

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



Llywodraeth Cymru
Welsh Government

Objection Ref OBJ0247 - Cycling UK

File Refs WG/REB/OBJ0247-1- Professor S Cole

WG/REB/OBJ0247-2 - Dr S Melia

WG/REB/OBJ0247-3 - R Geffen / H Mackay

Response to Objector's Evidence:

Professor S Cole - Environment

Dr S Melia - Environment

R Geffen / H Mackay - Environment

1.	AUTHOR	3
2.	SCOPE AND PURPOSE OF THIS PROOF OF EVIDENCE	4
3.	PUBLISHED SCHEME – CYCLING UK REBUTTAL	5
4.	BLUE ROUTE ALTERNATIVE – CYCLING UK REBUTTAL	13
5.	CONCLUSIONS – CYCLING UK	20

1. AUTHOR

1.1 I am Dr Peter Ireland. I am a Senior Director in the Planning and Development Division of RPS Group plc. My professional qualifications are set out in my main proof of evidence and are not repeated here.

1.2 The evidence which I have prepared and provide in this proof of evidence has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

2. SCOPE AND PURPOSE OF THIS PROOF OF EVIDENCE

- 2.1.1 Cycling UK have submitted Statements of Evidence in relation to the draft statutory Orders associated with the Welsh Government's proposals for the M4 Corridor around Newport (the Scheme), which has been received via the Programme Officer.
- 2.1.2 The evidence of Cycling UK is provided in three proofs of evidence from different witnesses as follows:
- i. Professor Stuart Cole (OBJ0247)
 - ii. Dr Steve Melia (OBJ0247)
 - iii. Mr Roger Geffen & Mr Hugh Mackay (OBJ0247)
- 2.1.3 My evidence will respond to the points raised in Cycling UK's evidence where it relates to the environmental aspects of the Scheme: the M4 Corridor around Newport (hereafter referred to as the Scheme), comprising a proposed new dual three lane motorway to the south of Newport and complementary measures.
- 2.1.4 My evidence will also respond to the environmental aspects of the alternative routes that Cycling UK has proposed.
- 2.1.5 Aspects of my evidence interface with the evidence of other witnesses including Matthew Jones (WG1.1.1), Bryan Whittaker (WG1.2.1), Stephen Bussell (WG1.3.1) and Ben Sibert (WG1.5.1).
- 2.1.6 My evidence is presented in the following structure, with a detailed contents provided at the start of the document.
1. Author
 2. Scope and Purpose of this Proof of Evidence
 3. Published Scheme – Cycling UK Rebuttal
 4. Blue Route Alternative – Cycling UK Rebuttal
 5. Conclusions

3. PUBLISHED SCHEME – CYCLING UK REBUTTAL

3.1 Sustainable Development

- 3.1.1 Dr Melia states in his evidence at section 1.1 that the Scheme 'is incompatible with the Welsh Government's sustainability policies'.
- 3.1.2 Mr Geffen and Mr Mackay state in their evidence at section 3 that 'this road proposal contradicts the Government's policies on sustainability by making car use more attractive and thus encouraging the growth of car use'
- 3.1.3 Prof. Cole states in his evidence at paragraph 119 that 'the motorway option is inconsistent with the Welsh Government's sustainable development duty, climate change commitments and aspirations to halt the loss of biodiversity'.
- 3.1.4 In response, paragraphs 26-48 of John Davies' Proof of Evidence (WG1.23.1) describe the consideration of sustainability during the development of the Scheme. Paragraphs 49-55 describe the consideration of climate change and greenhouse gases. Paragraphs 77-90 describe the consideration of ecology and nature conservation.
- 3.1.5 Paragraphs 198-216 of John Davies' Proof of Evidence (WG1.23.1) describe the sustainable development principle as defined for planning purposes, and how this was considered during the Scheme development.
- 3.1.6 Dr Melia states in his evidence at section 2 '*a transport policy that depends on continual increase in road capacity in order to satisfy increasing demand for travel is unsustainable*' and '*none of the supporting evidence explains what would or should be done if demand continues to expand in the future, as the Government appears to expect. Their implication is that road capacity can, and should, continue expanding indefinitely. The case for the road is based purely on a short-term perspective*'.
- 3.1.7 In response, the Scheme is not based on continual increase in road capacity. It is required to address an existing and long recognised problem. Complementary measures including the South Wales Metro also address travel demand.

- 3.1.8 The evidence presented to the inquiry correctly addresses the need for the Scheme. Technological advances will affect future travel demand and how we travel but at this time their impact cannot be forecast with any certainty. Nor are they likely to affect travel demand in the near future. The Scheme addresses a pressing and immediate problem that needs to be solved now; that is not taking a short term perspective but recognising that action is needed urgently and cannot wait for unpredictable future technological changes.
- 3.1.9 Mr Geffen and Mr Mackay state in their evidence at section 2 *'the proposed road scheme contravenes Government policies to tackle congestion, pollution and climate change, to improve public health and reduce physical inactivity and obesity, and to improve equality of opportunity'*
- 3.1.10 In response, paragraphs 119-125 of John Davies' Proof of Evidence (WG1.23.1) describe the consideration of air quality & noise during the development of the Scheme.
- 3.1.11 Paragraphs 118, 121, 125, 133 of John Davies' Proof of Evidence (WG1.23.1) explain the contribution of the Scheme to the Welsh Government's well-being objective 3: 'Help people live healthy and independent lives and support a healthy workforce.'
- 3.1.12 The Scheme addresses congestion on the existing motorway network and forms part of the Welsh Government's Programme for Government 2016-21. The economic benefits of the Scheme will address inequalities as recognised by the Welsh Government's well-being objectives such as objective 4: 'Improve prosperity for all across Wales, helping people into employment and sustaining jobs' (see paragraph 46 of John Davies' Proof of Evidence (WG1.23.1)).
- 3.1.13 Mr Geffen and Mr Mackay state in their evidence at section 3 *'it is remarkable to claim that building 15 miles of 3-lane motorway will reduce total carbon emissions'* and also state that the carbon assessment takes no account of *'the increased congestion and emissions that would result from the above in the wider area'*

3.1.14 In response, Tim Chapman's Proof of Evidence (WG.1.13.1) describes the carbon emissions associated with the Scheme. It states that analysis of the traffic flows on the wider network (both on the existing M4 and new section of motorway) shows that, even with forecast traffic increases, the Scheme is effectively Whole Life Carbon neutral, with calculations showing a Welsh Government M4 Corridor around Newport delivering a small saving overall. This is because of a combination of the new route being some 2.8km shorter and also it having significant congestion alleviation benefits over the "Do Minimum" scenario on the existing M4.

3.2 Equality and Social Exclusion

3.2.1 Mr Geffen and Mr Mackay state in their evidence at section 8 *'the Equality Impact Assessment is weak and incorrect in places'*.

3.2.2 As previously explained to Cycling UK (letter Ref: qA1174612/OBJ0247 Date: 8th August 2016 Section 7) these comments are incorrect and relate to previous and superseded reports, not the 2016 Integrated Health and Inequalities Impact Assessment of the scheme which was published as part of the March 2016 ES (Appendix 5.4) and is before the Inquiry.

3.2.3 For reference there have been a number of health and equalities impact assessments to inform different stages of the planning and decision making process from the strategic level, down to the shortlisted options and through to the published scheme, including:

- a) The 2012 Preliminary Health Impact Assessment:
(www.m4cem.com/downloads/reports/HIA%20Report.pdf)
- b) The 2013 HIA Consultation Document:
(www.m4newport.com/assets/issue-m4-hia_publication.pdf)
- c) The 2014 Health Impact Assessment:
(www.m4newport.com/assets/hia.pdf)
- d) The 2014 Equalities Impact Assessment:
(<http://www.m4newport.com/assets/hia.pdf>)

- e) The 2016 Integrated Health and Equalities Impact assessment, Appendix 5.4 of the March 2016 Environmental Statement:
(<http://gov.wales/docs/det/policy/160310-m4-es-a5-4-health-impact-assessment.pdf>)
- 3.2.4 From the comments and quotations made by Messrs Geffen and Mackay their comments appear to be made in regard to the 2014 Health Impact Assessment and the 2014 Equalities Impact Assessment. Both of these are now superseded documents. They were prepared to inform a previous stage of planning and decision making process.
- 3.2.5 Mr Geffen and Mr Mackay state in their evidence at section 8 *‘the proposed roads will make Newport more car-based so will enhance social exclusion – by marginalising further those who do not enjoy access to a car’.*
- 3.2.6 In response, congestion on the motorway currently affects the roads in Newport, causing delays and making it difficult for those who rely on public transport. The Scheme would address a range of problems and sectors. It would assist businesses that rely on road transport; it would make it easier for employees to get to work both by car and public transport; it would make it easier for everyone to travel within and outside Newport by road whether they use private or public transport. For these reasons it would arguably reduce social exclusion.
- 3.2.7 Mr Geffen and Mr Mackay state in their evidence at section 8 *‘the Equality Impact Assessment fails to address the negative impact of road-building on... protected groups under the Equality Act 2010’ and ‘it also fails to mention that people, especially children, from economically disadvantaged backgrounds, suffer most acutely from the pollution and road danger posed by motor vehicles’.*
- 3.2.8 In response, as detailed in Section 2.4 of the 2016 Integrated Health and Equalities Impact Assessment Welsh Government has a statutory duty to promote racial, disability, gender, age, sexual orientation, religious, reproductive and other equalities under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011. Those regulations require the production

of four-year strategic equality plans and objectives (current strategy: 2012-2016 (Welsh Government, 2012)). Promotion of equality forms part of the Public Health Strategic Framework to improve the quality and length of life for all members of the community. Assessment of equality, diversity and human rights, defined as “respecting and integrating diversity and equality of opportunity”, (Welsh Government, 2008) (page 161); Document 6.1.4) forms part of the Wales Transport Strategy and the WeITAG assessment requirements.

3.2.9 Part of the work to achieve these national objectives involves connecting up actions already being undertaken across the different sectors that contribute to improvements in health and prevent poor health and inequality. This includes driving the use of tools, such as Health Impact Assessment and Equality Impact Assessment, that enable planners and decision makers to further consider whether and how policies and initiatives may affect people's health and wellbeing.

3.2.10 As set out in Appendix 5.4 of the March 2016 ES the Equality Impact Assessment, diversity and human rights assessment of the Scheme has been undertaken in line within the general principles and guidance of NHS (Public Health Wales) Centre for Equality and Human Rights Equality Impact Assessment Guidance and Template Edition 3 (documents provided at (The NHS Centre for Equality and Human Rights, 2012) and guidance in (The NHS Centre for Equality and Human Rights, n.d.) and (Welsh Government, 2012)).

3.2.11 There are three formal stages in the Equality Impact Assessment process: Stage 1 of the Equality Impact Assessment comprises a high level appraisal (screening) to establish the likely aspects of the project with the potential to disproportionately impact upon sensitive community groups, thereby defining the requirement, scope and focus of any further assessment. In this instance, the initial Equality Impact Assessment has drawn from and built upon previous work, and was integrated within the project profile stage of the Integrated Health and Equalities Impact Assessment.

- 3.2.12 As demonstrated in Section 3 of the Integrated Health and Equalities Impact assessment, and summarised in Table 3.1 of Appendix 5.4 of the March 2016 ES sensitive/vulnerable groups were identified by construction and operational activity, and further considered by individual health pathway. This then informed the selection of the individual assessment protocols applied, and the assumptions applied to account for relative sensitivity.
- 3.2.13 In addition, section 3 Michael Bull's Proof of Evidence (WG.1.13.1) and in paragraphs 119-121 of John Davies' Proof of Evidence (WG1.23.1) explain how the Scheme would reduce overall population exposure to air pollution from road traffic. Ben Sibert's Proof of Evidence (WG1.5.1) describes the sub-standard design of the existing M4 and, in comparison, the improved safety of the proposed new section of motorway.
- 3.2.14 On the above basis, the comments made by Cycling UK indicating that the disproportionate impact have not been considered upon sensitive community groups, and that there has been a failure to comply with the Equality Act is incorrect, and unfounded.
- 3.2.15 Mr Geffen and Mr Mackay state in their evidence at section 8 *'promoting walking and cycling would help create cleaner air and safer streets, enabling them to enjoy better health and greater access to employment, education and training, social and other opportunities to enhance their health and wellbeing'*.
- 3.2.16 In response, by reducing congestion on the existing M4 and providing a more resilient motorway network the Scheme would provide better opportunities for people to access employment, education and training, social and other opportunities. The Scheme includes 4 new bridleways and 2 new public footpaths and provides for all footpaths to be maintained after construction. It does not preclude the Welsh Government and local authorities from other actions to improve provision for walking and cycling to complement the improvement of the strategic road network embodied in the Scheme.

3.3 Active Travel

- 3.3.1 Mr Geffen and Mr Mackay state in their evidence at section 2 *‘the additional motor traffic [would] exacerbate the congestion, pollution and road danger that deters people from cycling (or from allowing their children to do so)’*.
- 3.3.2 Mr Geffen and Mr Mackay state in their evidence at section 11 *‘one of the goals of the M4 proposal is “to achieve a cultural shift in travel behaviour towards more sustainable choices” but “the “culture shift” called for in the Active Travel Action Plan is palpably absent. The Active Travel Act requires cycling to be considered at the outset of any transport scheme. In the case of this M4 proposal, this has not been the case’*.
- 3.3.3 In response, the Active Travel Action Plan (2016) is referenced in Chapter 14 of the Environmental Statement (Document 2.3.2) and its Supplements (Documents 2.4.4 and 2.4.14).
- 3.3.4 The development of non-motorised user (NMU) routes as part of the Scheme has been the subject of consultation with Natural Resources Wales, local authorities and Sustrans.
- 3.3.5 The Scheme provides 4 new bridleways and 2 new public footpaths, totaling 3.14km in length, enhancing active travel facilities in accordance with the Active Travel (Wales) Act 2013.
- 3.3.6 The designation of these routes does not preclude any route as being classified as an Active Travel Route. The local authorities would need to audit these routes against the Active Travel (Wales) Design guidance and show them on its mapping of Active Travel routes. Commitment 172 in the Register of Environmental Commitments March 10th Update (ID009) refers to the commitment to undertake detailed design of such routes in consultation with the relevant stakeholders and taking account of relevant guidance.
- 3.3.7 Mr Geffen and Mr Mackay state in their evidence at section 11 *‘the proposal is antithetical to active travel. An overview of evidence on the promotion of active travel, commissioned by the Department for Transport, concluded*

that “In order to increase levels of physical activity, it is necessary to reduce use of the car”

- 3.3.8 In response, it is accepted that the Scheme would be likely to result in additional car-based travel but this is a reflection of society and the suppression of journeys because of the existing congestion problem. Making travel easier is not of itself a bad thing; it simply means that people avail themselves of the increased freedom to travel for work and leisure.

4. BLUE ROUTE ALTERNATIVE – CYCLING UK REBUTTAL

4.1 Environment

- 4.1.1 Prof. Cole states in his evidence at paragraph 40 that for the Blue Route *‘the resultant more freely flowing traffic could be expected to reduce emissions and noise, compared with that found at grade junctions’*.
- 4.1.2 In response, the ‘Appraisal of Objectors’ Alternative Blue Route Proposals Report’ (Document 6.2.35) considers the Blue Route and confirms it would not address the problems or achieve the objectives of the M4 Corridor around Newport. Section 8.4 states that the nature of works for the construction of the Blue Route would be likely to have a relatively low Capital Carbon impact. However, construction, which would take up to 8 years as an on-line improvement, would involve a substantial increase in congestion on the existing roads forming the Blue Route, resulting in additional tailpipe emissions.
- 4.1.3 Once constructed, the Blue Route would initially provide some small improvement to congestion problems on the existing M4 around Newport and therefore the User Carbon would remain close to that of the Do-Minimum scenario. However, future traffic growth would then see further congestion problems, and thus increase emissions overall.
- 4.1.4 Prof. Cole states in his evidence at paragraph 47 (c) that a key strength of the Blue Route is that a *‘relatively small area of SSSI land (is)affected at (the)section dualled south west of Magor on the present A4810 compared with the Black Route’*.
- 4.1.5 He states in his evidence at paragraph 47 (g) that the Blue Route *‘avoids the serious environmental consequences of the Black Route’*.
- 4.1.6 He states in his evidence at paragraph 119 that *‘the Blue route will have significantly less impact than a new motorway on environmentally sensitive sites south of Newport’*.

-
- 4.1.7 In response, a full appraisal of the environmental impacts of the Blue Route is set out in Section 8 of the 'Appraisal of Objectors' Alternative Blue Route Proposals Report' (Document 6.2.35).
- 4.1.8 When compared to the published Scheme, the Blue Route is likely to result in reduced adverse environmental impacts in some areas such as biodiversity, particularly with regard to impacts on the Gwent Levels SSSIs, and landscape. However, the Blue Route is a different type of road scheme running through a very different environment from the published scheme. It would therefore have different and, in some cases greater, impacts in certain areas. In particular the Blue Route would result in greater noise and higher air pollution levels through Newport and associated human health problems. I do not propose to reproduce Section 8 of the 'Appraisal of Objectors' Alternative Blue Route Proposals Report' (Document 6.2.35) but focus on noise, air quality and heritage.
- 4.1.9 With regard to noise the Blue Route would provide a negligible noise change along the existing M4. By contrast, properties near the roads which would form the Blue Route would experience a noise increase of approximately 2 to 3 dB. Currently there are approximately 2,000 properties within 200m of the Blue Route (excluding the St Modwen's development at Llanwern) that would experience a noise increase both during construction and once the works have been completed. Design measures would need to be explored that may offer some mitigation, for example noise barriers. Overall, there would not be a benefit to the Newport residents who live alongside the existing M4, whilst noise levels would worsen along the Blue Route (section 8.2 of the 'Appraisal of Objectors' Alternative Blue Route Proposals Report' (Document 6.2.35)).
- 4.1.10 With regard to local air quality properties and designated sites within 200m of the Blue Route (approximately 2,000 properties) would experience a deterioration in local air quality both during construction and once the works have been completed as a result of the increase in traffic. Given the measured existing elevated NO₂ concentrations adjacent to the A48 SDR, an increase in traffic would result in a risk of exceeding the annual mean

NO₂ objective at properties situated within 100m of the route. That encompasses approximately 575 properties which would be adversely effected (section 8.3 of the 'Appraisal of Objectors' Alternative Blue Route Proposals Report' (Document 6.2.35)).

4.1.11 Residents of Newport close to the existing M4 experience poor air quality as a result of motorway traffic which is regularly congested and/or at a standstill owing to incidents on the road. Out of seven Air Quality Management Areas designated by Newport City Council, four are influenced by the existing M4. As a result of the limited relief provided to the existing M4, there would be negligible benefits to the four Air Quality Management Areas in Newport that are associated with the existing M4. This would mean that motorway traffic would continue to contribute to poor air quality and associated human health problems in Newport.

4.1.12 With regard to heritage, whilst no listed buildings would need to be demolished to construct and operate the Blue Route and the Gwent Levels Landscape of Outstanding Historic Interest may not be impacted, nevertheless eight listed buildings, four scheduled monuments and three registered historic parks and gardens would have the potential to experience visual and noise changes within their settings (section 8.8 of the 'Appraisal of Objectors' Alternative Blue Route Proposals Report' (Document 6.2.35)).

4.1.13 Prof. Cole states in his evidence at paragraph 107 (b) that *'The negative consequences of the Blue Route have been overplayed. For example, the likely environmental impacts appear to have been assessed as if the Blue Route was a new road. However, as set out above, the Blue Route is a rationalisation and improvement project of existing roads. I would specifically note that in relation to the landscape and townscape, the Blue Route would almost exclusively directly affect only industrial and post-industrial areas'*.

4.1.14 In response, the Blue Route would pass through six of the eleven Local Landscape Character Areas. Of these it is considered that only LCA7: Caldicot Levels would see likely significant impacts in Landscape Character,

primarily due to the addition of new transport infrastructure to greenfield land. The Blue Route would introduce further built development and operational impacts into the area, which although it can be considered commonplace and exhibiting some detracting features.

4.1.15 In addition, GIS analysis described in section 7.4 of the 'Appraisal of Objectors' Alternative Blue Route Proposals Report' (Document 6.2.35) shows that approximately 15 commercial land plots and properties are within 30m of the Blue Route and would be at high risk of demolition should the Blue Route be taken forward. More significantly, approximately 20 properties would be at high risk of demolition and approximately 575 properties would be significantly affected or could be blighted by being situated within 100m of the Blue Route. These would experience increased noise and air pollution as described above.

4.2 Land Use, Community & Recreation

4.2.1 Prof. Cole states in his evidence at paragraph 34 that *'the Blue Route has more connections with local car and public transport, cycling and walking as the junctions all have provision for these other modes'*.

4.2.2 He states at paragraph 46 that *'the construction of the Blue Route specifically through grade separation allows better facilities for cyclists and pedestrians'*.

4.2.3 He states in his evidence at paragraph 105 (k) that *'the Blue Route provides several crossing places at intersections which will provide better access for cycling and walking than the present A48'*.

4.2.4 In response, no details to support these statements are provided in Professor Cole's Proof of Evidence. An appraisal of the impact of the Blue Route on Land Use, Community and Recreational resources has therefore been undertaken using the engineering plans prepared by the Welsh Government as part of the 'Appraisal of Objectors' Alternative Blue Route Proposals Report' (Document 6.2.35).

Cycle Routes and Other Routes used by NMUs

- 4.2.5 There would be a significant impact on the current alignment of the National Cycle Route 4 (NR4) to the north and south of the A48 Usk Way eastwards between Mendalgief Road and Corporation Road. Similarly it would appear that National Cycle Route 47 (NR47) would no longer be able to connect to NR4 to the south of the A48 at Usk Way.
- 4.2.6 Elsewhere local cycle/pedestrian routes along the A48 would be affected as a result of the new arrangements at the junction of the A48 and Corporation Road.
- 4.2.7 There would also be an impact on the local cycle route along the A4810 Queen's Way at North Road and the Wales Coast Path would be compromised at least at two locations.

Community Severance

- 4.2.8 Impacts on pedestrian access to community facilities are particularly badly impacted along the stretch of the A48 between Corporation Road and the access into the Newport Retail Park. These result from the impact on the local cycle/pedestrians routes alongside the A48 described above and the loss of footbridges across the A48 to the west of Nash Road and east of Queensway Meadows, thereby preventing off-road north-south access across the new expressway.
- 4.2.9 Due to the increased width of the A48 these footbridges cannot be re-provided at these locations and would severely impact on NMU access to the key community facilities to the south including the sports facilities at Newport Stadium; Coleg Gwent on Nash Road; and Newport Retail Park. Vehicular journeys would also be affected by the left in-left out access arrangements at Nash Road, requiring a long diversion for some journeys west via the new Corporation Road junction or east via the Queensway Meadows junction.

Community Facilities

- 4.2.10 Part of the floodlit playing fields and associated facilities to the south of the A48 would be lost as a result of the new slips to the elevated section of the

A48 over the new gyratory at Maesglas West. This would need to be re-organised, possibly within the existing land area.

4.2.11 To the north of the A48 there is also the potential for impacts to the Waterloo Hotel on the corner of the A48 and Alexandra Road.

4.2.12 There would be an impact on vehicular access to the Llanwern Bull public house along Queensway as a result of the new left in- left out access arrangement which would require longer journeys for some trips.

Residential Property

4.2.13 Residential properties impacted by the Blue Route include:

- a) Those properties to the north of the A48, east and west of Alexandra Road, together with their accesses would be impacted as a result of the new northern east and west slips which would be built over Watch House Parade.
- b) Those properties to the north of the A48, east and west of Alexandra Road as a result of the new elevated section of the A48 and retaining walls along the slips.
- c) New properties along Corporation Road near to its junction with the A48 as a result of the new arrangements at this location, particularly the new bridge and associated retaining walls.
- d) Existing properties to the north of the A48 between Nash Road and Queensway Meadows as a result of the new elevated section of the A48 and associated retaining walls.

Commercial Property

4.2.14 There would be an impact on the Docksway Recycling Centre as a result of the additional offline section of the A48. This is next to the landfill site and would preferably need to be re-located in the same area.

4.2.15 There would be an impact on land and facilities on the AIC Steel site west of the River Usk to the south of the A48 as a result of the new access to the Transporter Bridge.

- 4.2.16 There is likely to be an impact on land in front of Fanny's Rest Stop Café which is used for outside tables. This facility is along the alignment of National Cycle Route 4.
- 4.2.17 Land and property at the P Flannery Plant Hire site and Newport Car Company sites between the A48 and the River Usk would be lost as a result of the new alignment of the A48 to the south of Church Street in Newport.
- 4.2.18 Land at Discount Tyres and Auto Fix to the south of the A48 would be lost as a result of the new on-slip onto the new bridge over the A48 to Usk Way. The access to this property would also be lost as a result of the new off-slip.
- 4.2.19 Land at the Lysaght Institute would be lost as a result of the new arrangements at the junction of the A48 and Corporation Road. The Institute would also require a new access through the existing Morrisons car park.

5. CONCLUSIONS – CYCLING UK

- 5.1.1 This rebuttal is concerned with matters related to sustainable development, equality and social exclusion, active travel, and environmental effects raised by Cycling UK.
- 5.1.2 With regard to sustainable development I reiterate John Davies' proof of evidence that the motorway option is not inconsistent with the Welsh Government's sustainable development duty.
- 5.1.3 The issues raised by Cycling UK with respect to equality and social exclusion appear to relate to a superseded report and not the 2016 Integrated Health and Inequalities Impact Assessment of the scheme which was published as part of the March 2016 ES (Appendix 5.4) and is before the Inquiry.
- 5.1.4 With regard to the Active Travel Act it is acknowledged that the Scheme would be likely to result in additional car-based travel but this is a reflection of society and the suppression of journeys because of the existing congestion problem. Making travel easier is not of itself a bad thing; it simply means that people avail themselves of the increased freedom to travel for work and leisure.
- 5.1.5 When compared to the published Scheme, the Blue Route is likely to result in reduced adverse environmental impacts in some areas such as biodiversity, particularly with regard to impacts on the Gwent Levels SSSIs, and landscape. However, the Blue Route is a different type of road scheme running through a very different environment from the published scheme. It would therefore have different and, in some cases greater, impacts in certain areas. In particular the Blue Route would result in greater noise and higher air pollution levels through Newport and associated human health problems.
- 5.1.6 The Blue Route would provide a negligible noise change along the existing M4. By contrast, properties near the roads which would form the Blue Route would experience a noise increase of approximately 2 to 3 dB. Currently there are approximately 2,000 properties within 200m of the Blue Route (excluding the St Modwen's development at Llanwern) that would

experience a noise increase both during construction and once the works have been completed.

- 5.1.7 Given the measured existing elevated NO₂ concentrations adjacent to the A48 SDR, an increase in traffic would result in a risk of exceeding the annual mean NO₂ objective at properties situated within 100m of the route. That encompasses approximately 575 properties which would be adversely effected.
- 5.1.8 GIS analysis shows that approximately 15 commercial land plots and properties are within 30m of the Blue Route and would be at high risk of demolition should the Blue Route be taken forward. More significantly, approximately 20 properties would be at high risk of demolition and approximately 575 properties would be significantly affected or could be blighted by being situated within 100m of the Blue Route.
- 5.1.9 No details are provided in Professor Cole's Proof of Evidence that the Blue Route would provide better facilities and access for pedestrians and cyclists. On the contrary there are a number of locations where existing facilities are extinguished resulting in increased community severance.