

## **Registration as objector to the M4 junctions 3-12 Smart Motorway proposal**

**Submitted to the Planning Inspectorate, 2 July 2015**

### **500 word submission and outline of objections:**

Campaign for Better Transport strongly objects to these proposals. We will expand on this summary of the main issues in our full submission.

#### **1. Increase in traffic, air, noise and light pollution**

If this scheme goes ahead, traffic will increase on the motorway, roads leading to it, and the surrounding road network.

Air pollution impacts will be higher than estimated, even though the Environmental Statement (ES) already shows areas where legal limits will be breached if the scheme goes ahead. The vehicle emissions factors used in the ES were updated to be more optimistic about future reductions in 2013 [IAN 170/12 rev3], while all the emerging evidence is that the EuroVI standards test are similar to previous standards in terms of underestimating real world emissions. Following recent legal cases, the technical advice note on assessing the risk of breaching EU directives is currently suspended [IAN175/13].

**The issue of air pollution must be examined in full.**

#### **2. Serious concerns about safety**

The Smart Motorway design has no hard shoulder and only periodic emergency refuge areas, 2.5 km apart. The Institute of Advanced Motorists and Metropolitan Police have expressed their concerns during the consultation process, vehicle recovery organisations oppose the designs, and Highways England's own safety estimates show they are not as safe as the original 'Managed Motorways' that only used the hard shoulder at peak times, and with lower speed limits.

Compared with a baseline 3-lane motorway with hard shoulder and no Smart technology:

- Managed Motorways were found to be 56% safer in overall risk
- Smart Motorways are estimated at only 15-18% safer

**If Highways England were to follow the duty of care obligation to follow good practice they would implement this scheme as a 'Managed Motorway' without all-lane running.**

#### **3. Increase in carbon emissions**

Calculated at more than 4 million extra tonnes.

#### **4. Clear benefits and reduced costs of alternatives**

These include the simple alteration of putting in 'Smart' technology either a) with no hard shoulder running at all or b) with hard shoulder running only at peak times. These options would bring clear safety benefits and, without widening, cost less. Both would create less traffic, air pollution, noise and carbon than the proposed scheme.

**The relative costs and benefits of these options must be assessed.**

Other investments that would improve conditions for drivers without the harms outlined above include:

- improving public transport services and priority along the motorway
- implementing Smarter Choices programmes in surrounding cities and towns, reducing the number of short journeys on the motorway

**Highways England now has dedicated funds for integration with public transport. These measures should be employed on the M4 before any new capacity is considered.**

#### **5. Impact on landscape and biodiversity**

As the M4 does not have a continuous hard shoulder, the scheme entails a significant amount of new works, increasing the road's footprint on the landscape. It is hard to see how widening the road and disrupting the ecology of the surrounding land is compatible with Highways England's new Biodiversity Action Plan.

**July 2015**

Sian Berry  
Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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