged that any incidents that do occur will give rise to significantly worse delays than at the present time.

Recommendations

8.5 *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.*

Highways England Comment

8.5.1 *Highways England comments on the above points have been provided in the responses to paragraph 3.5 of the Written Representation.*