

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



Objection Ref OBJ0013

File Ref WG/REB/OBJ0013 - Branscombe

Llywodraeth Cymru
Welsh Government

Response to Objector's Evidence: Julian Branscombe

1. GROUNDS FOR OBJECTION

1.1. Details

1.1.1. Julian Branscombe has submitted objections dated 10 March 2016 and 1 May 2016 in relation to the draft statutory Orders associated with the Welsh Government's proposals for the M4 Corridor around Newport, which have been responded to in Welsh Government correspondence dated 11 July 2016. The issues raised in the objections and responded to involved:

- 1) Impact on (nationally important) wildlife-rich local environment;
- 2) Impact on the global environment by further tying Wales into a high CO2 emissions model of economic and social development;
- 3) Available cheaper and lower impact alternatives;
- 4) Lack of commitment to sustainable development;
- 5) Impact on historic heritage; and
- 6) Flooding.

1.1.2. Julian Branscombe has also submitted an objection to the Objectors' Suggested Alternatives (Documents 4.7.1-2) dated 10 May 2017. That submission goes beyond objecting to the objector's suggested alternatives and objects to issues related to the Scheme. The Welsh Government understands the objection to be based on the following:

1. The Welsh Government's objectives for transport should be about ensuring reasonable access to services for all, whilst minimising impact on important environmental assets or on the health and quality of life of all of Wales' citizens.
2. The alternatives to the M4 Scheme should include an objective assessment of the current situation, so a "do nothing" can be assessed.
3. The alternatives to the M4 Scheme should review further measures to reduce accidents and regulate speed and traffic flows on the M4 corridor, and assessments of the various public transport possibilities. The Welsh Government should have invested first in looking at the sustainable alternatives properly.

4. The Welsh Government should not rely on simplistic economic modelling which fails to value the contribution that the natural environment makes to us all.
5. Spending over £1bn gives a huge signal to businesses and households that roads are what the Welsh Government expect people to use now and into the future, which also diverts money that should be spent on public transport.
6. By providing the extra road space, this will encourage many more journeys onto the roads, giving a significant level of traffic generation.
7. The Welsh Government has under-estimated the traffic levels likely to be generated and has not factored this into its assessment of climate change.
8. The Scheme would seriously affect the Gwent Levels SSSIs through land take, wildlife road kill, habitat fragmentation and inevitable pollution.
9. Suggested alternatives should include the Metro, public transport investment, traffic management and junction closures or restrictions.

2. REBUTTAL

2.1. Points Raised

2.1.1. Some of the above points have already been addressed in 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	2.2.1	5	2.2.4
2	2.2.2	6	2.2.5
3	2.2.2	7	2.2.5
4	2.2.3	8	2.2.6
		9	2.2.2

2.2. Matthew Jones (Chief Witness)

2.2.1. Response to **Point 1** (The Welsh Government's objectives for transport should be about ensuring reasonable access to services for all, whilst minimising impact on important environmental assets or on the health and quality of life of all of Wales' citizens):

1. Section 3 of my evidence (WG1.1.1) explains the background to the Scheme development, including identifying objectives, appraising options and adopting the Plan (Document 4.5.7) and modifying the preferred route (Documents 4.6-) prior to the publication of draft Orders (Documents 2-), to which you object. I explain that since the early 1990s, numerous assessments and consultations have been undertaken to develop a solution to the transport related problems associated with the M4 around Newport.
2. Section 10 of my evidence (WG1.1.1) explains how as part of the background to the development of the Scheme, objectives were identified and agreed. In summary, the Welsh Government has looked in detail at what travel related problems are associated with the M4 around Newport, and asked the public, other stakeholders and those involved in managing

transport in and around Newport what they considered the problems to be. This process identified 17 problems, relating to capacity, resilience, safety and sustainable development issues. Then 15 transport planning objectives were identified and agreed with the public and other stakeholders. Welsh Government gives these objectives equal weighting and they are not ranked. They are wide ranging and of particular relevance to your objection, include:

- Easier access to local key services and residential and commercial centres;
 - Improved air quality in areas next to the M4 around Newport;
 - Reduced disturbance to people from high noise levels, from all transport modes and traffic within the M4 Corridor; and
 - Reduced greenhouse gas emissions per vehicle and/or person kilometre.
 - A cultural shift in travel behaviour towards more sustainable choices.
3. Framing those problems and objectives are the Welsh Government's aims for the Scheme as adopted in the Plan (Document 4.5.7). The aims include:
- a) Make it easier and safer for people to access their homes, workplaces and services by walking, cycling, public transport or road;
 - b) Deliver a more efficient and sustainable transport network supporting and encouraging long-term prosperity in the region, across Wales, and enabling access to international markets; and
 - c) To produce positive effects overall on people and the environment, making a positive contribution to the over-arching Welsh Government goals to reduce greenhouse gas emissions and to making Wales more resilient to the effects of climate change.
4. The history of the identification, consultation, review and assessment of the Scheme against the problems, aims and objectives is set out within the various Welsh Transport Planning and Appraisal Guidance (WelTAG) appraisals for the Scheme, its Plan and previous development work (Documents 4.3.15, 4.3.17, 4.4.12, 4.5.5). That work showed that the

Scheme would best address the identified problems and achieve the objectives.

5. As I set out in my evidence (WG1.1.1) at paragraph 24.3: the Scheme is in accordance with the Welsh Government's priorities for transport. It would improve accessibility for people as well as Welsh goods and services to domestic and international markets. It would increase accessibility by improving both journey times and journey time reliability and improving access to key residential and employment sites. In collaboration with our proposals for the Metro, the Welsh Government is seeking to develop a long-term, sustainable and integrated transport system for Wales.

2.2.2. Response to **Points 2, 3 and 9** (The alternatives to the M4 Scheme should include an objective assessment of the current situation, so a "do nothing" can be assessed), (The alternatives to the M4 Scheme should review further measures to reduce accidents and regulate speed and traffic flows on the M4 corridor, and assessments of the various public transport possibilities. The Welsh Government should have invested first in looking at the sustainable alternatives properly) and (Suggested alternatives should include the Metro, public transport investment, traffic management and junction closures or restrictions):

1. As set out in section 3 of my evidence (WG1.1.1), numerous assessments and consultations have been undertaken since the early 1990s to develop a solution to the transport related problems associated with the M4 around Newport.
2. As part of the M4 CEM Programme, a comprehensive engagement process was launched in September 2010 culminating in a public consultation being held on different options and their associated transport, health, equality and environmental assessments, between March and July 2012 (Document 4.3.7). During this period more than 100 possible measures were considered including network improvements, travel planning, demand management and alternative modes of transport. The M4 CEM Programme considered public transport investment, traffic management and junction closures and restrictions (see www.m4cem.com).

3. Various WelTAG appraisals (Documents 4.3.15, 4.3.17, 4.4.12, 4.5.5) have considered a wide range of options against a do-minimum (doing nothing above what is already planned or committed) scenario, which has been subject to detailed appraisal.
4. Taking into account all of the development work, the Welsh Ministers have determined that a new section of dual 3-lane motorway to the south of Newport, in addition to complementary measures, should be progressed (Document 4.3.17) as the sustainable, long term solution that would address the problems.
5. Public transport improvements and the Metro are considered in section 9 of my evidence (WG1.1.1).
6. In paragraph 9.1 I explain that as set out within Chapter 4 of the M4 Corridor around Newport Environmental Statement (Document 2.3.2); public transport studies have shown that new or improved public transport services would only have minimal impact in terms of reducing traffic on the M4. Around the time of the M4 Corridor around Newport Strategic Environmental Assessment in 2013, a public transport appraisal (Document 4.3.16) considered a wide range of possible public transport and Metro measures that had potential to relieve M4 motorway traffic. The appraisal showed around 3% of motorway traffic would transfer, and that even a doubling of public transport usage in the Newport area would only achieve up to a 5% reduction in motorway traffic. This analysis informed Welsh Government decision making to adopt its strategic Plan for the M4 Corridor around Newport in July 2014.
7. I explain in paragraph 9.2 that in combination with the Scheme, the Welsh Government is progressing with a Cardiff Capital Region Metro (Documents 6.1.6, 6.3.4 and 6.3.6). This investment in public transport measures achieves wider benefits for the region than relieving motorway traffic.
8. Suggested alternatives are considered in section 23 of my evidence (WG1.1.1) and appraisals have been published (Documents 4.7.1-2) The Objector's suggested alternatives have been subjected to consideration at the Public Local Inquiry by the independent inspectors.

2.2.3. Response to **Point 4** (The Welsh Government should not rely on simplistic economic modelling which fails to value the contribution that the natural environment makes to us all):

1. Detailed economic modelling has been undertaken in accordance with UK guidance. The method and results of assessment are presented in the evidence of Stephen Bussell (WG1.3).
2. As stated in Stephen Bussell's main evidence (WG1.3.1), the economic appraisal of the Scheme is a quantitative assessment of value for money. Because the economic appraisal is a quantitative assessment the analysis is focussed on, but not limited to, impacts on the economic efficiency of the transport sector. There may be other costs and benefits that cannot be quantified in monetary terms. Therefore, the economic appraisal is only one aspect of the overall case for investment and needs to be balanced against other environmental and social costs and benefits.
3. That the economic appraisal is focussed on those impacts that can be monetised does not mean that environmental and social impacts have not been taken into account in the decision-making process. The economic appraisal sits alongside the Environmental Statement (and its Supplements) for the Scheme (Documents 2.3.2, 2.4.4, 2.4.14, 2.5.1, 2.6.1, 2.8.6). It does not seek to summarise the Environmental Statement nor attempt to equate the various impacts to the monetised economic appraisal.
4. To the extent that they exist, methodologies for the valuation of environmental assets or ecosystem services are not sufficiently well developed to take account of the complex environmental aspects of the Scheme. In any case, the Welsh Government has instructed the preparation of a bespoke ecosystems services assessment using current guidance. This will be provided to the Inquiry in due course, at which time the Welsh Government's evidence can be updated if necessary.

2.2.4. Response to **Point 5** (Spending over £1bn gives a huge signal to businesses and households that roads are what the Welsh Government expect people to use now and into the future, which also diverts money that should be spent on public transport):

1. For many years, traffic congestion has been a common occurrence for those using the existing M4 around Newport and living in the area. The need for a solution to the identified transport related problems on the M4 around Newport is clear. Assessments have shown that the Scheme is the long term, sustainable solution to the serious problems experienced on the M4 around Newport. In collaboration with our proposals for a South Wales Metro, it forms a vital part of our vision for an efficient and integrated transport network for Wales.
2. Such contentions about how money should be spent are beyond the scope of this Inquiry. It is for the Welsh Ministers to decide how to allocate Welsh Government resources, both geographically and in respect of the services it provides. In any case, the Welsh Government is investing in both the Scheme and Metro as set out above.

2.2.5. Response to **Points 6 and 7** (By providing the extra road space, this will encourage many more journeys onto the roads, giving a significant level of traffic generation) and (The Welsh Government has under-estimated the traffic levels likely to be generated and has not factored this into its assessment of climate change):

1. The evidence presented to the Inquiry by Mr Bryan Whittaker on additional traffic, often referred to as 'induced' traffic has been substantial. As set out in his evidence (WG1.2.6) at paragraph 16.8, he explains that the Scheme's transport model directly takes into account the effect of 'induced' traffic. Public Inquiry Document ID 043 quantifies the scale of induced traffic projected to occur across various scenarios.
2. ID 043 outlines that the induced traffic across the Usk screenline has been forecast to be 4.2% in the Scheme's Core Scenario over an average day in 2037.
3. The carbon assessment takes into account the transport model results including induced traffic. The assessment and its results are covered in the evidence of Mr Tim Chapman (WG 1.13.1 to 1.13.4).

4. I explain in my evidence (WG1.1.1) that carbon emissions, as a result of both construction and the future operation of the highway network with and without the Scheme in place have been carefully considered in the context of relevant policy and legislative requirements. As set out in the published Carbon Report within the Environmental Statement (Document 2.3.2), the emissions estimated for the construction of the Scheme are a small fraction (1%) of the total emissions associated with the South Wales highway network by 2037, including those of vehicles using it.
5. At paragraph 15.3 of my evidence (WG1.1.1) I explain that whilst there would be increased levels of traffic on the network at that time the reduction of stop-start traffic conditions as well as reduced journey lengths on the new section of motorway, would make those trips more efficient.
6. Mr Tim Chapman explains in his evidence WG1.13.4 that having regard to the net annual carbon savings (user savings less operational carbon cost) the capital carbon incurred during construction, 2018 to 2022, would be repaid in 2072. Mr Tim Chapman goes on to explain that his calculation does not take into account the impact of the Scheme on user carbon on the wider South Wales road network. His assessment suggests that there would be further user carbon savings beyond the existing M4 and the new M4 both in the opening year and the design year of 2037. The carbon neutrality extrapolation ignores these savings and is, in this regard, conservative.
7. The evidence of Mr John Davies (WG1.23.1) further considers climate change and greenhouse gases in his paragraphs 49 to 55. He considers the Scheme to be in line with the Welsh Government's approach to greenhouse gas emissions reductions by virtue of its design and the fact that it would achieve a reduction, albeit small, in annual user carbon emissions both in the opening and design years.
8. When taking into account the induced traffic and carbon assessment, the Scheme is in accordance with the trajectory of overall emissions reductions required by legislation and policy.

2.2.6. Response to **Point 8** (The Scheme would seriously affect the Gwent Levels SSSIs through land take, wildlife road kill, habitat fragmentation and inevitable pollution).

1. As I set out in section 14 of my evidence (WG1.1.1), particular consideration has been given to potential impacts on the Gwent Levels Sites of Special Scientific Interest (SSSIs).
2. Section 4.9 of Dr Keith Jones' evidence (WG1.18.1) is dedicated to describing and considering the likely effects on the Gwent Levels, including mitigation measures. Section 8 of Dr Keith Jones' evidence (WG1.18.1) concludes that the land take for the Scheme would have significant effects on the Gwent Levels SSSIs. His evidence goes on to explain the mitigation measures proposed and confirms that by selecting a route and making highway design choices that would minimise the effect on the SSSIs, and developing a comprehensive SSSI mitigation strategy, the Welsh Government has sought to maintain and enhance biodiversity insofar as that is consistent with the proper exercise of its functions regarding the motorway network
3. The Proof of Evidence of John Davies MBE (WG 1.23.1) sets out how the Welsh Government has taken reasonable steps (consistent with the proper exercise of its functions as required by Section 28G of the Wildlife and Countryside Act 1981) to seek to maintain and enhance the features by reason of which the SSSIs are of special interest and to maintain and enhance biodiversity in the exercise of its functions (as required by Section 6 of the Environment (Wales) Act) given that the route requiring land within the Gwent Levels is the only reasonable one that would meet the objectives and relieve the problems on the M4 around Newport.

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