

Adran yr Economi a'r Seilwaith
Department for Economy and Infrastructure



File Ref WG/REB/OBJ0270.15b – GWT/Webb

Llywodraeth Cymru
Welsh Government

Objection Ref OBJ0270

Response to Objector's Evidence: Michael Webb (Gwent Wildlife Trust)

1. GROUNDS FOR OBJECTION

1.1. Details

1.1.1. Michael Webb has submitted two objections both dated February 2017 in relation to the draft statutory Orders associated with the Welsh Government's proposals for the M4 Corridor around Newport. The first (OBJ0270 – 15A) has been responded to by the Welsh Government in March 2017. The issues raised in that statement focused on environmental and ecology matters. The issue raised (and already responded to) included:

- 1) the Welsh Government has failed to address cumulative impacts, because it has not addressed the full range, as set out in the European policy pursuant to the EIA Directive; and
- 2) even in those instances where it has addressed developments/allocations etc., it has relied on its own deficient "mitigation" in respect of the M4CAN to conclude that there would be no material cumulative impacts.

1.1.2. The Welsh Government understands Michael Webb's second statement (OBJ0270 – 15B) to be based on the following:

1. The Consultation Report pursuant to the Draft Orders application produced by the Welsh Government is deficient because it fails to refer to the majority of the Gwent Wildlife Trust's (and others') reasons for objection.
2. The Consultation Report pursuant to the Draft Orders application produced by the Welsh Government is deficient because where summaries exist of elements of Gwent Wildlife Trust's objection, they are inaccurate, trivialising and even sometimes factually incorrect.
3. The Consultation Report is deficient in the way in which it addresses the large number of legitimate objections lodged by people and communities throughout Wales and beyond with the assistance of Environmental Charities because the Welsh Government largely dismisses them either by considering them as forming one objection or by failing to notice that they include bespoke material.

2. REBUTTAL

2.1. Matthew Jones (Chief Witness)

2.1.1. Response to Points 1, 2 and 3:

1. The Welsh Government has not produced or published a Consultation Report pursuant to the M4 Corridor around Newport draft Orders, published in March 2016.
2. The Welsh Government has published Document 4.5.10 - Welsh Government M4 Corridor around Newport: The Plan, Consultation Participation Report and Appendices (July 2014). That report summarised the participation involved in the development and adoption of the Welsh Government's Plan for the M4 Corridor around Newport (July 2014). The Full Factual Report was published alongside that summary report, separately as Document 4.5.11.
3. As I set out in Section 3 of my evidence (WG1.1.1), taking the responses to the consultation into account, the Welsh Ministers decided to adopt the Plan for the M4 Corridor around Newport (Document 4.5.7) in July 2014. A revised TR111 Notice was published (Document 4.6.8) in July 2014 to protect a modified Preferred Route for a new section of motorway to the south of Newport.
4. As I set out in Section 5 of my evidence (WG1.1.1), following adoption of the strategic Plan, the Scheme has been developed through engagement, integration and collaboration with a wide range of stakeholders, including Natural Resources Wales, Newport, Monmouthshire and Cardiff councils, Cadw, individual landowners, Sustrans, local access groups, local business forums, individual businesses, local schools, Statutory Undertakers including ABP, Newport Harbour Commissioners, the Design Commission for Wales, environmental charities, local residents and the public.
5. In addition, as explained in the Proof of Evidence of Dr Peter Ireland (WG 1.7.1), since March 2015 numerous meetings have been held on a one-to-one basis with those statutory consultees with a responsibility for the environment.

6. Publication of the draft Orders and Environmental Statement provided the opportunity for any person or organisation to object, support, or suggest alternatives to the Scheme or comment on the Environmental Statement.
 7. In Section 22 of my evidence (WG1.1.1) I explain the statements of support and objection that was received at January 2017. As I explain in paragraph 22.13-14 of my evidence, the Welsh Government has taken into account all objections and has provided a notification of receipt, and later a full reply to their points raised in a Welsh Government signed letter. Written responses provided clarification of any matters if needed, and/or set out the Welsh Government's position on their points raised. Copies of letters of support and objections have been made available to the Inspectors and will be available for all to view as part of the Inquiry Library.
 8. During the Public Local Inquiry there have been some developments and, in the Proofs of Evidence of the Welsh Government's Expert Witnesses, issues raised in objections have been dealt with on a topic by topic basis, in addition to responses to Inquiry Questions and Documents, as necessary. Rebuttals have also been submitted to those individuals and organisations that submitted evidence to the Inquiry. All inquiry documents are available on the Inquiry Website: <http://m4-newport.persona-pi.com/inquiry-documents>.
- 2.1.2. I confirm that the statement of truth and professional obligations to the inquiry from my main proof still applies.