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WRITTEN REPRESENTATION

HIGHWAY ENGLAND'S RESPONSE

M4 SMART MOTORWAY WORKS – MYRKE ALLOTMENT TENANTS

1. ACCESS TO THE SITE DURING THE WORKS

1.1 *The Highways Agency have stated (9th Sept '15) that the contractor carrying out the works “will be required to maintain access to the Allotment site” apart from “a number of temporary short duration closures”. This is welcomed news but we need to confirm that the access will allow for heavy goods vehicles which sometimes need access to the site (for delivery of manure etc) and that the temporary closures would not prevent access to the site during the peak growing season other than overnight.*

Highways England Comment

1.1.1 Highways England confirms that access will be maintained to allow for heavy goods vehicles that may occasionally require access for deliveries. Highways England also confirms that temporary closures will be co-ordinated so as to avoid preventing access in the day time during peak growing season. These access arrangements will be included within the Construction Traffic Management Plan (“CTMP”) during the detailed construction planning stage following consultation with relevant stakeholders. An outline CTMP was provided as part of the application for a Development Consent Order (Annex E to the Construction Environmental Management Plan (Application Document Reference 6-3)). Approval and implementation of the CTMP is provided for at requirement 18 at Schedule 2 to the draft DCO.

2. PERMANENT FENCING

2.1 *We have a small section of noise fencing at the far end of the site. The Highways Agency have stated (9th Sept '15) that this will be replaced with low noise fencing but the majority of the M4 boundary will be safety fencing not low-noise fencing. We understand that new low-noise surfacing of the M4 will help reduce noise however our view is that with the hard shoulder (which directly borders plots) becoming a fast moving lane of traffic, tenants will suffer a significant increase in noise disturbance. For many tenants their allotment is a way of life*

and some spend many hours every day on their plot. We would ask that consideration be given to erect a taller noise reducing boundary. This would also potentially improve air quality on the site.

Highways England Comment

- 2.1.1 The locations and extents of existing noise barriers and the new noise barriers proposed as part of the Scheme are provided in Figure 12.2 of the Environmental Statement (“ES”) (Application Document Reference 6-2), a revised version of which was provided in response to Question E4.7.18 of the Examining Authority’s first written questions (at Appendix F to Section 4).
- 2.1.2 As the representation notes, there is an existing noise barrier in this location, which was installed primarily to provide noise mitigation to residential properties adjacent to the allotments. However, the noise barrier is also likely to provide noise mitigation to parts of the allotments themselves.
- 2.1.3 The noise and vibration assessment, as reported in Chapter 12 of the ES (Application Document Reference 6-1), takes into account the existence of this noise barrier. The magnitude of impact of noise during the operation of the Scheme is minor beneficial in the short term and negligible in the long term at this location (paragraph 12.10.16 in Chapter 12 of the ES). The significance of effect during the operation of the Scheme is assessed as slight beneficial in the short term and neutral in the long term at this location (paragraph 12.10.16 in Chapter 12 of the ES). These noise reductions are shown in Figure 12.4 for the short term, and in Figure 12.5 for the long term (Application Document Reference 6-2). Sheet 12 of Figure 12.4 and Figure 12.5 is relevant to the Myrke allotments area. As can be seen from these drawings, contrary to the suggestion in the representation that the operation of the Scheme will result in noise increases to the allotments, negligible noise reductions are predicted in the short term and in the long term and therefore, on this basis, additional noise mitigation in the form of an increased height noise barrier is not required to mitigate the effects of the Scheme.
- 2.1.4 Notwithstanding the above, there are a number of residential areas along the Scheme which are currently exposed to high noise levels, and will continue to be exposed to high noise levels with the Scheme in operation. It is noted in paragraph 12.4.112 of the ES that there is the potential to improve further the noise climate for these areas through enhanced mitigation.

- 2.1.5 A qualitative appraisal of an enhanced mitigation strategy to achieve this is provided in Appendix 12.5 of the ES (Application Document Reference 6-3). This enhanced mitigation strategy identifies the potential for provision of additional noise barriers, as outlined in Table A12.5.1 of Appendix 12.5 of the ES and the replacement of some existing noise barriers with higher/taller noise barriers as outlined in Table A12.5.2 of Appendix 12.5 of the ES. Further detailed assessment is required to confirm the requirement for enhanced mitigation. However, the existing noise barrier in this location mentioned by Ms. Darby is included in this enhanced mitigation strategy. Should the quantitative assessment confirm the appropriateness of enhanced mitigation in this location, the improvement to the noise climate (be it through additional barriers or taller barriers) will bring improvements to the allotments.
- 2.1.6 The effects of implementing this enhanced mitigation strategy have not been assessed in Chapter 12 of the ES. Hence, the assessment provided in Chapter 12 of the ES (which concludes that the vast majority of the Scheme corridor will experience noise reductions with the Scheme in operation) is very much a worst case, based upon the retention of the existing barrier rather than upon its replacement with a higher barrier, as is being proposed.
- 2.1.7 However, enhanced mitigation is not guaranteed. Work is on-going to provide a quantitative assessment of the enhanced mitigation strategy outlined in Appendix 12.5 of the ES. This comprises an iterative process which is employed to estimate the numbers of receptors experiencing specific reductions in noise levels (for an additional noise barrier, as detailed in Table A12.5.1 of Appendix 12.5 of the ES, or replacement of an existing barrier, as detailed in Table A12.5.2 of Appendix 12.5), monetising the benefits of these reductions in noise levels (as employed in Transport Analysis Guidance appraisal) and comparing this monetisation value with the cost of the mitigation to provide a cost benefit analysis, to ensure that the mitigation proposed as part of the Scheme is optimised. Hence, some of the additional noise barriers, and some of the replacement noise barriers, as outlined in Appendix 12.5 of the ES may not be taken forward as a result of this analysis. The results of that assessment, and the results of the assessment of the landscape and visual impact of any additional noise barriers proposed, will be provided to the Examination in due course. Where existing noise barriers are not replaced with

higher noise barriers, they will be retained or replaced like for like if in poor condition.

2.1.8 Finally, with regards to potentially improving the air quality on the site, the use of barriers is not currently an approved technique for mitigating air quality effects on Highways England road schemes. This is because there is some uncertainty over the effectiveness of this type of measure. As such, the erection of barriers to mitigate the effects of air quality is not a mitigation measure that is proposed. However, this is something that Highways England is currently investigating in a field trial as a potential future targeted mitigation measure.

2.1.9 In any event, Highways England do not predict that the Scheme will have any significant air quality impacts. As set out in paragraph 6.2.79 of the ES, where annual average concentrations are below $60 \mu\text{g}/\text{m}^3$, exceedances of the 1-hour air quality objective for nitrogen dioxide ("NO₂") are considered unlikely. The hourly mean is the applicable standard at an allotment. All air quality receptors within the study area are predicted to have an annual mean concentration of less than $60 \mu\text{g}/\text{m}^3$, with a maximum annual mean concentration of NO₂ adjacent to the M4, west of the M25 predicted to be $47.7 \mu\text{g}/\text{m}^3$ with the Scheme in place. This predicted concentration is well below $60 \mu\text{g}/\text{m}^3$, therefore, it is anticipated that exceedances of the 1-hour average objective are unlikely within the study area.

3. TEMPORARY ACQUISITION OF PLOTS

3.1 *The original plan indicated that a large section of the site (Plots 20 -33) would need to be temporarily acquired for Thames Water works to the main culvert. The Highways Agency (3rd June '15) said that they were looking at "alternative proposals to either reduce the extent of the works required or remove the need for the works entirely" and that a decision was expected mid-July '15. Given this, it was disappointing to have to wait until 25th September for an updated plan which does indicate a much smaller area will be acquired. (Revised plan attached, the redline indicates the original area identified for acquisition). This plan however has still not been formally agreed with Thames Water and does not confirm which plots will be acquired. The Highways Agency state (25th Sept '15) that "it appears to align with allotment plots 25 to 29 but I must stress that this should not be taken as definitive". Whilst we welcome this apparent reduction in the number of plots to be acquired the fact that it is not confirmed does extend the uncertainty of acquisition and put tenants of these and adjacent plots in a difficult position as to whether they should appeal or not.*

3.2 *Allotment tenants take great care in the management of their topsoil. Even temporary acquisition will destroy years of work. Due to the uncertainty, we have already seen a decline in cultivation standards of some plots in the area originally indicated. We need the Highways Agency to confirm which plots will be acquired as a matter of urgency to allow us to work with Slough Borough Council to minimise the impact on these tenants.*

Highways England Comment

3.2.1 Highways England has been engaging with Thames Water to determine the size of excavations, access arrangements and the working space required to undertake the works. This has led to a substantially reduced working area affecting fewer plots than first envisaged. Following a site survey on 28 October 2015, Highways England can confirm that only plot numbers 25, 26, 27, 28 and 29 will be affected by the works. Furthermore, Plots 25 and 29 which are located at the edges of the working area will only be partially affected during the works. A 3.5m wide strip of plot 25 and a 4m wide strip of plot 29 will remain available for use by the plot holders, as shown on Drawing TR010019-iii-01 in Appendix B to this response.

3.3 *We also requested that The Highways Agency investigate if it necessary to take over the full length of plots (28m). The Highways Agency (9th Sept '15) confirmed the full length of the plot will be used. Looking at the current plan we do not see why this is necessary. Allowing tenants to keep part of their plot might allow them to move and store structures and topsoil. We would ask that this is given further consideration.*

Highways England Comment

3.3.1 Thames Water has confirmed that the full length of each plot will be required, as shown on Drawing TR010019-iii-01 in Appendix B to this response, to undertake the works safely. This is in light of the space needed to accommodate plant, material and equipment storage areas, areas for pumping and disposal of ground water; access/egress for heavy plant/vehicles, turning of same vehicles and welfare facilities.

3.4 *The Highways Agency have stated (18th August '15) that "Thames Water have indicated that their preference is for the works to be accessed from the M4 rather than through the Allotment Site. We seek confirmation of this, any access through the site and/or use of the concrete road within the site boundary would have significant impact on all tenants.*

Highways England Comment

- 3.4.1 Highways England confirms that access for Thames Water to undertake the works will be from the M4 motorway and not through the allotment site or via the concrete road within the allotment site boundary. The access arrangements from the M4 will be included within the CTMP, details of which are provided above.