

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



Llywodraeth Cymru
Welsh Government

Objection Ref OBJ0026

File Ref OBJ0026/REB/WG – Simon Turl

Response to Objector's Evidence: Simon Turl

(Chief Executive Officer Roadchef)

1. GROUNDS FOR OBJECTION

1.1 Details

1.1.1 Simon Turl has submitted a Statement of Evidence dated 7 February 2017 in relation to the draft statutory Orders associated with the Welsh Government's proposals for the M4 Corridor around Newport. On the 26 June 2017 Simon Turn submitted a Supplemental Proof of Evidence. Both of these documents were received via the Programme Officer.

1.1.2 The Welsh Government understands the evidence submitted within both the documents to be based on the following:

Proof of Evidence

1.1.3 To the extent that points made in the Poof of Evidence have been superseded by the Supplemental Proof or are repeated in the Supplemental Proof they are not separately identified below.

- 1 The proposed access arrangements for M4 road users contained within the WG Scheme, involving a diversion of at least 4.2 miles to use the Magor MSA, are impractical and dangerously at odds with good practice in safe motorway design.
- 2 Removing proper access to adequate rest area provision from the M4 in this way is in our opinion, and in the opinion of leading road user and road safety organisations, a major error and will undoubtedly lead to a significant risk of additional road accidents due to driver fatigue. Motorway design should encourage and not actively discourage road users from taking regular rest breaks when undertaking long journeys on the motorway network.
- 3 The Road Haulage Association Ltd (RHA) is a British trade association, which represents members of the road haulage industry, together with allied businesses. The RHA has been in existence for more than fifty years. As a trade association, the RHA provides campaigning, advice, information and business services for its members within the UK haulage industry, including

audits, risk assessments and contracts of employment. It also offers training, from Digital Tachograph training to Safe Loading.

“Road haulage is vital to the whole economy and the motorway network is its major place of work. The Road Haulage Association has stressed that lorry parking facilities are an essential element of the network, and that it is the responsibility of infrastructure providers to ensure that they are provided in the interests of road safety and of driver welfare. The RHA and our members would be extremely concerned about any plans to reduce access to, or completely to remove any MSA facilities from the UK motorway network

Supplemental Proof of Evidence

- 4 Despite the recent inclusion of a more direct Eastbound off-slip to access the Magor MSA there has been no corresponding improvement to the equally complex, counter intuitive and inadequate egress for Westbound traffic returning to the new M4 which represents a higher volume of current users of the Magor MSA.
- 5 Whilst the inclusion of a more direct Eastbound access to the Magor MSA will lessen the catastrophic economic impact to the business and its employees, the absence of a similar solution for Westbound egress from the MSA will severely impact the profitability of the site, have a major impact on its employees and will effectively remove the MSA from the M4 for Westbound traffic.
- 6 The effect of Welsh Government’s new proposal, including a direct Eastbound off slip and return via the convoluted new junction 23 with its traffic light controlled “Hamburger” turn for Eastbound MSA visitors re-joining the WG Scheme route to London, Roadchef estimates would lead to a 25% reduction in visitor numbers

Eastbound, but that 80% of the estimated 53% of users travelling Westbound would no longer utilise the Magor MSA.

- 7 The inclusion of an improved access to the Magor MSA from the new Newport bypass section of the M4 will lessen the negative impact on visitor numbers to the site. However, even with the new off-slip, the route for traffic travelling Eastbound will still involve the following additions in comparison to the current arrangements:

Access:

- Exit the new M4 via a motorway off-slip which is intended to include a pedestrian pelican crossing.
- Navigation of an additional roundabout.
- Use of a short section of local road to access the current Junc 23a roundabout.

Egress:

- Exit the MSA and drive for approx. 3.3km (2 miles) in an Easterly direction on the re-classified existing M4.
- Navigation of the convoluted new Junc 23 with its traffic light controlled “Hamburger” turn.

- 8 It has been suggested that there are numerous routes by which Westbound traffic could re-join the new M4 after visiting the Magor MSA. Bryan Whittaker in his updated evidence (11.3.7) has noted that the fastest route would be for traffic to continue 20.6km (13 Miles) along the re-classified old M4 through the Brynglas Tunnels. Long haul traffic will not make this type of diversion off a brand new motorway to use an MSA.
- 9 In meetings with Welsh Government it has been confirmed that it is their intention to direct Westbound traffic that has used the Magor MSA to re-join the new M4 by way of the new Junction 23.
- 10 In addition to the increased journey time the route to and especially from the Magor MSA back to the new Newport bypass section of

the M4 would become dramatically more complex, counter intuitive and inadequate than it is today.

Access:

- Exit the new M4 via an off slip onto the re-classified existing M4.
- Drive for 2 miles along the re-classified existing M4.
- Exit the re-classified M4 and navigate the existing Junc 23a roundabout.

Egress:

- Exit the MSA and drive for approx. 3.3km (2 miles) in an Easterly direction ie in the opposite direction to the journey the road user is making.
- Perform a U-Turn via the new Junc 23 roundabout to re-join the new M4 in a Westerly direction.

- 11 Whilst it may be anticipated that users of the M4 in Wales would simply switch to using other existing service areas on their route it should be noted that Cardiff Gate, the next service area in a westerly direction, is too far and too small to satisfy the safety needs of M4 travellers in the absence of the Magor MSA. The site is around 50% smaller than Magor, is already heavily used and has no space for expansion.
- 12 The absence of a proper MSA facility with simple and convenient access to the new M4 for 49 miles will directly impact and inconvenience around 1m regular Westbound users of the Magor MSA. The effective removal of the site for the M4 in a Westerly direction will disproportionately inconvenience the elderly, families with young children and the disabled who need even more regular access to toilet facilities on a long journey.
- 13 Unfortunately, and inexplicably having accepted that the Eastbound access was inadequate Welsh Government will not accept that the proposed Westbound access which is every bit

as complex, counter intuitive and inadequate should not also be replaced with a direct return from the MSA to the new M4.

- 14 The proposed westbound access arrangements for users of the new road to visit the Magor MSA under the new Welsh Government scheme are impractical and will result in its effective removal from the Westbound motorway it was in part constructed to serve. The safety implications of such an error by the Welsh Government would be huge.
- 15 The scheme will reduce turnover at the Services by 54%, will lead to the loss of 60 permanent jobs, 15 seasonal jobs and will mean that 25 new jobs which would otherwise would be generated will not arise

2. WELSH GOVERNMENT'S VIEW

2.1. Points Raised

2.1.1. Some of the Objector's points have already been covered in previous correspondence and 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. The evidence relating to the economic, commercial and employment impact of the Scheme (point 15) is addressed in the separate rebuttal of Mr Stephen Bussell who also addresses point 5. 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	2.3.1	8	2.3.3
2	2.3.2	9	2.2.1
3	2.3.2	10	2.3.3
4	2.3.3	11	2.3.3
5	2.3.3	12	2.3.3
6	2.3.3	13	2.3.3
7	2.3.3	14	2.3.1

2.2. Matthew Jones (Chief Witness)

2.2.1 Response to **Point 9** (In meetings with Welsh Government it has been confirmed that it is their intention to direct Westbound traffic that has used the Magor MSA to re-join the new M4 by way of the new Junction 23.

1. Mr Turl's understanding is not correct. In meetings WG has agreed to consider Roadchef's requests to sign via J23 but have not confirmed that WG would accede to this request (see correspondence from Roadchef's solicitor of 8 June 2017 and the response from Martin Bates of WG dated 9 June 2017). WG will continue to discuss this matter with Roadchef.

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

2.3. Ben Sibert (Engineering)

2.3.1 Response to **Points 1 & 14**: (The proposed access arrangements for M4 road users contained within the WG Scheme, involving a diversion of at least 4.2 miles to use the Magor MSA, are impractical and dangerously at odds with good practice in safe motorway design)

1. Whilst Mr Turl provides some comment on road safety, the principle points of evidence provided by Roadchef in respect of road safety are given by Mr. Axon. I will thus provide rebuttal evidence on matters of road safety corresponding with Mr Axon's evidence later in the Inquiry.

2.3.2 Response to **Points 2 & 3**: (Removing proper access to adequate rest area provision from the M4 in this way is in our opinion, and in the opinion of leading road user and road safety organisations, a major error and will undoubtedly lead to a significant risk of additional road accidents due to driver fatigue. Motorway design should encourage and not actively discourage road users from taking regular rest breaks when undertaking long journeys on the motorway network.)

1. The Welsh Government will respond on the matter of the opinion of leading road user and road safety organisations following receipt of correspondence from these organisations from Roadchef, which has been requested.

2.3.3 Response to **Points 4, 5, 6, 7, 8, 10, 11 12 & 13**: (Despite the recent inclusion of a more direct eastbound off-slip to access the Magor MSA there has been no corresponding improvement to the equally complex, counter intuitive and inadequate egress for Westbound traffic returning to the new M4 which represents a higher volume of current users of the Magor MSA.)

- 1 Mr Turl states in paragraphs 1.5 and 5.4 of his evidence that the egress for westbound traffic from Magor services would be 'complex, counterintuitive and inadequate'. At paragraph 2.14, he additionally states that it would be dramatically more complex.
- 2 As clarified in my supplementary evidence (Doc. 1.5.5) sections 3.2.12 and 3.2.13, and as described above in respect of signing, there are three possible westbound egress routes from the Magor services. To describe

the route via the reclassified M4 as 'dramatically more complex' is clearly incorrect since it would be identical to the current west bound egress.

- 3 To describe the egress from the Magor service as 'inadequate' is clearly incorrect because all potential directions and journeys can be accommodated by the proposed layout, which also negates his statement at section 4.2 of his evidence, that there would be an '...absence of a proper MSA facility with simple and convenient access to the M4 for 49 miles..'.
 - 4 In Section 2.14 of Mr Turl's evidence he presents some journey distances regarding the westbound traveller routes. For accuracy of the record, the two distances quoted here are greater than measured from the Scheme drawings. For the access to the rest area, the quoted distance of 2 miles travelled along the reclassified M4 is incorrect. This distance, as he describes it between the merge of the west bound free flow link and the diverge of the junction 23A slip road, is approximately 1300m or $\frac{3}{4}$ of a mile, measured between the central part of the merge/diverge tapers. The distance he quotes of 3.3km (2 miles) from the MSA to junction 23 is also incorrect. This distance from the extents of each roundabout gyratory is approximately 2700m (1.6 miles).
 - 5 Regarding Mr Turl's statement that there would be a gap of 49 miles between Leigh Delamere and Cardiff Gate services, apart from disagreeing with this assertion, the distance he quotes is incorrect. With the proposed new motorway in place, the distance would be 47 miles due to the shorter length of the proposed new motorway compared to the existing route. The route is also a shorter journey time by several minutes as indicated in the evidence of Mr Whittaker (Doc. 1.2.1 Rev A Table 11.1).
 - 6 I provide further evidence on the distances associated with access and egress to and from the rest area in Appendix A to my supplementary evidence (Doc. 1.5.5).
- 2.3.4 Response to **Point 9** (In meetings with Welsh Government it has been confirmed that it is their intention to direct westbound traffic that has used the Magor MSA to re-join the new M4 by way of the new Junction 23. It is

this route that I understand would be signposted and therefore I have focussed on this option.

- 1 At paragraph 2.10 of his evidence, Mr Turl incorrectly indicates that the Welsh Government would sign traffic to rejoin the motorway for westbound traffic via junction 23. This is not the case.
- 2 As indicated in my supplementary evidence (Doc. 1.5.5) at sections 3.2.12 and 3.2.13, it would not be logical to sign all traffic in this direction.
- 3 The traffic sign face design for the Scheme is a detailed design activity. The principles of the traffic sign layout should be to inform drivers which direction to take, to facilitate their preferences and not to preclude unusual movements. Should the only signed option for the egress from the Magor services for drivers travelling west be to send them to junction 23, then whilst this might be attractive for some, it would likely be opposite to the recommendations of satellite navigation devices, which would likely direct the quickest journey via the reclassified M4. Conversely, to sign all movements along the reclassified M4 would potentially cause confusion for drivers wishing to exit the proposed new motorway at Docks Way Junction for southern Newport. The traffic sign strategy and sign face design would need to respond to these factors and provide both clarity and flexibility for different road user preferences. The strategy and design would need to consider the holistic approach throughout the network including considerations for J23 and the strategic junction 24 for connections to the Midlands and the Heads of the Valleys.
- 4 For westbound traffic exiting the motorway and wishing to travel further west than Newport, the logical route would be via the reclassified M4, since it is the quickest and does not require doubling back on one's journey. The traffic sign strategy would thus likely direct M4 westbound traffic in this way.

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

Annex- correspondence list

Date	In/Out	Author	Email/Letter/Meeting
8 June 2017	In	Roadchef Solicitor	Letter
9 June 2017	Out	The Welsh Government	Letter (excluding appendices)

Date: 8 June 2017
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By e-mail only

Dear Mr Bates

M4 Corridor around Newport ("the Scheme")

Welsh Government's proposal for the inquiry process going forward

Thank you for your letter dated 2 June 2017 responding to various correspondence on behalf of Roadchef and covering a range of matters in connection with the inquiry concerning the Scheme.

We note your confirmation that the Welsh Government is now promoting the Scheme with the eastbound offslip and that all of its evidence relating to the version of Scheme without the eastbound offslip is duly withdrawn. We presume that you will be formally announcing this when the inquiry reconvenes next week in order to inform the Inspectors, other parties to the inquiry, and the wider public accordingly, but would be grateful for your clarification of this.

This letter focuses on your proposal as to how the inquiry process should go forward in light of your confirmation that the Scheme before the inquiry has now changed (and that your evidence is about to change as a consequence). This is particularly urgent in view of the fact that the first of Roadchef's witnesses, Simon Turl, is due to appear at the inquiry at the end of this month and the changes to the Scheme directly impact on Roadchef's evidence.

We appreciate that your proposed timetable is driven by the objective of keeping the inquiry on-programme and, in this regard, Roadchef has no desire to extend the inquiry unnecessarily. This is why we have repeatedly sought the above confirmation in various correspondence over a number of weeks. Indeed, given what you say in your letter concerning the way that the Objectors' Suggested Alternatives Report is drafted (that it has been prepared with reference to the Scheme with the addition of the eastbound off-slip because "*that is the scheme that the Welsh Government is now promoting*"), it is not clear to us why this confirmation could not have been provided much sooner than it has been.

Plainly there is very limited time for evidence to be updated if the inquiry programme remains as is and this is why you are proposing a very tight timetable following the circulation of the Welsh Government's updated evidence at the end of this week. However, in order to avoid both prejudice and wasted inquiry time, any proposal for updating evidence to reflect the changes to the Scheme

To: Mr Martin Bates
Date: 8 June 2017
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needs to be fair and workable to all parties, including any third parties who have already provided, or are about to provide, evidence to the inquiry based on the original version of the Scheme.

We obviously cannot speak for any third parties in this regard. However, from Roadchef's perspective, as indicated in my telephone conversations with your solicitor Charles Felgate on 6 and 7 June 2017, the proposed timetable set out in your letter - in particular the deadline of 16 June for Roadchef to circulate its updated evidence - is not workable for the following reasons:

- 1 One of Roadchef's witnesses (Mike Axon) is presently away on holiday until next week, which obviously conflicts with the suggested deadline for Roadchef's updated evidence to be circulated;
- 2 In any event, your letter indicates that further technical highways information is to be issued by the Welsh Government next week; since this could have a bearing on Roadchef's evidence, it does not make sense for the deadline for Roadchef's evidence to be during the same week; and
- 3 As set out below, there is certain other information that is still outstanding in addition to that referred to in your letter. Since this information could also have a bearing on Roadchef's evidence, this too needs to be made available before any updated evidence is due.

Whilst Mr Felgate has indicated to me that the information referred to in your letter could be provided this week rather than next week, there is other additional information that is still outstanding, as per point 3 above. This is as follows:

Outstanding Item	Date of Request
WG to confirm if an ES Assessment of the westbound off-slip has been undertaken	Meeting of 10 April
WG to provide a breakdown of traffic using the eastbound off-slip	Meeting of 10 April
WG to confirm the signage strategy for Magor MSA	Meeting of 10 April
WG noted in their letter dated 10th April that the eastbound off-slip had been amended since the CAD files of the layout were issued to Vectos. WG confirmed these were to be re-issued with the relevant licence agreements.	10 April
WG to issue the demand flows from the SATURN model	Vectos e-mail on 17th March
WG to confirm what modelling of the OA has been undertaken	Vectos e-mail on 17th March
WG to confirm level of trip suppression / trip induction at J23 and J23a	Vectos e-mail on 17th March
WG to confirm 10 separate demand segments for trips to and from Magor MSA	Vectos e-mail on 17th March
WG to confirm generalised cost of trips to and from Magor MSA by each of the available routes	Vectos e-mail on 17th March

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Additionally, we note that in your letter of 2 June you indicate that you will provide traffic flow diagrams, journey times and turning movements for Objectors Alternative 10. Is it possible to provide this information for Objectors Alternative 11?

We would be grateful for your confirmation as to when the additional information set out above can be provided, so that we can then agree an appropriate deadline for the provision of Roadchef's updated evidence thereafter. We look forward to hearing from you in this regard shortly.

We will revert to you separately on the other points in your letter.

Yours sincerely

Michael Dempsey



Llywodraeth Cymru
Welsh Government

Mr Michael Dempsey
Berwin Leighton Paisner
Adelaide House
London Bridge
London
EC4R 9HA

Your Ref: MDEM/27177.00072
Our Ref: qA1174612/OBJ0026
Date: 09 June 2017
By email only

Dear Mr Dempsey

M4 Corridor around Newport

1. Thank you for your letter dated 8 June 2017
2. We will formally confirm matters relating to the eastbound off-slip at an appropriate juncture in the inquiry.
3. You discuss the changes to the Scheme as if these were recent. That is not the case. We published the draft Supplementary Orders and Environmental Statement on 21 March 2017. This was announced at the inquiry and recorded as inquiry document ID020. We wrote to you on 10 April 2017 to formally advise you of this and confirm that the Scheme promoted by the Welsh Government included the eastbound off-slip. The letter dated 10 April 2017 also included a list of the relevant documents published, with tabulated PLI references and hyperlinks for convenience.
4. The information referred to in my letter of 2 June 2017 is listed below. The information is provided in Appendices to this letter or included overleaf.

Information description	Appendix
Detailed junction assessment outputs for J23 (LINSIG) and J23A (ARCADY) in the Do-Something Scenario.	Appendix A
The journey times from M48 Junction 2 (Chepstow) to M4 Junction 22 (Second Severn Crossing) using two different routes: <ul style="list-style-type: none">• Via J23A (extracted from forecast year 2037 Do Minimum and Do Something scenarios);• Via J23 (extracted from forecast year 2037 Do Something scenario only).	Appendix B
Equivalent data (traffic flow diagrams, journey times and turning movements) for Objectors' Alternative 10.	Appendix C

Information description	Response																		
Clarification of the query regarding the directional splits of trips entering Magor Services compared against those exiting the services.	<p>While, in reality, trips entering and leaving the services are linked, it is a misconception that these linkages can be replicated in the traffic model. Trip representation in the model cannot link the destination end of one trip to the origin end of another. It is not the case, therefore, that a significant proportion of traffic entering the services travels back in the direction it had entered from upon exiting, as there is no connection between entry and exit in the traffic model.</p> <p>The base model was validated to traffic counts undertaken in May 2014. For the turning count carried out at the J23A roundabout, the table below summarises the entry and exit traffic volumes between the services and the M4. Generally, this shows that, in both peak hours, traffic is quite evenly balanced between entry and exit volumes, and also between entry/exit from the west and the east.</p> <table border="1"> <thead> <tr> <th></th> <th></th> <th>Out</th> <th>In</th> </tr> </thead> <tbody> <tr> <td rowspan="2">AM Peak</td> <td>M4 West</td> <td>124</td> <td>138</td> </tr> <tr> <td>M4 East</td> <td>125</td> <td>141</td> </tr> <tr> <td rowspan="2">PM Peak</td> <td>M4 West</td> <td>86</td> <td>107</td> </tr> <tr> <td>M4 East</td> <td>101</td> <td>96</td> </tr> </tbody> </table>			Out	In	AM Peak	M4 West	124	138	M4 East	125	141	PM Peak	M4 West	86	107	M4 East	101	96
		Out	In																
AM Peak	M4 West	124	138																
	M4 East	125	141																
PM Peak	M4 West	86	107																
	M4 East	101	96																

5. You have now also requested traffic flow diagrams, journey times and turning movements for Alternative 11 (westbound on-slip). We do not see any value in this as reasonable inferences can be drawn from the modelling carried out for Alternative 10 (see Appendix C to this letter). In any event, this request was received on 8 June 2017 which is very late in the day and we do not think that this should be used to delay the timetable.

6. In relation to the items of information that you allege are outstanding, we comment as follows:

Alleged Outstanding Item & Date of request	WG Comment
ES Assessment of the west bound off slip. Meeting 10 April	No ES assessment of the west bound off slip has been undertaken as it is not proposed as a part of the Scheme. Objector alternatives were however dealt with in the ES, and an Objectors Suggested Alternatives Appraisal Report, published in march 2017, which invited comments and was circulated to all objectors along with some 110,000 homes. As set out in my letter of 2 June 2017, the only significant environmental impact appears to be landscape and visual impact. I note your client has different views and anticipate that these will be expanded upon in your evidence, in respect of which we may need to issue rebuttals in due course.
Breakdown of traffic using the east bound off slip Meeting 10 April	What is meant by “breakdown”? This request is not clear and has several possible meanings. This needs urgent resolution. Gary Davies, Arup telephoned Mr Southwell’s office first thing this morning (9 June 2017) and left a message to ask him to return his call. Please advise what is meant by “breakdown.”

Alleged Outstanding Item & Date of request	WG Comment
<p>Signage Strategy for Magor Services</p> <p>Meeting 10 April</p>	<p>We do not recall a signage strategy being requested at this meeting. It was said that WG would work with Roadchef to address signage at detailed design stage. Roadchef stated its preference to be to sign egress in all directions via junction 23. However, as you are aware from the meeting, there are several options, and the quickest route is via the existing M4 which will become a Trunk Road. WG will consider further, but we suggest your client sets out its preference in evidence, giving reasons.</p>
<p>CAD files of the amended eastbound off slip layout</p> <p>Letter of 10 April</p>	<p>A license was circulated to Vectos for signature on 10 April 2017. This has not been returned. Please arrange for signature and return so that the CAD files can be released.</p>
<p>Demand Flows from the SATURN model</p> <p>Email 17 March</p>	<p>This was discussed at the meeting of 10 April 2017 and it was explained by Mr Whittaker that the model was a strategic model and was not purporting to accurately predict traffic flows in and out of Magor Services. As such this request has not been taken further.</p>
<p>Confirmation of modelling of the Objectors Alternatives</p> <p>Email 17 March</p>	<p>All the objector's alternatives have been assessed on a common basis. However, a high level analysis only has been undertaken. No detailed extraction of data has been undertaken for any of the 22 alternatives, as was stated in our letter dated 2 June 2017.</p>
<p>Confirmation of level of trip suppression/trip induction at j23 and 23a</p> <p>Email 17 March</p>	<p>Again, this was discussed at the 10 April meeting with Bryan Whittaker, where it was explained that the Demand Model was a strategic model and did not purport to accurately predict flows to/from Magor Services with new access and egress arrangements. On that basis it was considered that the matter was dealt with. We would comment further as follows:</p> <p><u>Trip suppression</u></p> <p>This data is not directly used in any analysis to demonstrate the value of the Scheme proposal. Trip suppression is captured internally within the VDM process therefore trip suppression is implicit in all outputs related to the Demand Model. Hence a fine level of analysis is not required.</p> <p><u>Induced traffic</u></p> <p>Induced traffic is captured internally within the VDM process therefore induced traffic is implicit in all outputs related to the Do Something scenario.</p> <p>As the induced traffic comprises almost entirely of re-distribution with some minor mode switch, the outputs requested for re-distribution are the same as the output for induced traffic.</p>
<p>Confirmation of demand segments for trips to/from Magor Services</p> <p>Email 17 March</p>	<p>At the 10 April meeting, Brian Whittaker explained that the Demand Model runs on the basis of 10 model segments. For assignment purposes, the number of Demand Model segments are aggregated to five assignment model segments. The assignment flows that are actually produced are the combined sum of those five supply model segments. The reason for the aggregation in the assignment model is to assist convergence and reasonable run times. This is entirely consistent with WebTAG. Again, as discussed at the meeting of 10 April 2017, the Demand Model is a strategic model and is not being relied upon to accurately predict flows to/from Magor Services. On that basis, WG had considered the matter dealt with.</p>

Alleged Outstanding Item & Date of request	WG Comment
Generalised cost of trips to/from Magor Services by each available route Email 17 March	This request appears to have got lost in the correspondence and meetings that have taken place. WG letter to BLP dated 10 April suggested that the issue could be discussed further at the meeting of 10 April 2017, but it appears that did not occur. We can provide the generalised costs for trips to and from Magor Services, however in our opinion, this would involve unnecessary public expenditure because the Strategic Model is not being relied upon to accurately predict flows to and from Magor Services and I do therefore question the need for this.

7. I note that you have not responded on other matters raised in my letter of 2 June 2017 and I am disappointed not to receive any assurance that information will be forthcoming in response to the issues set out in section 6 of my letter. The urgent progression of those matters will be of assistance to the inquiry. It is noted that the requests for the same information were also made in our letters dated 21 February 2017 and 10 April 2017 and further supplemented in our letter dated 2 June. A list of the information requested in all the above three letters is repeated below:

Ref	Request
Original request: 21 February 2017 (repeated on 10 April and 2 June)	
1	On a Commercial in Confidence basis, a breakdown of the cost data used to inform the EBITDA analysis (Page 11 of Mr Turl's Proof of Evidence) and details of the assumptions employed to predict the effects of a change in visitor numbers and transactions on operating costs.
2	In respect of each of the Business Areas identified in the EBITDA analysis, could you confirm that each of these is operated directly (under franchise) by Road chef Limited?
3	In respect of the Other sales category, could you provide details of what these sales relate to and, if possible, further breakdown of these sales?
4	Further breakdown, if available, of the town or region of origin/destination of surveyed customers (see Q4. Where did you start your journey from? And Q6. Where will your journey end?).
5	Further breakdown (for example, Junction number), if available, of where surveyed customers joined the M4 (see Q17. Where did you join the M4?).
6	A copy of the original survey form used by Harris Interactive UK Ltd.
7	A copy of the survey dataset in Microsoft Excel / Access or other appropriate format.
Original request: 2 June 2017	
A	In respect of the above request. I acknowledge that your letter of 9 May 2017 indicates that the financial analysis has been updated to take into account the inclusion of the eastbound off-slip in the Scheme design. I would be grateful if relevant updates to this analysis could also be provided.
B	In addition to the above, in relation to the Harris Interactive UK Ltd survey, some data is reported on a county by county basis (such as trip origin and trip destination). We would be grateful if you could provide this information based upon the actual trip origin and destination, rather than simply by county. The way the data is currently presented appears to use old county boundaries which, coincidentally, could mean that local use of your client's facilities, is under represented. As above, a copy of the survey dataset in Microsoft Excel/Access or other appropriate format would assist.
C	<u>ANPR traffic data</u> We understand that Roadchef have some ANPR cameras which show the duration of visits and used to enforce parking time limits. As previously discussed, Welsh Government would welcome the information collected from these ANPR cameras.

8. I look forward to receipt of your suggestion as to a timetable for the exchange of evidence. You will appreciate that this is urgent, given the impending appearance date for Mr Turl, which we understand is fixed, as he is not available in July.
9. I appreciate Mr Axon was away this week, but he appears to be in next week, and it should have been anticipated that evidence preparation would be required at this time, in advance of Mr Simon Turl's appearance on 30 June, in order to ensure the smooth running of the inquiry. As you acknowledge, Mr Felgate indicated verbally, earlier this week and subsequent to my letter of 2 June that the outstanding information set out in our letter of 2 June would be provided today, in advance of Mr Axon's return on Monday. Furthermore, the suggestion that the provision of other information by the Welsh Government is outstanding is not correct. Your client and its consultants met with the Welsh Government's Mr Whittaker and Mr Felgate to discuss outstanding information requests and assurances were given about the Welsh Government's reliance on its strategic model that made some requests redundant. Furthermore, other requests are impacted upon by your clients or their consultants own actions, or were made very late in the day, as is set out above. In that context we cannot understand why you have not been able to agree our proposed timetable.

Yours sincerely



Martin Bates
Project Director

cc Mr Simon Turl, Chief Executive, RoadChef Ltd. By email
cc Mr Mike Axon, Director, Vectos. By email

Encls:

Appendix A	Detailed junction assessment outputs for J23 (LINSIG) and J23A (ARCADY) in the Do-Something Scenario.
Appendix B	The journey times from M48 Junction 2 (Chepstow) to M4 Junction 22 (Second Severn Crossing) using two different routes: <ul style="list-style-type: none"> • Via J23A (extracted from forecast year 2037 Do Minimum and Do Something scenarios); • Via J23 (extracted from forecast year 2037 Do Something scenario only).
Appendix C	Equivalent data (traffic flow diagrams, journey times and turning movements) for Objectors' Alternative 10.