

CAA

WRITTEN REPRESENTATION

HIGHWAYS ENGLAND RESPONSE

Sir,

The CAA has no objections to the plans for the development of the M4 as indicated in your letter below. Noting that the CAA has no role in assessing the purely environmental implications of the project and therefore makes no comment on that specific aspect, I believe that the following (potential) issues are worthy of consideration:

1. AERODROME SAFEGUARDING.

1.1 *In respect of any potential aerodrome related issue, I should highlight the need for the developer or sponsor/ representative to check any safeguarding maps lodged with relevant planning authorities to identify any aerodrome specific safeguarding issues. Noting that aerodrome safeguarding responsibility rests in all cases with the relevant aerodrome operator / licensee, not the CAA, it is important that the related viewpoints of any relevant aerodrome license holders / operators is established and any concerns expressed appropriately mitigated; in this case this would be Heathrow Airport.*

Highways England Comment

1.1.1 Highways England and Heathrow Airport Holdings Ltd ("Heathrow Airport") have already established communication. Meetings have been held to provide updates on the M4 junctions 3 to 12 smart motorway (the "Scheme") proposals and timescales in relation to the Scheme and the Development Consent Order ("DCO") process.

1.1.2 Heathrow Airport safeguarding will embrace the scheme between junctions 3 to junction 7 and details are being provided by Heathrow Airport to inform an assessment by the contractor of the crane permit requirements for works within the safeguarding zone. This will ensure that the safeguarding of flightpaths is effective.

1.1.3 Any aerodrome specific protective measures identified will be incorporated within the Construction Environmental Management Plan ("CEMP"). An

Outline CEMP is provided as Appendix 4.2A of the Environmental Statement (Application Document Reference 6-3), which is secured by Requirement 8, Schedule 2 of the Draft DCO (Application Document Reference 3-1).

1.1.4 During the detailed construction planning stage of the works, and prior to the commencement of the main works, the viewpoints from the relevant aerodrome license holders and operators will be established and any concerns expressed will be appropriately considered within the planned construction methodology and the protective measures incorporated within the CEMP.

2. SAFEGUARDING OF COMMUNICATION AND NAVIGATION SYSTEMS.

2.1 *Aviation safeguarding responsibility extends beyond that associated with physical safeguarding and includes the safeguarding to ensure the integrity of communications and navigation systems. Whilst the CAA is involved in the technical design of arrival and departure procedures at CAA Licensed Aerodromes, the safeguarding of those published procedures remains the responsibility of the airport operator. If the operator has related concerns and requires a regulatory input, they will approach the Instrument Flight Procedures experts within CAA for guidance. Please ensure Heathrow Airport are consulted when any tall structures (cranes) are likely to be used during the construction phases.*

Highways England Comment

2.1.1 Highways England acknowledges the importance of aerodrome safeguarding, both in a physical and systems related sense (especially the integrity of communications and navigation systems), in order to protect the aerodrome from developments within their area.

2.1.2 As stated above in the response to paragraph 1.1, Highways England will establish the viewpoints and address concerns from Heathrow Airport during the detailed construction planning phase and prior to commencement of the main works. Following discussions with Heathrow Airport, the Scheme will adopt appropriate measures within the CEMP to address any relevant concerns expressed regarding both physical and systems related aerodrome safety.

2.1.3 Furthermore, Highways England confirms that Heathrow Airport will be consulted when any tall structures are likely to be used during the construction phases. A craneage strategy for the project will be developed in consultation with

the National Air Traffic Services, (“NATS”) prior to the commencement of the main works and will include any restrictions imposed by NATS. In addition to provision within the CEMP, a register will be kept on the Scheme, throughout the construction stage, clearly highlighting all CAA Licensed Aerodrome restrictions that need to be adhered to.

3. CRANE OPERATIONS.

- 3.1 *If the use of cranes on the site extend to 300ft or more consideration must be given to notification for civil aviation purposes. Temporary structures such as cranes can be notified through the means of a Notice to Airmen (NOTAM). To arrange an associated NOTAM, a developer should contact the CAA (Airspace Regulation) at ausops@caa.co.uk / 0207 453 6599. The developer should provide an accurate location (degrees, minutes and seconds) an accurate maximum height (including any crantage) and a completion date.*

Highways England Comment

- 3.1.1 Highways England notes the information required and the contact details to arrange a NOTAM. Accurate information will be provided to the CAA in the event that a NOTAM is to be arranged. This requirement has been incorporated into the revisions to the Outline CEMP as provided as Appendix 4.2A of the Environmental Statement (Application Document Reference 6-3).
- 3.2 *If the crane is to be in place for in excess of 90 days it should be considered a permanent structure and will also need to be notified as such to the DGC (contact details above).*

Highways England Comment

- 3.2.1 Highways England notes the requirement to notify the DGC should a crane be required for a period in excess of 90 days. This requirement has been incorporated into the revisions to the Outline CEMP as provided as Appendix 4.2A of the Environmental Statement (Application Document Reference 6-3)1).
- 3.3 *Additionally, any crane of a height of 60m or more will need to be equipped with aviation warning lighting in line CAA guidance concerning crane operations which is available at <http://www.caa.co.uk/docs/33/CAP%201096%20In%20Focus%20-%20Crane%20Ops.pdf>.*

Highways England Comment

3.3.1 It is anticipated that the majority of craneage used on the Scheme will be below a maximum height of 55 metres. If any cranes above 60m are required then they will be equipped with the necessary aviation warning lights in accordance with CAA guidance. This requirement has also been incorporated into the revisions to the Outline CEMP as provided as Appendix 4.2A of the Environmental Statement (Application Document Reference 6-3).

4. EMERGENCY SERVICES HELICOPTER ACTIVITY

4.1 *Due to the unique nature of associated operations in respect of operating altitudes and potentially unusual landing sites, it would be sensible to establish the related viewpoint of the local emergency services, including the police Air Support Units and Air Ambulance.*

Highways England Comment

4.1.1 Highways England is working closely with the emergency service providers. Lessons learned from the M25 All Lane Running schemes are being shared with the Scheme and it is intended that any best practice will be integrated into a Regional Operating Agreement (“ROA”), which is being developed with the Emergency Services and strategic partners applying to smart motorways on the M4 motorway between junctions 3 to 12. The ROA will cover the management of the partnership between the Emergency Services and Highways England, and will address specifically partnership working in relation to incident detection, incident verification, incident access and initial incident response. Regular meetings have been held with representatives from the emergency services throughout the Scheme design including the Police, Fire, and Ambulance services. The representatives from these services will liaise with other colleagues within their organisations including the Police Air Support Units and Air Ambulance. The comment is noted and will be raised by the Scheme stakeholder team at the next emergency services meeting.

4.2 *Please do not hesitate to contact me if you require further input or clarification of any point.*