

# LONDON BOROUGH OF HOUNSLOW

## LOCAL IMPACT REPORT

### HIGHWAYS ENGLAND'S RESPONSE

#### 1. INTRODUCTION

#### 2. SITE CONTEXT, CONSTRAINTS AND PROPOSAL

2.1 *The works proposed within the boundary of the London Borough of Hounslow are restricted to junction 3, located within Heston West ward adjacent to the north western boundary of the borough. The scheme involves the installation of an emergency refuge area, a new post mounted sign and single cantilever gantry sign.*

2.2 *The following planning restraints are associated with the site:*

(a) *It is in an area of groundwater vulnerability*

(b) *It is within an Archaeological Priority Area*

(c) *It is within land designated as Metropolitan Green Belt*

(d) *The Cranford Village Conservation Area adjoins the site to its south*

(e) *The Grade II Listed Buildings the Old Rectory and Cranford Park Bridge are located within the locality*

2.3 *The land immediately around the junction is primarily open space with no dwellings in the area. However there is a travellers' site located within 150 metres of the junction to its southeast and a nursery approximately 90 metres from its south east side.*

#### Highways England's Comment

2.3.1 The planning assessment for the Application within the Planning Statement (Application Document Reference 7.1 ) was undertaken with reference to the relevant plan policies contained within the London Borough of Hounslow Unitary Development Plan Adopted 2003 (Saved Policies 2007) ("UDP"). At the time of Application, the UDP formed the primary policy framework against which development proposals within the Borough were to be considered. Highways England has provided a response to each point (a) to (e) in paragraph 2.2 below within the context of the Adopted UDP:

- a) Highways England considered groundwater vulnerability for the whole Scheme in the context of water quality. There is no specific policy reference or designation within the UDP in relation to groundwater vulnerability. Criterion (B.9) within overarching Policy ENV-B.1.1 on New Development does however seek to avoid the pollution of groundwater or any increase in the levels of pollution in surface water run off as a result of new development. A cross reference is provided in this Policy to Policy ENV-P.1.3 in respect of Surface Water Run Off. This generic policy has not been regarded as a key policy consideration within the context of the Scheme and has therefore not been referred to within the Planning Statement (Application Document Reference 7.1). Table 15.20 within Chapter 15 of the Environmental Statement (Application Document Reference 6.1) identifies receptors likely to be affected by the Scheme during construction and operation between junctions 4 and 3 (corresponding to the Borough). This states that in relation to water quality, a CEMP will be prepared to document all construction phase mitigation measures and that once operational, congestion and the number of accidents are anticipated to be reduced, which will reduce the risk of pollution incidents as a result of road accidents in this area.
- b) Highways England note that the section of the M4 within the vicinity of Junction 3 lies within a designated Archaeological Area as shown on the Supporting Map to the UDP (under Policy Reference ENV-B3). In line with Paragraph 5.141 of NN NPS the Environmental Statement (Application Document Reference 6.1) notes, in Paragraph 7.16.5 of the Cultural Heritage Chapter, that the Secretary of State may add requirements to a development consent order in order to ensure that any archaeological mitigation that has been identified in relation to the Scheme is undertaken in accordance within an agreed timetable and to appropriate standards. The assessment undertaken within the Environmental Statement identified the archaeological mitigation required and it is secured by way of the Outline CEMP (Appendix 4.2) and requirements within the DCO. Requirement 8 in Schedule 2 of the Draft DCO relates to the provisions of the CEMP and Requirement 15 to Archaeological Remains.
- c) Reference is made within the Planning Statement (Application Document Reference 7.1) to Green Belt Policies ENV-N.1.1, ENV-N.1.2 and ENV-

N.1.4 as part of the planning assessment for the Borough. The assessment acknowledged the aspects of the Scheme within the designated Green Belt, whilst noting that the nature of the proposed development and its confinement largely within the boundaries of the existing carriageway represents an acceptable form of development within the Green Belt when assessed against relevant policy requirements.

- d) Cranford Conservation Area adjoins the boundary of the M4 corridor, immediately to the south of Junction 3. It was considered in the Application in paragraphs 7.13.6 to 7.13.18 of Chapter 7 of the ES (Application Document Reference 6.1). However, reference to the Proposals Map of the Local Plan (which formed the basis of the planning assessment) does not show the Cranford Conservation Area as a designated conservation area, although other designated conservation areas are shown. In the light of the above, reference to Policy ENV-B.2.1 within the UDP on 'The Designation of Conservation Areas and Boundary Review of Existing Area's is relevant in providing a list of designated Conservation Areas, including Cranford Village.

Policy ENV-B.2.2 provides the relevant policy consideration for development within or affecting Conservation Areas, as set-out below:

*The Council will preserve and enhance the character or appearance of existing (and proposed) conservation areas by ensuring that:*

- i. any development within or affecting a conservation area preserves or enhances the character and appearance of the conservation area, any development should respect the character of the existing architecture in scale, design and materials;*
- ii. there will be a presumption in favour of retaining any building in a conservation area, which makes a positive contribution to the character or appearance of the area. Where a building makes little contribution to the area, consent for demolition will not be given unless there are approved plans for redevelopment or re-use of the land.*
- iii. any development proposal takes account of the Council's specific conservation area guidelines*

- iv. *the Council will consider making Article 4 directions under the Town and Country Planning Development Order 1988, in those Conservation where such a direction is considered to be appropriate, subject to the availability of resources.*

In relation to criterion (i) in relation to the effect of development on the character and appearance of a conservation area, the assessments undertaken within the Environmental Statement (Document Reference 6.1) on the impacts of the proposed development on identified heritage assets, Cranford Conservation Area is shown in Table 7.3 as having a ‘*Slight Adverse*’ effect, concluding that ‘*no mitigation is considered necessary due to the limited visual intrusion of the new structures.*’

Accordingly, it is acknowledged that the Scheme will not result in the preservation or enhancement of the character and appearance of the Cranford Conservation Area, as referred to in criterion (i). Whilst the policy provides relevant guidance at a local level, the primacy afforded to NN NPS on development consent applications for national networks nationally significant infrastructure projects in England is set-out in Paragraph 4.2 of the policy guidance, which states that:

*‘Subject to the detailed policies and protections in this NPS, and the legal constraints set out in the Planning Act, there is a presumption in favour of granting development consent for national networks NSIPs that fall within the need for infrastructure established in this NPS. The statutory framework for deciding NSIP applications where there is a relevant designated NPS is set out in Section 104 of the Planning Act.’*

With particular reference to the historic environment, the NN NPS recognises, in Paragraph 5.123 that some heritage assets, including conservation areas have a level of significance that justifies their designation. In relation to the decision making process, NN NPS states in Paragraph 5.133 that, ‘*where the proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, the Secretary of State should refuse consent...*’

However, the findings of the assessments undertaken above, show that the impacts of the Scheme on heritage assets, including Cranford Conservation

Area will not result in significant or substantial harm and therefore the Scheme is considered to be in compliance with the NN NPS in relation to the historic environment.

Criterion (ii) is not considered relevant to Scheme as this relates to the retention of existing buildings, which will not be affected by the Scheme. In relation to criterion (iii), there are currently no published conservation guidelines of relevance to the Scheme, other than general conservation advice and character appraisals published for individual Conservation Areas, including Cranford Village. There are no Article 4 Directions within Cranford Conservation Area, as referred to under criterion (iv).

e) Both the Old Rectory and Cranford Park Bridge are considered within the Environmental Statement (Application Document Reference 6.1). The Old Rectory is shown on Sheet 16 of Figure 7.1 of the ES, but is not discussed further within the Statement as it lies outside the Zone of Visual Influence (ZVI) for the Scheme and through the assessments undertaken, shows no increases in noise level above 3dB or adverse impacts to air quality. Cranford Park Bridge is also shown on Sheet 16 of Figure 7.1 of the ES and is referred to as part of a group of listed buildings within the Cranford Park Conservation Area in paragraph 7.13.11 of the Statement in which the impacts of the Scheme are discussed.

2.3.2 In relation to the travellers' site and nursery in the vicinity of junction 3, the potential impacts of the Scheme on identified receptors within a defined study area has been fully addressed within the Environmental Statement. (Application Document Reference 6.1).

#### Planning History

2.4 *There is a long planning history for works to and around junction 3, though none is considered relevant to the current proposal and there are no approved schemes likely to impact on any works proposed. A comprehensive list of recent planning history may be found at [www.hounslow.gov.uk](http://www.hounslow.gov.uk)*

#### Highways England's Comment

2.4.1 This representation concurs with that set-out in the Planning History chapter of the Planning Statement (Application Document Reference 7.1) and the

Addendum to the Planning Statement (Appendix A to the Deadline II submission). Highways England agrees that there are no committed developments likely to be affect the Scheme.

### **3. POLICY FRAMEWORK**

*3.1 The determination of planning applications in the borough must be made in accordance with the development plan unless material considerations indicate otherwise. Local finance considerations must also be assessed.*

#### Highways England's Comment

3.1.1 The Application is not a planning application - it is an application for development consent under the Planning Act 2008. Section 104 of the Planning Act 2008 requires an application for development consent to be determined in accordance with the NN NPS.

3.1.2 The development plan and local finance considerations are important and relevant considerations for the Secretary of State, but are not determinative of an application for development consent. As set out in paragraph 5.173 of the NN NPS the extent to which a project conflicts with a proposal in a development plan is a matter of weight for the decision-maker.

#### The National Planning Policy Framework

*3.2 The National Planning Policy Framework (NPPF) came into force on 27 March 2012, and from April 2014 National Planning Practice Guidance (NPPG) in the form of an online guidance resource to support the NPPF came into effect. The Local Planning Authority (LPA) considers that, where pertinent, the NPPF and NPPG are material considerations and as such, will be taken into account in decision-making as appropriate.*

#### Highways England's Comment

3.2.1 The NPPF states at paragraph 3 that:

*This Framework does not contain specific policies for nationally significant infrastructure projects for which particular considerations apply. These are determined in accordance with the decision-making framework set out in the Planning Act 2008 and relevant national policy statements for major*

*infrastructure, as well as any other matters that are considered both important and relevant (which may include the National Planning Policy Framework).*

3.2.2 The NPPF (and NPPG) is to be taken into account by local planning authorities within England in the preparation of local plans and in their decision taking on planning applications. It does not provide policy guidance for NSIPs, which are determined by the framework provided by the Planning Act 2008, the NN NPS and any other important and relevant matters (which may include the NPPF).

3.2.3 Indeed, the NN NPS notes at paragraph 1.18 that:

The NPPF is also likely to be an important and relevant consideration in decisions on nationally significant infrastructure projects, but only to the extent relevant to that project.

#### *The Development Plan*

3.3 *The Development Plan for the Borough comprises the Council's Local Plan (adopted by the Council on 15 September 2015), the West London Waste Plan and the London Plan Consolidated with Alterations since 2011.*

3.4 *The Local Plan documents can be viewed on the Planning Policy pages of the Hounslow website.*

#### Highways England's Comment

3.4.1 As noted in the responses to paragraphs 3.1 and 3.2 above, the Development Plan is likely to be an important and relevant matter in the determination of the Application by the Secretary of State.

### **4. ISSUES ARISING**

4.1 *The Council considers the following issues need to be considered as part of the proposed works:*

(a) *Air Quality*

(b) *Noise*

(c) *Impact on the highways network*

- (d) *Impact on the visual amenity of the area*
- (e) *Impact on the amenities of local residents*
- (f) *Environmental Impact*
- (g) *Flooding and Water Management*
- (h) *Socio Economic and Community Matters*

#### Air Quality

4.2 *Hounslow Borough Council has a number of concerns relating to how Highways England have undertaken air quality assessment in the borough. The following issues have arisen:*

- (a) *The London Borough of Hounslow works to London Councils Air Quality and Planning Guidance (2007), but Highways England have used guidance from the Institute of Air Quality Management. It is the Councils view that the impact on air quality is not 'imperceptible', but lies in category Air Pollution Exposure Criteria, APEC-B, suggesting 'mitigation measures must be considered'. At this stage, no mitigation measures appear to have been proposed by Highways England.*
- (b) *Receptor X617 and other locations in the borough have been declared Air Quality Management Areas and therefore cannot afford further breaches in Air Quality Regulations.*
- (c) *Highways England's Air Quality Report states that a number of receptors in the borough will exhibit NO2 concentrations well above the limit value (40ug/m3). Additional traffic spillage onto local roads that may result from the scheme risks increased exposure. Therefore, NO2 concentration levels should be monitored post implementation, in order to determine true extent of increase in emissions on Hounslow roads along the M4/A4 corridor.*



- (d) *Highways England’s modelled NOx concentrations that are heavily under predicted when compared with the monitored NOx concentrations, and this can only be so if modelling parameters entered into modelling software so dictate. Whilst it’s possible to derive corrections from monitored/modelled values inaccuracies in the latter are quite apparent. There appear to be assumptions, such as proportion of Euro VI cars, proportion of HGVs etc, which impact on the outcome of modelling exercise, however, none seem to be detailed in any of the appendices but will be needed if Hounslow Council are to commission our own modelling, in the absence of any justifiable mitigation. Such information should be shared as Hounslow Council may need to commission further investigation through independent modelling work capable of determining magnitude and extent of real geographic impacts in areas affected.*
- (e) *The scheme is not ‘air quality neutral and therefore not compliant with the London Plan. Both on and off site mitigation measures should be proposed to demonstrate the proposal would be ‘air quality neutral’.*

4.3 *On this basis the scheme is considered to have an adverse impact on air quality in the borough, without mitigation measures proposed to offset harm caused.*

#### Highways England's Comment

4.3.1 The response set out here addresses each of the bullet points above in turn.

4.3.2 Regarding point (a):

4.3.2.1 The London Guidance referenced above was published in 2007, prior to the National Planning Policy Framework (“NPPF”) and associated National Planning Practice Guidance (“NPPG”). The London Councils web resources (<http://www.londoncouncils.gov.uk/our-key-themes/environment/air-quality/london-councils-air-quality-and-planning-guidance>, last updated on 12 March 2015) notes that the London Guidance pre-dates the above national planning documents and that further advice is available within these documents. However, the London Councils web resources do not refer to the National

Policy Statement for National Networks (2014) ("NN NPS") against which the Scheme is to be determined.

4.3.2.2 The London Guidance is therefore not considered appropriate for the assessment of the significance of air quality effects from highways schemes against the air quality policy tests of the NN NPS. The Borough states that the Institute of Air Quality Management ("IAQM") Guidance has been utilised in the evaluation of air quality significance. This is incorrect - appropriate guidance from Highways England, which has been specifically developed for highways schemes, has been used (Interim Advice Note 174/13 '*Updated advice for evaluating significant local air quality effects for users of DMRB Volume 11, Section 3, Part 1 Air Quality (HA207/07)*'). The selection of this guidance document for the evaluation of the significance of air quality effects is identified in paragraph 6.2.59 of the ES (Application Document Reference 6.1). This guidance is consistent with the air quality policy tests contained within the NN NPS. The alignment of this guidance with the NN NPS and the Scheme's compliance with the policy tests set out is explained in paragraphs 6.18.1 to 6.18.10 of the ES (Application Document Reference 6.1).

4.3.2.3 Further, the recommendation under APEC B states "*May not be sufficient air quality grounds for refusal, however appropriate mitigation must be considered e.g., Maximise distance from pollutant source, proven ventilation systems, parking considerations, winter gardens, internal layout considered and internal pollutant emissions minimised.*" The measures suggested all relate to the potential for redesigning the layout and design of proposed developments, as would be expected for a document which is primarily designed for developers in the consideration of the local planning regime for new residential and mixed use developments sites, rather than for nationally significant highways schemes..

4.3.3 Regarding point (b):

4.3.3.1 X617 is the receptor designation for Wallis House that was used within the Preliminary Environmental Information Report (issued November 2014). Receptor X617 was anticipated to experience a small worsening in air quality and to have annual mean concentrations of NO<sub>2</sub> that would be above the objective value in the Opening Year (2022).

4.3.3.2 Further air quality modelling of Wallis House, utilising up-to-date plans of the building was undertaken to inform the ES. However, the modelling point representing Wallis House (receptor X617) was not subject to further modelling as the up-to-date plans of the building showed that this section of Wallis House would not be sensitive to changes in air quality. This is because it was established that the location modelled previously is a commercial location which is not subject to consideration under the air quality objectives, as described in Department for Environment, Food and Rural Affairs (Defra) Guidance: Box 1.4: '*Objectives should generally not apply at:*

*Building facades of offices or other places of work where members of the public do not have regular access'* (Local Air Quality Management Technical Guidance, dated 2009).

4.3.3.3 Additional receptor points were modelled on areas of Wallis House that were assessed as potentially sensitive to changes in air quality (e.g. residential units). These additional receptor points are all predicted to experience imperceptible increases in annual mean NO<sub>2</sub> concentrations (0.4 µg/m<sup>3</sup> or less). This is described in paragraph 6.14.25 of the ES (Application Document Reference 6.1) and presented on Drawing 6.18 of the ES (Application Document Reference 6.2).

4.3.4 Regarding point (c):

4.3.4.1 Measurement data was utilised in the air quality assessment for the verification of model outputs. This means that there can be confidence in the assessment of NO<sub>2</sub> concentrations, which indicates that some locations within the London Borough of Hounslow will be above the air quality objective for NO<sub>2</sub> in the Opening Year (2022). This is described in paragraph 6.14.16 of the ES (Application Document Reference 6.1). The assessment of effects on air quality due to the Scheme considered the anticipated change in traffic flows on the surrounding road network in the Opening Year (comparing the Do Something to Do Minimum scenarios) and comparing these changes to the criteria set out in the Design Manual for Roads and Bridges Volume 11, Section 3, Part 1 Air Quality (HA207/07). This is the approach identified in paragraph 6.2.31 of the ES (Application Document Reference 6.1).

4.3.4.2 Within the London Borough of Hounslow, the M4 and some sections of the A4 were predicted to experience a change in traffic flows over these criteria, as shown on Drawing 6.0 of the ES (Application Document Reference 6.2). No other roads within the London Borough of Hounslow were predicted to experience a potentially significant change in traffic flows, and therefore receptors on these roads are not anticipated to experience a significant change in air quality. On that basis, spillage of traffic is not considered to be an air quality concern for the Scheme and it is noted that at paragraph 4.5 below, that: *"Though the Council acknowledge the wide ranging impact on the highways network along the M4 corridor we do not consider there to be any specific issues relevant to the borough"*.

4.3.4.3 Local authorities along the Scheme currently collect measurement data within their areas, both close to and away from the Scheme. Therefore, as the Scheme is not predicted to have a significant effect on air quality, additional site specific monitoring is not proposed at this stage to monitor potential Scheme air quality effects. However, Highways England has committed in the Statement of Common Ground with the London Borough of Hounslow to *'consider a provision for monitoring'*.

4.3.5 Regarding point (d):

4.3.5.1 The methodology for the assessment follows the Design Manual for Roads and Bridges Volume 11, Section 3, Part 1 Air Quality (HA207/07) and associated Interim Advice Notes. The Interim Advice Note most relevant to the concern raised is 170/12 v3 ('Updated air quality advice on the assessment of future NO<sub>x</sub> and NO<sub>2</sub> projections for users of DMRB Volume 11, Section 3, Part 1 Air Quality'). This is the approach as identified in paragraphs 6.2.57 and 6.2.58 of the ES (Application Document Reference 6.1).

4.3.5.2 The method set out in Interim Advice Note 170/12 v3 considers Defra's advice on long term trends related to roadside NO<sub>2</sub> concentrations, which suggests that there is a gap between current projected vehicle emission reductions and projections on the annual rate of improvements in ambient air quality as previously published in Defra's technical guidance and observed trends. The methodology, known as 'Gap Analysis', involves the completion of air quality modelling and verification, to correct modelled total NO<sub>2</sub> concentrations. Following verification of the modelled results, they are then adjusted to represent the observed long term trend ("LTT") profile described in Interim Advice Note 170/12 v3. These results are considered to present a realistic worst case scenario, as only a portion of the full anticipated improvements in air quality by Defra guidance are assumed to occur in the Gap Analysis results by 2022.

4.3.5.3 In relation to the specific requests by the Borough:

(a) Proportion of EURO VI cars – this is defined in the Defra emission rates (available on line <http://laqm.defra.gov.uk/review-and-assessment/tools/emissions-factors-toolkit.html>) ; and

(b) Proportion of HGVs – this is included within the traffic data predictions carried out for this assessment. Details of HGV numbers and total flow are contained in tables A14 to A21 of the Traffic Forecasting Report (Document 3, Appendix 1 of Deadline I).

4.3.6 Regarding point (e):

4.3.6.1 The Air Quality Neutral guidance (Air Quality Neutral Planning Support: GLA 80371, dated May 2013) is designed for the assessment of air quality effects of proposed developments within London. The document states in paragraph 2.9:

*“Major Transport Infrastructure*

*2.9 Major transport infrastructure development, such as that proposed by TfL, is assessed using the Transport Advisory Guidance*

*(TAG) methodology, which estimates changes to NOx and PM emissions, and then applies an economic valuation. It is therefore suggested that it would be inappropriate to apply the air quality neutral policy to these types of development.”*

- 4.3.6.2 A TAG assessment has been undertaken for the Scheme. It is therefore considered that the air quality neutral guidance is not applicable to highways schemes, such as Highways England road schemes. Details of the TAG appraisal are summarised in the Appraisal Summary Table contained in Appendix B of the Socio Economic Report (Application Document Reference 7.2).

#### Noise

- 4.4 *There may not appear to be any significant issues arising from impact of noise on residents within the borough, although residential properties that already suffer from significant and relatively high level of road traffic noise, will only exacerbate the existing adverse impact, by virtue of additional noise source moving even nearer.*

#### Highways England's Comment

- 4.4.1 Highways England does not agree with the Borough that noise levels will be exacerbated. The noise assessment for the Scheme presented in Chapter 12 of the ES (Application Document Reference 6.1) indicates that although there is some re-positioning of the traffic noise source onto the hard shoulder and closer to sensitive receptors, the mitigated Scheme will generally be beneficial to local residents.
- 4.4.2 The change in noise level to a receptor resulting from using the hard shoulder as a running lane is a function of several factors, which are incorporated into the noise model and explained in the Calculation of Road Traffic Noise (Department of Transport and Welsh Office, 1988):
- Factor 1: The distance from the motorway to the receptor;
  - Factor 2: The traffic source moving closer to the receptor;
  - Factor 3: The change in traffic flow, % HGV and speed resulting from the use of the hard shoulder;
  - Factor 4: The change in shielding provided by any existing noise barriers or ground forms;
  - Factor 5: The traffic on the far carriageway moving further away; and

Factor 6::The change in the road surface properties.

If factors 3), 4), 5) and 6) did not change between the Do Minimum and Do Something scenarios, the increase in noise level resulting from the use of the hard shoulder would be approximately as shown below:

Distance to receptor (m)	Increase in noise level (dB)
10	1.9
20	0.8
30	0.5

4.4.3 Thus, for distances of 20 metres and more, the increase is less than 1 dB, a negligible increase, as shown in Table 12.7 of the ES (Application Document Reference 6.1) for a short term change in noise levels.

4.4.4 In practice, factors 3), 4), 5) and 6) play a part in determining the generation and attenuation of noise over distance (particularly factor 6), where the provision of a low noise surface provides a 3.5 dB reduction over a standard hot rolled asphalt (“HRA”) surface. The effects of these combine to give the resultant change in noise level, which can be a decrease even though the traffic is moving slightly closer to receptors.

4.4.5 For the Scheme, the mitigation strategy (presented in Chapter 12 of the ES (Application Document Reference 6.1) and Appendix 12.2 of the ES (Application Document Reference 6.3)) comprises the provision of a low noise surface across all lanes of both carriageways (see paragraph 12.2.49 of the ES) (Application Document Reference 6.1) plus the provision of a small number of additional noise barriers. There are no existing noise barriers in the Hounslow area of the Scheme and none are required by the Scheme. However, new low noise surfacing is provided on the main line carriageway and slip roads west of junction 3 (as shown on Drawing 12.2 Sheet 16, Application Document Reference 6.2).

4.4.6 With this mitigation strategy, the forecast impacts of the Scheme within the London Borough of Hounslow are generally beneficial with negligible / minor noise reductions in the Opening Year (2022) and negligible noise reductions in the Design Year (2037). These noise reductions are evident in Drawing 12.4,

Sheet 16 (Application Document Reference 6.3) for the short term and in Drawing 12.5, Sheet 16 (Application Document Reference 6.3) for the long term.

- 4.4.7 It is noted that the signed Statement of Common Ground between Highways England and London Borough of Hounslow has been agreed and in accordance with paragraph 1.16, all items other than air quality during operation were agreed.

Impact on the Highways Network

- 4.5 *Though the Council acknowledge the wide ranging impact on the highways network along the M4 corridor we do not consider there to be any specific issues relevant to the borough.*

Highways England's Comment

- 4.5.1 Highways England notes the Borough's comment and does not propose to comment further.

Impact on the Visual Amenity of the Area

- 4.6 *Due to the limited scale of works proposed there do not appear to be any issues arising from potential impact on the character and appearance of the borough.*

Highways England's Comment

- 4.6.1 Highways England notes the Borough's comment and does not propose to comment further.

Impact on the Amenities of Local Residents

- 4.7 *Aside from the concerns outlined above the Council is of the view that there will not be any adverse impact to the amenities of residents in the borough.*

Highways England's Comment

- 4.7.1 Highways England notes the Borough's comment and does not propose to comment further.

Environmental Impact

- 4.8 *Due to their modest nature the proposed works would not raise significant concerns in terms of Environmental Impact specific to the borough aside from those raised above. However the*

*Council would draw your attention to the attached letter received from Friends of the Earth which raises general concerns with the scheme and would highlight that such works would not comply with policy EC2 of Hounslow's Local Plan, which seeks to secure a more sustainable local transport network.*

Highways England's Comment

4.8.1 Policy EC2 relates to that contained within the Borough's Local Plan Proposed Submission 2014. Highways England's position is set-out in the response to paragraph 3.4 above.

4.8.2 Further, the primary focus of Policy EC2 is in relation to the local travel network, rather than the strategic road network. Friends of the Earth have made separate representations to the Examining Authority, and Highways England addresses their concerns in answer to those representations.

Flooding and Water Management

4.9 *The proposed scheme does not appear to raise any issues in terms of flooding and water management in the borough.*

Highways England's Comment

4.9.1 Highways England notes the Borough's comment and does not propose to comment further.