

Hayes Community Development Forum

WRITTEN REPRESENTATION

HIGHWAYS ENGLAND'S RESPONSE

1. For 'Deadline VI': Comments on submissions made for Deadline V, 8th January 2016 by Robin Brown on behalf of the Hayes Community Development Forum I refer to the Panel's Questions and the responses made.

2. Answer to Environment & Noise

4.2.1 Cranford Park & 4.7.3 Enhanced Noise Strategy.

Great concern continues to be voiced at the lack of an effective acoustic and visual barrier alongside Cranford Park, particularly in the vicinity of the heritage assets.

Again, it is not understood why the proposed 3.5m high acoustic barrier (ref EM33) ends at the Park subway (circa 11220 chainage) and does not continue further east, albeit not necessarily at the same height. Previously it was assumed that there existed a circa 1.8m high acoustic barrier along the east bound carriageway and this informed the noise modelling. However, now a substantially higher barrier is proposed which seems to indicate that the noise climate from the scheme is predicted to be greater than could have been mitigated by the original 1.8m high barrier. If this is the case then the noise climate could be geographically more extensive and include homes in Cranford lying to the east of the Park's subway.

Highways England Comment

2.1. Highways England will provide a new 2m metre high noise barrier at this location under its commitment, secured under Requirement 22 in the draft Development Consent Order ("DCO"), that any existing barriers included as acoustic barriers in the noise assessment, and which turn out not to be acoustic barriers, will be replaced with acoustic barriers. With this new acoustic barrier in place, the noise reductions with the Scheme in operation will be an improvement on those shown in Sheet 15 of Drawing 12.4 of the ES (Application Document Reference 6-2, APP-265, APP-266, APP-267, and APP-268). Consequently, the setting of these heritage assets will be enhanced, in compliance with paragraphs 5.130 and 5.137 of the National Networks National Policy Statement ("NN NPS").

2.2. This area was included within the enhanced noise mitigation study. However, the assessment indicated that no additional barrier needed to be provided to the east of St. Dunstan's Subway, i.e. to the eastbound and westbound slip roads to junction 3. This is due to the fact there are no permanent residences in this area which would gain any benefit from an additional barrier. Furthermore, the noise level is forecast to reduce as a result of the Scheme. As the principal benefits of noise barriers relate to long term health issues (e.g. sleep disturbance) which are not applicable to effects on short term visitors, provision of additional noise barriers in this area is not considered to be justified or a good use of taxpayer's money.

2.3. The statement "*Previously it was assumed that there existed a circa 1.8m high acoustic barrier along the east bound carriageway and this informed the noise modelling. However, now a substantially higher barrier is proposed which seems to indicate that the noise climate from the scheme is predicted to be greater than could have been mitigated by the original 1.8m high barrier. If this is the case then the noise climate could be geographically more extensive and include homes in Cranford lying to the east of the Park's subway.*" appears to suggest that there were significant adverse noise effects in this area resulting from the

operation of the Scheme and that a substantially higher noise barrier was required to the east bound carriageway to mitigate these.

- 2.4. That is not the case. As shown in Sheet 15 of Drawing 12.4 and Drawing 12.5 in the ES (Application Document Reference 6-2, APP-268 and APP-272), operation of the Scheme (with the noise mitigation proposed in the ES) results in noise reductions in this area.
- 2.5. The purpose of the enhanced mitigation, as reported in the Enhanced Noise Mitigation Study Report (Ref 514451-MUH-00-ZZ-RP-EN-400158), was to provide further improvements to the noise climate within the Scheme corridor, not to mitigate the effects of the Scheme, which, as indicated above, are generally beneficial. Although outside the detailed study area, it can be inferred that the Scheme would bring noise benefits to homes in Cranford lying to the east of the Park's subway
- 2.6. As detailed above, a 2.0m noise barrier will be provided in the Cranford Park area which will also act as a visual barrier. Elsewhere, where no noise barrier is proposed, the latest visual assessment, which was submitted to the Examining Authority on 9 February 2016 (which takes account of the updated vegetation clearance submitted for the second hearing) considers a slight adverse effect at Opening Year 2022 on limited views at the north edge of the Park and a neutral effect by Design Year 2037. Therefore, no additional visual screening is required in this location.

3. Answer to Environment & Noise

4.2.2 Harlington Village CA & 4.7.3 Enhanced Noise Mitigation Strategy

It is noted that additional barriers are recommended (ref EM34) and the Panel will be revisiting this location. This improvement will go some way to tackling the objections and concerns raised at the lack of mitigation in this area.

Highways England Comment

- 3.1. With the additional noise barrier and the low noise surfacing, operation of the Scheme is predicted to result in noise reduction of 4 to 6 dB to properties closest to the motorway and noise reductions of 2 to 4 dB at properties further away, depending on distance from the motorway.

4. Air Quality

4.6. Defra's Improving Air Quality in UK Overview document, 17th December 2015 explains at para 191 "that Highways England will aim to, inter alia, explore and implement new and innovative approaches...on the motorway and truck road network to improve air quality". I would request that the M4SM scheme benefit from this and from the building of a clear picture of pollution through improved monitoring and active management to reduce air pollution.

- 4.1. The outcome of the air quality assessment as reported in Chapter 6 of the Environmental Statement concluded that the Scheme did not result in a significant air quality impact nor affect the UK's reported ability to comply with the Air Quality Directive. Consequently neither air quality monitoring nor mitigation is required.
- 4.2. As part of a programme looking at air quality across the motorway network in England, Highways England is undertaking research in a number of areas to see if changes can be made to mitigate / improve air quality. Examples of this include a feasibility study for promoting the faster uptake of cleaner HGVs on the motorway network, real-time

management of traffic and the trial of an air quality barrier alongside the M62. Highways England needs to conclude its research to determine whether these are viable, cost effective options, and the likely quantum of change brought about by any intervention, before potentially being implemented onto the network.

5. Draft Development Consent Order

8.28 reR22(3) – typing error query. Answer to Noise 4.7.1 & 4.7.2 hours of working/CEMP

At the open session held on 19th November 2015, on behalf of the Forum, I asked for the acoustic barriers, which were to be part of the (enhanced) noise strategy, to be in place before construction of the scheme. And I would now add, for clarity, relevant stretches of barrier to be in place at those locations where work was about to commence. This would assist in mitigating the likely adverse impact of unsocial hours work on the many residents in the vicinity, as in Cranford. Notwithstanding Highway England's proposed typing correction, I request that this approach to mitigation be adopted. I would also draw attention to the good practice adopted by Crossrail in providing temporary acoustic barriers around noisy work sites and extensively notifying local residents of work activities.

Highways England Comment

- 5.1. To enable the safe construction of the acoustic barriers, temporary traffic management will need to be installed. If carried out as a separate contract ahead of the main construction works it would prolong the construction period, which would lengthen the period of disruption to the travelling public and increase the cost of the Scheme.
- 5.2. It would be impractical and unsafe to erect these acoustic barriers during off-peak, night time lane closures ahead of the commencement of the main traffic management and associated 50mph restrictions. Undertaking the works at this time would increase the amount of work and hence disruption during unsocial hours and restrict space required to construct the main works safely.
- 5.3. Whilst the construction of acoustic barriers will not be undertaken in advance of the main works, they will be carried out as early as practicable in the relevant sections (eg generally the acoustic barrier in a section verge will be completed as part of the verge works and hence before the completion of cabling and finishing activities in the relevant areas). This means that the acoustic barriers will offer some noise mitigation for the later construction works.
- 5.4. As secured by Section 12.4 of the outline CEMP, prior to construction, Highways England will seek consent under Section 61 of the Control of Pollution Act 1974 from the local authority, prior to the commencement of construction works. Background noise readings will be undertaken and noise prediction levels will be calculated for key night time activities. These readings will form part of the application for consent under Section 61 of the Control of Pollution Act 1974 and the CEMP will be revised to reflect this, and any conditions imposed on the consent will be defined in the works information.
- 5.5. As set out in Section 4.3 of the outline CEMP, a strategy for regular engagement with key stakeholders will also be developed and included within the CEMP prior to construction. This will include the liaison with local communities, and their representatives, which will be undertaken prior to night time operations in order to raise awareness and reduce the potential impact of the construction activities.

