

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



Llywodraeth Cymru
Welsh Government

Objection Ref OBJ6914

File Ref WG/REB/OBJ6914 – Robertson

Response to Objector's Evidence: John Robertson

1. GROUNDS FOR OBJECTION

1.1. Details

1.1.1. John Robertson has submitted a Statement of Evidence in relation to the draft statutory Orders associated with the Welsh Government's proposals for the M4 Corridor around Newport, which has been received via the Programme Officer.

1.1.2. The Welsh Government understands the evidence submitted within their Statement to be based on the following:

1. The Scheme will destroy the SSSIs on the Gwent Levels, and the habitat for many species.
2. The Scheme will impact newly established common cranes which have bred on the Levels for the first time in 400 years.
3. Suggests spending money on improvements to rail and subsidies for rail freight.

2. REBUTTAL

2.1. Points Raised

2.1.1. Some of the above points have already been addressed in previous proofs of evidence. Others are dealt with by topic by the relevant witness in the following sections, in addition to their general proofs of evidence, to which readers should also make reference in their entirety for a full understanding of the Welsh Government's case. For ease of reference the places where the above points are addressed in this Rebuttal are listed in the table below:

| Objector's point reference | Rebuttal paragraph reference | Objector's point reference | Rebuttal paragraph reference |
|----------------------------|------------------------------|----------------------------|------------------------------|
| 1 | 2.1.2 | 3 | 2.1.2 |
| 2 | 2.2.1 | | |

2.1.2. Some of the Objector's points have already been covered in previous correspondence and proofs of evidence as follows:

1. **Point 1** (The Scheme will destroy the SSSIs on the Gwent Levels, and the habitat for many species) / The effect of building and operating the new section of motorway on the environment is set out in the Environmental Statement (Document 2.3.2) and its Supplements (Documents 2.4.4, 2.4.14, 2.5.1 and 2.6.1). The Environmental Statement clearly identifies the magnitude and significance of effects on a wide range of environmental features and assets.
2. **Point 3** (Suggests spending money on improvements to rail and subsidies for rail freight) / The issue of how the Welsh Government spends money is outside the scope of this Public Local Inquiry. However for this project, we have fully taken account of the planned mainline rail electrification and the committed elements of Cardiff Metro in our core scenario, and have carried out a sensitivity test on a higher level of Metro investment and Newport Rapid Transport. The results show that the combined effect of these public transport schemes is to reduce M4 traffic by a maximum of 6% and therefore does not resolve the problems on the M4. This does not mean to say that development of an efficient public transport system is not valid. Public transport should be seen as complementary to the M4 proposal and not in competition with it, as is explained further in the

evidence of Matthew Jones in section 9 of WG1.1.1 in Public Inquiry Document ID/073 – Public Transport Note.

2.1.3. Point 2 is responded to by specialist expert witness Simon Zisman in the section following.

2.2. Simon Zisman (Ornithology)

2.2.1. Response to **Point 2** (The Scheme will impact newly established common cranes which have bred on the Levels for the first time in 400 years):

1. The impact of land take and operation on the 2016 common crane nesting area is considered in the December 2016 Environmental Statement (ES) Supplement (Doc. 2.4.14), at paragraphs 4.4.12 to 4.4.18, with the residual impact of land take assessed identified as Moderate or Large adverse, and therefore significant in EIA terms.
2. The creation of alternative nesting and foraging habitat has therefore been considered in the Draft SSSI Mitigation Strategy (Appendix SR10.35 of the December 2016 ES Supplement (Document 2.4.14)). Specifically, the creation of an alternative nesting pool and associated habitat has been proposed at Caldicot Moor.
3. Following subsequent consideration of RSPB's Written Response of 7 February 2017, investigations and liaison is continuing in order to refine the habitat creation proposals for cranes at Caldicot Moor. The purpose of this is to continue to explore further the ways in which the likelihood of colonisation of this area can be maximised.

2.2.2. I confirm that the statement of truth and professional obligations to the inquiry from my main proof still applies.