

M3 Junctions 3 to 4 Air Quality Mitigation

Summary of Consultation Responses



CONTENTS

CONTENTS	1
1 INTRODUCTION	6
1.1 Purpose	6
1.2 Background	6
1.3 Smart Motorways.....	6
1.4 Environmental assessment	7
1.5 Consultation topic.....	8
1.6 Consultation scope.....	8
2 SUMMARY OF RESPONSES.....	10
2.1 Publicising the consultation	10
2.2 Types of response	10
2.3 Number of responses	11
2.4 On-line survey results.....	11
2.4.1 Questions 1 to 6	11
2.4.2 Question 7 – Acceptability of the measure.....	12
2.4.3 Question 8 – Times of operation	12
2.4.4 Question 9 – Aspects of the proposal giving concerns.....	13
2.4.5 Question 10 – Additional comments.....	13
2.5 Respondents who did not use the on-line survey	13
2.6 Key themes	14
2.6.1 Environmental evidence base	14
2.6.2 Impact on journey time.....	14
2.6.3 Effect on traffic flow.....	15
2.6.4 Heavy Goods Vehicles.....	16
2.6.5 Raising the speed limit.....	16
2.6.6 Enforcement.....	17
2.6.7 Driver information and education	17
2.6.8 Impact of less polluting vehicles.....	17
2.6.9 Off peak speed restriction	18
2.6.10 European Union interference	18
2.6.11 Motorway speed limits and the M3.....	18
2.6.12 Adverse effects on other roads	19
2.6.13 Waste of Money	19
2.6.14 Positive themes.....	20

2.7 Responses from businesses and representative organisations.....	20
2.7.1 Small and Medium Enterprises and Large Companies	20
2.7.2 Representative Organisations and Interest Groups	20
2.7.3 Central or Local Government and Police	21
2.8 How the Highways Agency is responding to the consultation.....	22
3 CONCLUSIONS AND RECOMMENDATIONS.....	23
3.1 Conclusions.....	23
3.2 Options	23
3.2.1 Do nothing.....	23
3.2.2 Smart Motorways	24
3.3 Recommendations.....	25
Appendix A – About the Consultation Exercise	26
Government consultation principles	26
Complaints about the process	26
Appendix B – List of consultees	28

Executive Summary

The Highways Agency has developed proposals to implement smart motorways¹ – all lane running which include the conversion of the hard shoulder to a permanent running lane, increasing the motorways capacity between junctions 2 and 4a of the M3. The scheme will support economic growth, increase motorway capacity and reduce congestion, smooth traffic flows and provide more reliable journey times.

The development of the smart motorway scheme included a detailed assessment of environmental effects, including the impact the scheme may have on local and regional air quality. This assessment indicated that, for operation with an additional lane and at the national speed limit (70mph), the extra capacity and the increased traffic flows that the scheme provides would have adverse impacts on local air quality at Air Quality Management Areas (AQMAs) and sensitive receptors. The Highways Agency consulted on proposals for managing this issue earlier this year.

The consultation provided an opportunity for representative organisations, businesses and the general public to comment on this proposal, including the suggested approach of implementing a 60mph speed limit on this section of the M3 07:00 to 19:00 seven days a week when the smart motorway schemes are complete between junctions 3 to 4.

As a result of the consultation, the Secretary of State for Transport has rejected this approach as the preferred option to mitigating air quality impacts.

The Highways Agency is now rigorously reviewing and investigating alternatives for junctions 3-4 as work progresses on the M3 J2-4a, during the next 12-18 months, to determine if the proposed variable speed limit and daily duration is necessary, in full or over a reduced length of the smart motorway scheme, or for a reduced period of the week/day, to remove significant local air quality impacts. If any proposals continue to include varying speed limits they must only apply when absolutely necessary.

The report concludes that:

- The consultation has shown widespread opposition to the proposal and the Secretary of State has rejected this approach as the Government's preferred mitigation option

¹ *The consultation document refers to the proposed implementation of managed motorways between junctions 2 and 4a of the M3. We now refer to Managed Motorways as Smart Motorways which encompass all sections of our network that incorporate technology to manage congestion and improve journey time reliability. This includes controlling speeds through the use of variable mandatory speed limits to improve traffic flow and providing driver information on overhead signs. Smart Motorways can use technology to open the hard shoulder at times of peak demand or permanently convert it to a traffic lane with additional emergency refuge areas to add extra capacity on the busiest sections of the motorway network.*

- The Highways Agency will be actively reviewing and investigating alternatives to a proposed speed limit over the next 12-18months, that will also satisfy the requirement to have no significant impacts
- These include consideration of alternatives that maintain the 70mph limit wherever possible, particularly when traffic tends to be lighter, such as at weekends and outside peak commuting hours.
- The alternative of not providing this smart motorway scheme will not address the rising traffic levels on this section of the M3. This in turn will lead to worsening congestion with potential adverse impacts on local air quality and economic growth.

If the beneficial impacts on economic growth, increased motorway capacity and reduced congestion that the smart motorway scheme would deliver are to be realised, some form of mitigation for the potential adverse impact on local air quality is required. The eight week consultation period began on 13 February 2014, and closed on 11 April 2014. This paper provides a summary of the consultation responses. Over that period, 262 responses were received through an on-line survey and directly from respondents. The main question in the consultation was “Do you consider that the proposal to introduce a maximum mandatory 60mph speed limit is an acceptable measure to mitigate any adverse impacts that these schemes could have on local air quality?” Overall, 70% of those who commented on the proposal did not agree that this was an acceptable measure.

1 INTRODUCTION

1.1 Purpose

The purpose of this document is to provide a summary of the responses received during the consultation on the proposal to introduce a maximum mandatory 60mph speed limit on the M3 between Junctions 3 and 4. The consultation took place between 13 February 2014 and 11 April 2014 and provided an opportunity for stakeholders, road user groups, other interested parties and members of the public to comment. The Highways Agency has carefully considered the comments raised and this document summarises its response to those comments.

1.2 Background

The M3 between Junctions 3 and 4 is part of the primary strategic route linking London to the South East of England. Currently most of the link carries traffic in excess of the volumes for which it was designed, resulting in congestion and delays to drivers. In order to address these problems, the Highways Agency has developed proposals to implement Smart Motorways – all lane running (i.e. the conversion of the hard shoulder into a permanent traffic lane) and to install variable mandatory speed limits between Junction 2 and 4a.

The M3 Junctions 2 to 4a Smart Motorway Scheme was included in the review of motorway links identified in the “Advanced Motorway Signalling and Traffic Management Feasibility Study” as a potential priority for smart motorways. The scheme was included in the National Roads Programme announced in January 2009 with an undertaking to commence construction before 2015.

1.3 Smart Motorways

Smart motorways – all lane running is a refinement of the smart motorways design already in operation in various parts of the country – not a whole new concept. Smart motorways – all lane running provides:

- Additional capacity by converting the hard shoulder into a running lane and the use of mandatory variable speed limits which are set automatically when congestion is detected.
- Earlier realisation of benefits, such as congestion relief and more reliable journeys, than would be achieved through implementing a widening scheme.
- Lower environmental impacts and costs compared to a widening scheme, as Smart Motorways do not require the use of additional land - maximising the use of what we already have.
- Increased compliance by controlling and managing the motorway through the use of overhead mandatory speed limits, driver information, CCTV coverage and enforcement.

- The ability to inform drivers of unexpected conditions (such as incidents) through the latest generation of roadside variable message signs.
- Automatic systems to detect slow-moving vehicles, providing drivers with warnings of queues ahead.
- Operators in the regional control centres with an ability to protect any broken down vehicles by using overhead signs to warn drivers and close lanes before emergency and recovery services arrive. Full CCTV coverage will help quickly verify the locations of incidents.

It is expected that the smart motorway scheme between junctions 2 and 4a would:

- increase motorway capacity and reduce congestion;
- smooth traffic flows;
- provide more reliable journey times;
- increase and improve the quality of information for the driver;
- maintain and, where possible, improve current safety standards.

1.4 Environmental assessment

The M3 J2 to J4a passes through or close to a number of Air Quality Management Areas (AQMAs) and other sensitive receptors. The development of the Smart Motorway Scheme includes a detailed assessment of environmental effects, including any impact the scheme may have on local and regional air quality. This assessment indicates that, for operation at the national speed limit, the much needed extra capacity and the increased traffic flows that this scheme will provide will also have adverse impacts on local air quality at the AQMAs and sensitive receptors.

Road traffic affects local air quality in a number of ways:

- the volume of traffic, as generally more traffic will result in poorer air quality;
- the flow of vehicles, as stop/start traffic will generate more emissions than smooth flowing traffic;
- the speed of traffic, as emissions rise at low or high speeds.

In order to ensure that there is no significant adverse impact on local air quality, it was previously proposed to implement a 60mph speed limit on this section of the M3 in place of the current national speed limit. This proposal has the effect of:

1.5 Managing the growth in traffic facilitated by the additional lane so that overall vehicle emissions would be lower than they would be without the limit.

Consultation topic

The proposal that we consulted on was that a speed limit of 60mph would operate 07:00 to 19:00 seven days a week on the M3 between junctions 3 and 4 when the smart motorway scheme is completed and operational. Within the section of the M3 covered by this proposal, the national speed limit would continue to apply outside the hours of operation of the 60mph speed restriction, unless variable mandatory speed limits are in operation.

The proposed speed limit would have been in place only for as long as is necessary to mitigate significant air quality impacts. The following factors would influence when that occurs:

- Newer, cleaner vehicles will come into use with the introduction of the new version of the Euro-type engines. This will be driven primarily by the requirements of the Euro VI regulations (affecting heavy goods vehicles) and Euro 6 regulations (mainly affecting cars), At the same time, older, more polluting vehicles will become obsolete and thereby be removed from the road network; and
- Reductions in emissions from the local road network as a result of measures taken by local highway authorities in the AQMAs.

1.6 Consultation scope

The consultation document² stated that the scope was as follows:

“We would like to have your comments on the implementation of a maximum mandatory 60mph speed limit on the M3 between junctions 3 and 4; specifically on how the proposal could affect your organisation or those you represent.

It is important to note that this consultation is about the implementation of a maximum mandatory 60mph speed limit on the above section of motorway in place of the national speed limit and not about the use of variable mandatory speed limits or the principle of smart motorways. Separate consultations have been held on the implementation of variable mandatory speed limits on this section of motorway.”

The geographical scope was defined as:

² The M3 Junctions 3 to 4 Maximum Mandatory Speed Limit Consultation Document is available from the www.gov.uk website at:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/286350/M3_J3_to_J4_MSL_Consultation_Document.pdf

“The proposed maximum mandatory speed limit will apply to the M3 carriageway, including slip roads and motorway to motorway intersections, between junctions 3 (the junction with the A322) and 4 (the junction with the B3272) on this major section of motorway.”

2 SUMMARY OF RESPONSES

2.1 Publicising the consultation

The consultation opened on 13 February 2014. As is usual practice, the consultation document was sent by post to representative organisations and placed on the www.gov.uk website where, in addition to viewing or downloading the consultation document, respondents could access an on-line response form or send an e-mail to the project team. The publication of the consultation was accompanied by publication of a news release to media. This news release was also tweeted via the Highways Agency's regional twitter channel, and Highways Agency spokespeople carried out a number of media briefings (regional and national).

2.2 Types of response

People responded to the consultation in a number of formats.

- On-line survey: the on-line survey, using Survey Monkey software, replicated the response form included in the consultation document. The software enables a rapid analysis and aggregation of the data. 46 (26% of the total) responded in the first week, out of a total of 178 received over the eight week consultation period.
- E-mail responses: many members of the public sent an e-mail to the project team mailbox to register their views. Some of these e-mails included attachments in the form of a copy of the consultation response form. 11 e-mail responses were received on the first day (13% of the total e-mail responses), out of a total of 84 received over the eight week consultation period.

2.3 Number of responses

The tables below set out the number of responses received via the different channels.

Type of response	No. received	Notes
On-line survey	178	
Direct contact	89	See breakdown in Table 2 below
Total	267	

Table 1: Summary of responses by type

Type direct contact	No. received	Notes
E-mail or letter to the project team	89	Correspondence direct to the Highways Agency e-mail address
Other forms of direct contact	0	
Sub total	89	

Table 2: Breakdown of direct contact (e-mail or letter) by type

2.4 On-line survey results

Respondents accessing the www.gov.uk website were invited to use the on-line survey to provide their comments. The on-line survey followed the same structure as the response form within the consultation document.

2.4.1 Questions 1 to 6

Questions 1 to 6 covered confidentiality, contact information and representation. In terms of the proportion of responses from individual members of the public and responses from other organisations, the following breakdown was provided by those who answered the question:

Please select one option from the list below that best describes you, your company or organisation.		
Answer Options	Response Percent	Response Count
Small to Medium Enterprise (up to 50 employees)	2.4%	4
Large Company	4.1%	7
Representative Organisation	0.0%	0
Trade Union	0.0%	0
Interest Group	0.0%	0
Local Government	1.2%	2
Central Government	0.0%	0
Police	0.0%	0
Member of the Public	92.3%	157
Other (please describe)		0
<i>answered question</i>		170
<i>skipped question</i>		8

2.4.2 Question 7 – Acceptability of the measure

Do you consider that the proposal to introduce a maximum mandatory 60mph speed limit is an acceptable measure to mitigate any adverse impacts that these schemes could have on local air quality?		
Answer Options	Response Percent	Response Count
Yes	28.5%	45
No	70.5%	113
Please add any comments		112
<i>answered question</i>		158
<i>skipped question</i>		20

Those who provided comments had all answered the question first, and largely used the opportunity to re-iterate their opposition to the measure, in some cases with an explanation for why they considered the measure unacceptable.

2.4.3 Question 8 – Times of operation

Which of the following times of operation do you consider most acceptable?		
Answer Options	Response Percent	Response Count
7 days a week, 24 hours per day (all day, every day)	25%	23
7 days a week, daytime only (eg 07:00 to 19:00)	9.8%	9
7 days a week, night time only (eg 19:00 to 07:00)	1%	1
Monday to Friday, 24 hours per day (all day Mon-Fri)	2.2%	2
Monday to Friday, daytime only (eg 07:00 to 19:00)	2.2%	2
Monday to Friday, night time only (eg 19:00 to 07:00)	2.2%	2
Monday to Friday, peak hours only (am and pm)	57.6%	53
Other days or hours of operation (please specify)		66
<i>answered question</i>		158
<i>skipped question</i>		20

Of the 66 respondents who chose “other days or hours of operation” the majority stated were no days or hours of operation they considered were acceptable. Among the respondents who chose one of the other options, a peak hours restriction Monday to Friday was seen as the most acceptable approach. A small number felt that it should be a peak hour closure but that peak hour on the M3 was 06:00 to 09:30 and 16:30 to 19:30.

2.4.4 Question 9 – Aspects of the proposal giving concerns

Are there any aspects of the proposal to introduce a maximum mandatory 60mph speed limit on the M3 between junctions 3 and 4 which give you concerns?		
Answer Options	Response Percent	Response Count
Yes	78.7%	126
No	21.3%	34
If yes, please give your comments:		125
<i>answered question</i>		160
<i>skipped question</i>		18

Those who provided comments largely used the opportunity to re-iterate their opposition to the measure.

2.4.5 Question 10 – Additional comments

Are there any additional comments you would like to make about the proposal to introduce a maximum mandatory 60mph speed limit on the M3 between junctions 3 and 4?		
Answer Options	Response Percent	Response Count
Yes	53%	84
No	47%	75
If yes, please give your comments:		84
<i>answered question</i>		159
<i>skipped question</i>		19

Those who provided comments largely used the opportunity to re-iterate their opposition to the measure. Some respondents, however, made additional observations (reviewed below) or, in a very few cases, offered their support for the measure.

2.5 Respondents who did not use the on-line survey

A number of respondents did not use the on-line survey. Of the 88, people or organisations who contacted the Highways Agency 86 offered an opinion whilst the remaining two did not make their views clear directly with their comments, the responses can be summarised as follows:

Against the proposal	In favour of the proposal
46 (53%)	41 (47%)

Table 3: Summary of responses that did not use the on-line survey

The percentage of respondents opposed to the proposal is lower than the results from the on-line survey (section 2.4.2).

2.6 Key themes

The overriding theme is one of opposition to any form of a maximum speed limit below the national speed limit on a motorway. Other key themes that emerge from both the on-line survey and the public correspondence are listed below.

Note that the number of people mentioning a particular theme does not equal the total number of responses as some people made more than one comment or observation. Additionally some people made their disapproval for the scheme clear but did not provide any appropriate comment or justification.

2.6.1 Environmental evidence base

Some respondents questioned the validity, reliability or even the existence of supporting environmental evidence (mentioned by 16 respondents).

Highways Agency response

The consultation document summarized the evidence from the Environmental Assessment Report. Respondents requesting additional information were advised that the Environmental Assessment Report was available, and the final version was published on the Highways Agency project web page.

The analysis contained in the draft Environmental Assessment Reports led the Highways Agency to conclude that a reduction in the speed limit was necessary to ensure that there would be no significant adverse effects on local air quality from the smart motorway scheme. The Highways Agency therefore commenced the consultation as soon as this draft report was prepared, in accordance with the government's consultation principle that engagement should begin early in policy development when the policy is still under consideration and views can genuinely be taken into account.

2.6.2 Impact on journey time

Respondents considered that the speed limit reduction would increase journey time by an unacceptable amount (mentioned by 10 respondents). A negative economic effect was also cited. This is seen by some as a price not worth paying for air quality gains.

Highways Agency response

Table 1 below shows the effect of imposing a speed restriction between Junctions 3 and 4 on the M3 eastbound carriageway and M3 westbound carriageway respectively as part of the air quality mitigation measures. It should be noted that the time delay is the maximum that should occur during free flow conditions as during higher flows (e.g. during the peak periods), speeds would normally already drop below 70mph and a typical smart motorway may already be operating at 60mph or 50mph to minimise further congestion and flow breakdown.

SPEED	70mph (seconds)	60mph (seconds)	Maximum Time Delay (seconds)
Time to travel 1 mile	51.4	60.0	8.6
Time to travel 4 Km (eastbound)	126.5	147.6	21.1
Time to travel 4.5 Km (westbound)	145.0	169.1	24.2

Table 4: Maximum time delay due to AQ speed restriction on M3 carriageway

One of the key objectives for the smart motorway scheme is to provide additional capacity to relieve the existing congestion. Implementing a speed limit of 60mph is intended to manage any traffic growth in order to ensure that the potential impact on local air quality is mitigated.

A 60mph speed limit is likely to extend overall journey times for car drivers slightly at certain times of the day (mainly off peak), but journey time reliability (the ability to predict with reasonable reliability how long a journey will take) is expected to improve significantly with the reduction in congestion.

The business case for the smart motorway scheme includes allowance for operation at 60mph from 07:00 to 19:00 seven days a week and the scheme shows a positive benefit to cost ratio, indicating that the proposal does not have a negative economic impact.

2.6.3 Effect on traffic flow

Some people thought that the proposal would actually cause more pollution because it would create slow moving traffic, congestion, braking or standing traffic, which would “inevitably” cause more pollution (mentioned by 2 respondents).

In similar vein, some respondents considered that the proposal would actually cause more congestion as motorists slowed down to 60mph from the national speed limit (mentioned by 20 respondents).

Some respondents felt that the proposal would make the road more dangerous as they considered that drivers would compensate by speeding up outside the 60mph zone (mentioned by 19 respondents) or that a lower speed limit on a motorway was inherently more dangerous. Many of these respondents felt that road safety was the only justifiable reason to lower speed limits.

Highways Agency response

The smart motorway scheme provides additional capacity to ease the existing congestion and provide for future growth. The modelling indicates that traffic would be moving in free flow conditions and there is no reason to suppose that a maximum

speed of 60mph, especially where the traffic is flowing freely, would lead to congestion.

Similarly, our analysis shows that a 10mph reduction from the national speed limit where the traffic is flowing freely would improve congestion. Drivers successfully manage the transition between different speed limits already, for example when slowing to enter, or accelerating on leaving, sections of motorway where variable mandatory speed limits are in operation.

2.6.4 Heavy Goods Vehicles

The relationship between emissions produced by Heavy Goods Vehicles (HGVs), limited to 56mph, and cars or light vehicles, limited to 70mph, was cited by 18 respondents, who considered that the proposal would not have the desired effect because HGVs were unaffected by the proposal. 3 responses mentioned restricting HGVs from overtaking, and a further 11 respondents specifically highlighted concerns about overtaking HGVs travelling at 56mph within an area where they could not exceed 60mph.

Highways Agency response

Restricting HGVs would have a number of very undesirable consequences. Firstly, it would affect business and the local economy. Secondly, restricting HGVs on the motorway would mean that they would, in many cases, divert onto other, less suitable routes.

The smart motorway scheme would increase capacity and ease congestion, allowing HGVs to travel at a relatively constant speed. When HGVs can travel without slowing down and accelerating away, they operate most efficiently and produce the least emissions. If HGVs are diverted onto local roads, this would bring the emissions closer to local people, and the constant stop/start conditions on local roads would make matters worse still. Keeping the HGVs moving on the motorway creates the least pollution overall.

The Highways Agency is committed to getting the best use out of the road network and restricting heavy vehicles from overtaking is not appropriate for all sections of our network. HGVs are already restricted from using the outside lane where there are three or more lanes.

2.6.5 Raising the speed limit

Some respondents considered that raising the speed limit to 80mph would be a preferable solution, allowing traffic to transit through the area more quickly (mentioned by 5 respondents).

At the same time, comparisons were drawn by some respondents with higher speed limits in force in parts of mainland Europe, and the unrestricted sections of German Autobahns were cited (mentioned by 5 respondents).

Highways Agency response

A speed limit ensures that any increase in the number of vehicles using the motorway does not make air quality worse for local people. It also remains the case that vehicle emissions are lower from vehicles operating below the national speed limit. Speed limits across Europe vary according to local circumstances, and this proposal is no different. For example, sections of the Dutch motorway network around Amsterdam, Rotterdam, The Hague and Utrecht are subject to a permanent 80km/h (50mph) speed restriction for air quality reasons. As referred to in the Executive Summary, the Highways Agency is rigorously reviewing and investigating alternatives to implementing a 60mph, 7am-7pm, 7 days a week speed restriction.

2.6.6 Enforcement

Some respondents saw the proposal as a way to generate funds via speed cameras (mentioned by 9 respondents). A further 14 respondents commented on the enforceability of the proposal and that the scheme would only work if it was enforced effectively.

Highways Agency response

Speed camera enforcement is part of every smart motorway scheme, including those already in operation. Cameras are part of an overall package of technology measures aimed at smoothing traffic flow and improving journey times on Smart Motorways. Their function is to encourage compliance to ensure that drivers experience the full benefit of these improvements. Detailed discussions will take place with the police forces involved on the enforcement proposals.

2.6.7 Driver information and education

A need to ensure drivers are informed about the reasons behind the proposed speed limit in order to encourage compliance and reduce the need for enforcement was raised by some representative organisations (mentioned by 2 respondents).

Highways Agency Response

The Highways Agency recognises that a communications strategy will be needed should the proposal go ahead. This strategy would take account of the views expressed by stakeholders on the need to ensure drivers are informed about the reasons behind the proposed speed limit in order to encourage compliance.

2.6.8 Impact of less polluting vehicles

7 respondents pointed out that modern vehicles are less polluting than older vehicles, suggesting that this rendered the proposal unnecessary. Some people considered it “unfair to penalise motorists who drive less polluting vehicles” and expressed the view that the focus should instead be on targeting more polluting vehicles.

Highways Agency response

The Highways Agency's analysis does take air pollution and vehicle emission trends into account. The following is taken from the consultation document:

"It is expected that vehicle emissions will reduce as more new, cleaner vehicles come into use and older, more polluting vehicles become obsolete. [...] this will be driven primarily by the requirements of the Euro VI regulations (affecting heavy goods vehicles) and Euro 6 regulations (mainly affecting cars) which come into force in 2014. The proposed maximum mandatory 60mph speed limit will be reviewed to determine whether it is still needed as air quality improves."

The Highways Agency does not have the power to impose different speed limits on different types of vehicle beyond those already prescribed in law. There are already differential rates of Vehicle Excise Duty related to vehicle performance.

2.6.9 Off peak speed restriction

16 respondents (including representative organisations) questioned the need to reduce speed under light traffic conditions and some considered that the scheme could only be justified in peak times. Of these 16 respondents 7 specifically stated that technology exists that will allow the 60mph speed limit to be put in place when the pollution triggers the required level.

Highways Agency response

This response has some correlation in the on-line survey where those respondents who offered a view on times of operation (question 8) showed a preference for peak hour only operation over the other alternatives.

Analysis of journey times (see Table 4 above) indicates that the proposed speed limit will only have a marginal impact on journey times in the inter-peak period. While it is the overall combination of effects that make this proposal effective, the detailed hours of operation are one area where the Highways Agency is investigating further refinements to the operational regime and these observations from respondents will help to inform that process.

2.6.10 European Union interference

A number of respondents saw the proposals as being driven by the European Union (mentioned by 12 respondents).

2.6.11 Motorway speed limits and the M3

7 respondents on the survey and a further 9 by email questioned why the measure was proposed for the M3 between junctions 3 and 4 rather than other sections of motorway. A further 3 respondents did not consider that the motorway passed through heavily populated areas. Some respondents were concerned that the

proposal was “only the thin end of the wedge” leading to further restrictions (mentioned by 8 respondents), while other respondents referred to the “war on the motorist” (mentioned by 4 respondents).

Highways Agency response

The consultation document has explained that this smart motorway scheme could have significant local air quality impacts for people living and working at locations along the M3 between junction 3 and 4. The motorway passes alongside residential areas in the Bagshot, Lightwater, Frimley and Camberley in particular.

The consultation has shown widespread opposition to the proposal and the Secretary of State has rejected this approach as the Government’s preferred option.

The Highways Agency is investigating alternatives to the 60mph speed, as well as considering whether it can remove the impact of a 7am-7pm/7days a week operational regime of 60mph, during periods on the network when traffic is lighter such as weekends and outside of commuting hours.

2.6.12 Adverse effects on other roads

The suggestion was made that the proposal would lead to congestion or would shift traffic onto other roads (mentioned by 4 respondents).

Highways Agency response

The Environmental Assessment Report is based in part on a traffic forecast which models how traffic flows on a whole network of routes are likely to evolve over time. At a speed of 60mph, this model indicates that traffic is not displaced onto other routes. However, the model also suggests that if the speed limit were lowered further there could be traffic displaced onto local roads in preference to the motorway.

2.6.13 Waste of Money

Several respondents believed that the scheme was a waste of money which could be better spent in other areas including increasing the quality of the existing roads or funding better public transport (mentioned by 15 respondents).

Highways Agency Response

Smart Motorways are about maximising the use of what we already have through use of technology to enable the conversion on the hard shoulder into a permanent traffic lane. The smart motorway scheme on the M3 is part of the Government’s investment into England’s motorways and major A-roads, which will see up to £3 billion a year invested in improving our roads by 2021, underpinning economic growth and high quality jobs across the regions.

2.6.14 Positive themes

13 respondents were in favour of the proposal. 5 respondents considered that air quality was a legitimate reason for a speed restriction, while 7 (plus 9 that responded by email) respondents considered that this approach should be extended. 7 respondents (generally those close to the motorway) were also in favour of the measure because of the impact it will have on reducing noise levels.

2.7 Responses from businesses and representative organisations

2.7.1 Small and Medium Enterprises and Large Companies

Among respondents from both Small and Medium Enterprises and Large Companies are a number of employees whose response suggests that it is not a formal one on behalf of the organisation. This is based either on the supporting text or because they have requested confidentiality (15 respondents). However, all those responses have been left in the category selected by the respondent. Four companies responded directly to the Highways Agency without indicating their size; for the purpose of this analysis they have been added to the Small and Medium Enterprise category.

68% of business respondents were not in favour of the proposal, which correlates closely with views from members of the public.

2.7.2 Representative Organisations and Interest Groups

This category includes large membership organisations such as motoring (5) or freight haulage organisations (2) and professional bodies (1). These organisations were generally in favour of the proposal however some concerns were expressed.

The RAC were in favour but would like to see shorter periods in which it was implemented and not at weekends.

The AA carried out a member survey on their website and 52% of their members did not think it would make any difference to air quality and 73% felt it would be wrong to keep it in place 7 days a week.

The Freight Transport Association and the Society of Motor Vehicle Engineers are not happy with the duration of the limit but would support a system that operated by sensors to bring in the limit as and when required. This view is supported by the Intelligent Transport Systems, who supplied details of the systems that could operate this.

The Alliance of British Drivers and the Chartered Institute of Highways and Transportation do not support the proposal stating that road safety is the only reason that speed limits should be reduced and that road safety may suffer as a consequence.

Environmental groups (1) commented, but simply pointed in the direction of current legislation and provided no views.

2.7.3 Central or Local Government and Police

Responses from these organisations (9) have been grouped together as there is a close working relationship between local government and local police forces in particular. Two members of the public responded under the category “Local Government”. These are not responses on behalf of the police force or the local authority in question. They have therefore been treated as responses from members of the public and are included in the analysis above.

Unitary, county and district authorities (4), along with the police (2), responded with detailed comments on the proposal, but all except Hart District Council support the proposal. These included:

- Surrey Heath Council
- Windlesham Parish Council
- Surrey County Council
- Sussex Police
- Surrey Police

Surrey County Council consulted with the Cabinet member for Transport and their Environmental and Infrastructure Directorate and support the principle and the time frame. They would however like assurances / evidence that the air quality levels will be within acceptable limits within the 07:00 to 19:00 timeframe and that the speed limit will not be removed upon reaching 2019 (the predicted year that air quality will be within acceptable limits) until it is proven that the limits will not be exceeded. Surrey County Council has stated that they would like to see the limits extended to include Junctions 2 to 3. They also have concerns that the Environmental Assessment Report show some NO₂ exceedances even with the 60mph speed limit. They would like to see further evidence/mitigation measures from the HA. They also request that the Highways Agency ensure the police are content that they can resource the level of enforcement stated within the report.

Sussex Police support the proposal but request that the HA carefully consider driver education. In addition Surrey Police stated that they would not object to the proposal but wanted to ensure that a Memorandum of Understanding was in place between the Highways Agency and the Police to ensure effective enforcement. It is the Highways Agency’s intention to sign up to such an agreement prior to the implementation of such works and work is currently underway to develop such a document.

The response from Hart District Council stated the Councillors views on the scheme and confirmed that they are against the proposal. In particular they expressed their concern over the length of time the reduced speed limit is to be imposed. They also feel that there is insufficient evidence to show that the proposal will work and have requested further details of specific evidence of the air quality issues in particular the timings of the peak readings.

Other groups that responded to the survey include Bean Residents Association, Chobham Common Preservation Society, Public Health England and Windlesham Society. They all support the scheme although Windlesham Society would like to see the 60mph speed limit extended throughout the area of the smart motorway scheme.

2.8 How the Highways Agency is responding to the consultation

The Highways Agency is grateful to the large number of people and organisations who have taken the time to respond to this consultation. We will be responding to this consultation in several ways:

- this report provides a summary of the responses received;
- the Highways Agency will continue to work closely with the local authorities and emergency services along the route in developing a smart motorway project for the M3; and

3 CONCLUSIONS AND RECOMMENDATIONS

3.1 Conclusions

The analysis of the responses from members of the public to this consultation indicates that the overwhelming reaction to the proposal was negative, with 70.5% of respondents using the on-line survey and 59% of those who contacted the Highways Agency directly being opposed to the proposal.

Responses from representative organisations varied, but generally were in favour of the principle. Hart District Council were the only authority to object, whilst Surrey County Council, Surrey and Sussex Police and all other local authorities and residents groups were supportive of the proposal. Of the other motoring groups that responded four were in favour with three against the scheme, however, of these three the AA responded with results of a survey and not their own opinions.

3.2 Options

Various options have been considered in relation to the M3 Scheme to mitigate any adverse impact on local air quality. These include operational regimes such as restricting different types of vehicle or physical interventions such as barriers or tunnels. Some representative organisations in particular suggested using variable mandatory speed limits in conjunction with pollution measuring equipment to provide a dynamic response. The Highways Agency is continuing to research these options, but currently there is no dynamic mitigation responsive to real-time monitoring known or in research in the UK, Europe or worldwide. Any alternatives would need to be viable and provide measurable benefits.

3.2.1 Do nothing

One option would be to do nothing. This scenario takes into account the predicted future traffic flow assuming that the proposed smart motorway scheme does not proceed. The net effect of not taking any action would mean:

- congestion on the M3 junction 2 to 4a would continue to rise as no additional capacity would be provided to meet the predicted increased demand, resulting in journey times becoming longer and average speeds decreasing;
- the potential for continued increases in traffic flows and associated increases in pollutant emissions providing a deterioration in local air quality for people living in proximity to the motorway; journey time reliability would be likely to get worse as congestion increases;

negative effects on the local economy and local regeneration plans as a consequence of the congestion;

3.2.2 Smart Motorways

The alternative is to implement smart motorways. The smart motorway scheme between junctions 2 and 4a would:

- support economic growth;
- increase motorway capacity and reduce congestion;
- be likely to improve safety for those that use or work on the motorway;
- smooth traffic flows;
- provide more reliable journey times;
- increase and improve the quality of driver information and;
- Current assessments identify there is a need to introduce a speed limit of 60mph from 07:00 to 19:00, seven days a week, for an initial period (over the section of the scheme from midway between Junctions 3 and 4 to just east of Junction 4 – around 4km in the eastbound direction and 4.5km in the westbound).

The smart motorway scheme would deliver the benefits described above whether the maximum speed limit is the national speed limit (70mph) or 60mph; the key difference would be the rate at which the predicted traffic growth occurs and the additional capacity is taken up. The Environmental Assessment Report indicates that the smart motorway scheme would also worsen local air quality for people living close to the motorway unless mitigation measures are put in place. The proposal that formed the basis of the consultation would ensure that the extra capacity and some of the increased traffic flows that the smart motorway scheme provides can be realised as early as possible without adversely affecting local air quality.

Work continues to determine if, when and how any restriction could be lifted, and this work will be informed by the response to the consultation and the Secretary of State's decision to reject, as the Government's preferred option, the current proposal consulted on. Particular focus will be given to:

- when any weekend restriction could be lifted;
- whether the restriction could be applied only during peak hours;
- when the distance over which the speed limit applies could be reduced, for example starting or ending the restriction at a different gantry; and
- when the proposed restriction could be lifted completely.

This requires further modelling to be undertaken. This will:

- use of the latest National Traffic Forecasts (including any changes to HGV traffic levels);
- take committed and reasonably certain developments into consideration;
- use the latest version of the Transport Analysis Guidance (January 2014) published by the Department for Transport; and
- take account of long term trends for vehicle emissions and recently published new Defra National Emission Forecasts.

The above are subject to regular review to ensure that they reflect current and predicted trends.

3.3 Recommendations

Before arriving at a final recommendation the Highways Agency has very carefully considered the responses received to this consultation. This process has identified considerable opposition to the speed limit proposal. The Highways Agency has considered this carefully against both the option of doing nothing and the demonstrable benefits which will accrue should the smart motorway scheme be implemented. The Highways Agency has concluded that, in response to the large number of negative responses to the implementation of a 60mph speed limit to mitigate air quality impacts, it will be reviewing and investigating alternatives (as listed in 3.2 above) as work progresses on the M3 J2-4a during the next 12-18 months, to determine if the proposed variable speed limit and daily duration is necessary to reduce air quality impacts. As stated in 3.2, any alternatives must provide the same degree of demonstrable and verifiable benefits as the imposition of the 60mph speed limit provides in mitigating poor air quality and so avoiding significant air quality impacts. If, after this process, no alternatives can be identified which provide the same measurable benefits, any proposed mitigation that continues to include variable speed limits, must only include the application of such limits when absolutely necessary.

Under such a scenario, the Highways Agency would be actively monitoring air quality levels when the schemes become operational. This would determine whether any variably applied speed limit was still required and ensure it was only ever applied as a last resort and on the most limited basis possible.

Appendix A – About the Consultation Exercise

Government consultation principles

The consultation was carried out in accordance with the Government's Consultation Principles. The consultation criteria are listed below.

- 1) Subjects of Consultation** – The objectives of any consultation should be clear and will depend to a great extent on the type of issue and the stage in the policy-making process – from gathering new ideas to testing options.
- 2) Timing of Consultation** – Engagement should begin early in policy development when the policy is still under consideration and views can genuinely be taken into account.
- 3) Making information useful and accessible** – Policy makers should think carefully about who needs to be consulted and ensure the consultation captures the full range of stakeholders affected. Information should be disseminated and presented in a way likely to be accessible and useful to the stakeholders with a substantial interest in the subject matter.
- 4) Transparency and Feedback** – The objectives of the consultation process should be clear. To avoid creating unrealistic expectations, any aspects of the proposal that have clearly been finalised and will not be subject to change should be clearly stated.
- 5) Practical Considerations** - Consultation exercises should not generally be launched during local or national election periods.

Further information about the Consultation Principles can be located on the Gov.uk website:

<https://www.gov.uk/government/publications/consultation-principles-guidance>

Complaints about the process

Several respondents suggested that the consultation did not accord with the principles set out above. Detailed responses were sent to those correspondents. The complaints were that:

- Insufficient information was made available to enable a detailed response to be made.

The analysis contained in the draft Environmental Assessment Reports (EAR) led the Highways Agency to conclude that a reduction in the speed limit was necessary to ensure that there would be no significant adverse effects on local air quality from the smart motorway scheme. The Highways Agency

therefore commenced a consultation on this topic as soon as this draft report was prepared, in accordance with the government's consultation principle that engagement should begin early in policy development when the policy is still under consideration and views can genuinely be taken into account. In these cases, the correspondent was directed to the final Environmental Assessment Report (EAR), which was made publicly available in full from 6 February.

- The consultation was flawed because the precise detail of the proposed measure was not yet final.

Correspondents were referred to the second of the consultation principles, explaining that the consultation had been started as soon as it was clear that the draft EAR confirmed that operation at the national speed limit would lead to a significant adverse impact on local air quality.

Appendix B – List of consultees

Government / Local Government Bodies	
Basingstoke and Deane Borough Council Civic Offices London Road Basingstoke RG21 4AH	Bracknell Borough Council Easthampstead Town Square Bracknell RG21 4AH
Buckinghamshire County Council Buckingham Centre Verney Close Buckingham MK18 1JP Email: customerservices@buckscc.gov.uk	East Hampshire District Council Penns Place Petersfield Hampshire GU31 4EX
Elmbridge Borough Council Civic Centre High Street Esher Surrey KT10 9SD	Guildford Borough Council Millmead House Millmead Guildford Surrey GU2 4BB Email: customerservices@guildford.gov.uk
Hampshire County Council The Castle Winchester Hampshire SO23 8UJ Email: roads@hants.gov.uk	Hart Borough Council Civic Offices Harlington Way Fleet Hampshire GU51 4AE Email: enquiries@hart.gov.uk Robert Jackson (Development Manager) robert.jackson@hart.gov.uk
Hillingdon London Borough Civic Centre High Street Uxbridge Middlesex UB8 1UW	Hounslow London Borough Lampton Road Hounslow TW3 4DN

Summary of Consultation Responses

<p>Mole Valley District Council Pippbrook Dorking Surrey RH4 1SJ</p>	<p>Reading Borough Council (Berkshire) Civic Centre RG1 7AE</p>
<p>Runnymede Borough Council Runnymede Civic Centre Station Road Addlestone Surrey KT15 2AH</p> <p>Email: general.enquiries@runnymede.gov.uk</p> <p>Ian Maguire (Head of Planning) ian.maguire@runnymede.gov.uk</p>	<p>Rushmoor Borough Council Council Offices Farnborough Road Farnborough Hampshire GU14 7JU</p> <p>Email: customerservices@rushmoor.gov.uk</p> <p>Keith Holland (Head of Planning) keith.holland@rushmoor.gov.uk</p>
<p>Slough Borough Council Landmark Place High Street Slough SL1 1JL</p>	<p>South Bucks District Council Capswood Oxford Road Denham Bucks UB9 4LH</p> <p>Email: sbdc@southbucks.gov.uk</p>
<p>Spelthorne Borough Council Council Offices Knowle Green Staines-upon-Thames TW18 1XB</p> <p>Email: customer.services@spelthorne.gov.uk</p>	<p>Surrey County Council Centre Room 296-298 County Hall Penrhyn Road Kingston upon Thames Surrey KT1 2DN</p>
<p>Surrey Heath Borough Council Knoll Road Camberley Surrey GU15 3HD</p>	<p>West Berkshire Borough Council Market Street Newbury West Berkshire RG14 5LD</p>
<p>Windsor & Maidenhead Borough Council Town Hall St Ives Road Maidenhead Berkshire SL6 1RF</p>	<p>Wokingham Borough Council Shute End Wokingham Berkshire RG40 1BN</p> <p>Email: wokinghamdistrict@wokingham.gov.uk</p>

Summary of Consultation Responses

Wayne Scott Bracknell Forrest Borough Council Easthampstead House Town Square Bracknell Berkshire RG12 1AQ Email: wayne.scott@bracknell-forest.gov.uk	Government Association Government House Smith Square London SW1P 3HZ
Core Responders / Legal	
Ambulance Services Association Friars House 157-168 Blackfriars Road London SE1 8EU Email: reception@asa.uk.net	Ashford and St Peter's NHS Foundation Trust London Road Ashford Middlesex TW15 3AA
Association of Police Officers (ACPO) PO Box 481 Fareham Hampshire PO14 9FS Email: enquires@acro.pnn.police.uk	Atkins Euston Tower 286 Euston Road London NW1 3AT Email: info@atkinsglobal.com
Central Council of Magistrates Courts Committees 185 Marylebone Road London NW1 5QB	Chartered Institute of Logistics and Transport Earlestrees Court Earlstrees Road Corby Northants NN17 4AX Email: steve.agg@ciltalk.org.uk
Chief Executive VOSA Berkeley House Croydon Street Bristol Email: enquiries@vosa.gov.uk	Civil Engineering Contractors Association (CECA) 1 Birdcage Walk London SW1H 9JJ Email: lauraellis@ceca.co.uk
Criminal Justice Unit Metropolitan Police Station New Scotland Yard Broadway London SW1H 0BG	Crown Prosecution Service 5th Floor, Rose Court 2 Southwark Bridge London SE1 9HS

Summary of Consultation Responses

Frimley Park Hospital NHS Foundation Trust Portsmouth Road Frimley Surrey GU16 7UJ	Government Office for South East Bridge House 1 Walnut Tree Close Guildford GU1 4GA
Hampshire Fire & Rescue Rushmoor Fire Station 8 Lynchford Road Farnborough Hants GU14 6BF	Hampshire Police Whitchurch Police Station Dances Lane Whitchurch RG28 7EG
Hampshire Police Headquarters West Hill Romsey Road Winchester Hampshire SO22 5DB Email: postmaster@hampshire.pnn.police.uk	Justices Clerk Society Port of Liverpool Building Pier Head Liverpool L3 1BY Email: jcs@hmcts.gsi.gov.uk
Local Government Association Government House Smith Square London SW1P 3HZ	Magistrates Association 28 Fitzroy Square London W1P 6DD Email: information@magistrates-association.org.uk
National Associations of Local Councils 109 Great Russell Street London WC18 3LD	Police Federation 15/17 Langley Road Surbiton KT6 6LP Email: gensec@polfed.org
Princes Margaret Hospital Osborne Road Windsor Berkshire SL4 3SJ	South Central Ambulance Service Foundation Trust Units 7 and 8 Talisman Business Centre Talisman Road Bicester Oxfordshire OC26 6HR
South Central Ambulance Service Whitchurch Police Station Dances Lane Whitchurch RG28 7EG	South Central Ambulance Service The Horseshoe Bolters Lane Bamstead Surrey SM7 2AS

Summary of Consultation Responses

South East Fire and Rescue Service Regional Management Board Surrey County Council 296-298 County Hall Penrhyn Road Kingston upon Thames Surrey KT1 2DN	Surrey Fire and Rescue St Davids 70 Wray Park Road Reigate Surrey RH2 0EJ
Surrey Police Roads Policing Unit Operational Support Division Bretlands Road Chertsey Surrey KT16 9QN Email: 101@surrey.pnn.police.uk	Thames Valley Police Amersham Police Station King George V Road Amersham Buckinghamshire HP6 5AL
Upton Hospital Albert Street Slough Berkshire SL1 2BJ	Liz Cook Surrey Police Camera Enforcement P.O Box 930 Guildford Surrey GU4 8WU
Environmental Organisations	
Campaign to Protect Rural England National Office 128 Southwalk Street London Email: info@cpre.org.uk	Chobham National Nature Reserve School Lane Pirbright Woking Surrey GU24 0JN
English Heritage 1 Waterhouse Square 138 – 142 Holborn London EC1N 2ST Email: customers@english-heritage.org.uk	Friends of the Earth 26-28 Underwood Street London N1 7JQ Email: info@foe.co.uk
Hampshire and Isle of Wight Wildlife Trust Beechcroft House Vicarage Lane Curdridge Hampshire SO32 2DP Email: feedback@hwt.org.uk	Hampshire Biodiversity Information Centre Hampshire County Council The Castle Winchester Hampshire SO23 8UJ Email: enquiries.hbic@hants.gov.uk

Summary of Consultation Responses

<p>Hampshire Mammal Group The Old Cartshed Herriad Park Basingstoke Hampshire RG25 2PL</p>	<p>Surrey Amphibian & Reptile Group Panorama Folly Hill Farnham Surrey GU9 0BD</p> <p>Email: steve@surrey-arg.org.uk</p>
<p>Surrey Wildlife Trust School Lane Pirbright Woking Surrey GU24 0JN</p> <p>Email: info@surreywt.org.uk</p> <p>David Boddy david.boddy@surreywt.org.uk</p>	<p>The Bat Conservation Trust 5th Floor Quadrant House 250 Kennington Lane London SE11 5RD</p> <p>Email: enquiries@bats.org.uk</p>
Road User / Safety Organisations	
<p>Association of British Drivers PO Box 2228 Kenley Surrey CR8 5ZT Email: mark.mcarthur-christie@abd.org.uk</p>	<p>Association of British Insurers 51 Gresham Street London EC27 7HQ Email: otto.thoresen@abi.org.uk</p>
<p>Association of Car Fleet Operators (ACFO) 68 The Boulevard Worthing BN13 7QT Email: info@airso.org.uk</p>	<p>Automobile Association Ltd Norfolk House Priestly Road Basingstoke Hampshire RG24 9NY Email: publicaffairs@theaa.com</p>
<p>AXA Assistance The Quadrangle 106-118 Station Road Redhill Surrey RH1 1PR</p>	<p>BRAKE PO BOX 272 Dorking Surrey RH4 4FR Email: admin@brake.org.uk</p>

Summary of Consultation Responses

British Independent Motor Trade Association (BIBA) 8th Floor John Stow House 18 Bevis Marks London EC3A 7JA Email: enquiries@biba.org.uk	British Motorcyclists Federation 3 Oswin Road Brailsford Industrial Estate Braunstone Leicester LE3 1HR Email: chris.hodder@bmf.co.uk
British Roads Federation Pillar House 194 -202 Old Kent Road London SE1 5TG	British Vehicle Renting and Leasing Association River Lodge Badminton Court Amersham Bucks HP7 0DD Email: info@bvrla.co.uk
Disabled Persons Transport Committee Department of Transport 1/14 Great Minister House 76 Marsham Street London Email: admin@ddtgroup.com	Driver and Vehicle Licensing Agency DVLA Press Office Longview Road Morrision Swansea SA6 7JL
Driving Standards Agency Department for Transport Great Minister House 33 Horseferry Road London SW1P 4DR Email: customer.services@dsa.gsi.gov.uk	European Transport Safety Council 20 Av des Celtes B1040 Brussels
Health and Safety Executive (HSE) Redgrave Court Merton Road Bootl Merseyside L20 7HS	Institute of Advanced Motorist (IAM) Trust The Chair 510 Chiswick High Street London W45RG Email: press.office@iam.org.uk
Institute of Highways and Transportation 119 Britannia Walk London N1 7JE Email: info@ciht.org.uk	Institute of Road Safety Officers 12 Haddon Close Wellingborough Northamptonshire NN8 5ZB Email: irso@live.co.uk

Summary of Consultation Responses

Intelligent Transport Systems UK (ITS) Suite 312 Tower Bridge Business Centre 46-48 East Smithfield London E1W 1AW	Parliamentary Advisory Council for Transport Safety (PACTS) Clutha House 10 Storey's Gate London SW1P 3AY Email: admin@pacts.org.uk
RAC Motoring Services RAC House Brockhurst Crescent Walsall WS5 4AW	RAC Foundation 89- 91 Pall Mall London SW1Y 5HS Email: info@racfoundation.org
Road Haulage Association 35 Monument Hill Weybridge Surrey KT13 8RN	Road Haulage Association Roadhouse House Littlewood Drive West 26 Industrial Estate Cleckheaton West Yorkshire BD19 4TQ Email: n.dyer@rha.uk.net
Road Safe 71 Great Peter Street London SW1P 2BN Email: info@roadsafe.com	Royal Society for Prevention of Accidents (RoSPA) RoSPA House 28 Calthorpe Road Edgbaston Birmingham B15 1RP Email: help@rospa.com
Vehicle Recovery Operators	
Association of Vehicle Recovery Operators (AVRO) Euston Tower 286 Euston Road London NW1 3AT Email: sara.needham@btconnect.com	Britannia Rescue Freepost RSJA-XLCX-BLCE Folly Hall Mills St Thomas Road Huddersfield HD1 3LT Email: member.services@britanniarescue.com
GEM Motoring Assistance Station Road Forest Row East Sussex RH18 5EN	Green Flag The Wharf Neville Street Leeds LS1 4AZ Email: member-queries@greenflag.com

Summary of Consultation Responses

Road Rescue Recovery Association Hubberts Bridge Road Kirton Holme Boston Lincolnshire PE20 1TW Email: enquiries@rrra-recovery.co.uk	Institute of Vehicle Recovery Bignell House Horton Road West Drayton Middlesex UB7 8EJ Email: sara@avrouk.com
Business Organisations	
Association of British Certification Bodies Trevor Nash Chief Executive PO Box 836 Bedford MK45 9DR Email: trevor.nash@abcb.co.uk	Eddie Stobart Ltd Watling Street Kilsby Warwickshire CV23 8YE Email: routhwaitej@eddiestobart.co.uk
Freight Transport Association Hermes House St John's Road Tunbridge Wells Kent TN4 9UZ	GIST Rosewood Crockford Lane Chineham Business Park Basingstoke Hampshire RG24 8UB
Institute of Civil Engineers 1 Great George Street Westminster London Email: secretariat@ice.org.uk	London Assembly City Hall The Queen's Walk More London London SE1 2AA
London Development Agency (LDA) Public Liaison Unit London Development Agency Palestra 197 Blackfriars Road London SE1 8AA	Motor Insurers Bureau Linford Wood House 6-12 Capital Drive Linford Wood Milton Keynes MK14 6XT
National Express Ltd 51 Bordesley Green Bordesley Birmingham B9 4BZ Email: Mark.Hollis@nationalexpress.com	South East England Regional Assembly 1st Floor Berkerley House Cross Lanes Guildford Surrey GU1 1RN

Summary of Consultation Responses

Thames Valley Economic Partnership Thames Valley Chamber of Commerce Group 467 Malton Avenue Slough Berkshire SL1 4QU Email: customerservice@tvchamber.co.uk	The Society of Motor Manufacturers and Traders Limited 71 Great Peter Street London SW1P 2BN
Thorpe Park Staines Road Chertsey Surrey KT16 8PN	Transport for London 4th Floor, ZoneY4 14 Pier Walk North Greenwich London SE10 0ES