

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



File Ref WG/REB/OBJ0307 - Law

Llywodraeth Cymru
Welsh Government

Objection Ref OBJ0307

Response to Objector's Evidence: Ellen Law

1. GROUNDS FOR OBJECTION

1.1. Details

1.1.1. Ellen Law has not submitted a Statement of Evidence but relies upon her objection correspondence dated 27 April and 3 May 2016 in relation to the draft statutory Orders associated with the Welsh Government's proposals for the M4 Corridor around Newport.

1.1.2. The Welsh Government responded to that objection correspondence on 8 July 2016 (ref qA1174612/OBJ0307). As set out in the response, the objection is based on the following:

1. Concerns over the impact on the Gwent Levels, Sites of Special Scientific Interest and wildlife.
2. Concerns over cost and funding and about the alleged economic benefits of the Scheme.
3. Concerns about the reasoning for the Scheme and its need in relation to traffic.
4. Concerns over climate change and carbon emissions.
5. Suggests greener transport options and the Blue Route as alternatives.
6. Concerns the Scheme does not meet the goals of the Wellbeing of Future Generations Act.

2. REBUTTAL

2.1. Points Raised

2.1.1. The Objector's points have already been covered in previous correspondence and subsequently in proofs of evidence as follows:

1. **Point 1** (*Concerns over the impact on the Gwent Levels, Sites of Special Scientific Interest and wildlife*) / 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 and 2.4.14). The Environmental Statement acknowledges the importance of the Gwent Levels and clearly identifies the magnitude and significance of effects on a wide range of environmental features and assets.
2. **Point 2** (*Concerns over cost and funding and about the alleged economic benefits of the Scheme*) / Matthew Jones's Proof of Evidence WG1.1.1 at section 13 addresses costs and budgets. WG1.1.1 paragraph 13.5 explains that funding for the delivery of this project has been explicitly identified and provision set aside within the Welsh Government's published capital plans for the next four years. Allocations are not made beyond a 4 year period but suitable forecasts are in place to enable assurance to be given that the full funding requirements associated with the project are available within a reasonable timescale should the decision be taken to proceed. The Project would be funded through a combination of UK Government borrowing and Welsh Government Transport capital budgets. The Welsh Government would not be allocating the full amount of its borrowing capacity to this scheme, important though it is. The balance of the current borrowing limit, over £500m, will be available to fund schemes in other parts of Wales from 2018/19 onwards when Stamp Duty & Landfill Tax are planned to be devolved to Welsh Government. The evidence of Stephen Bussell (WG1.3.1) addresses economic assessment and outlines the likely economic benefits of the Scheme.

3. **Point 3** (*Concerns about the reasoning for the Scheme and its need in relation to traffic*) / Section 16 of Bryan Whittaker's Proof of Evidence (WG1.2.1) outlines the traffic case for the Scheme. Section 8 of Matthew Jones' Proof of Evidence summarises the need for the Scheme and section 24 sets out its likely impacts and benefits.
4. **Point 4** (*Concerns over climate change and carbon emissions*) / The Carbon Report (Document 2.3.2, Vol.3, Appendix 2.4) and Tim Chapman's Proof of Evidence (WG 1.13.1) describes in detail that implementing the Scheme will achieve carbon neutrality compared to the Do Minimum scenario, taking into account the capital carbon associated with construction and the user carbon benefits. . The improvement in user carbon results from the shorter route for the new road, the relief of congestion and significant reduction of disruptive incidents relative to the Do Minimum scenario. Tim Chapman's assessment concluded that the introduction of the new Scheme should not hinder the efforts of the Welsh Government in achieving its climate change targets.
5. **Point 5** (*Suggests greener transport options and the Blue Route as alternatives*) / Matthew Jones in his Proof of Evidence WG1.1.1 at section 3 explains the background to the development of the Scheme, including consideration of alternatives. Section 9 explains how public transport improvements have been taken into account. An 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. As stated in Matthew Jones' Proof of Evidence WG1.1.1 at paragraph 24.17, the Scheme is considered by Welsh Government to be the long term, sustainable solution to the serious problems experienced on the M4 around Newport. In collaboration with the Welsh Government's proposals for a South Wales Metro, it forms a vital part of the Welsh Government's vision for an efficient and integrated transport network for Wales. There is a compelling case in the public interest for the Scheme to proceed.

6. **Point 6** (*Concerns the Scheme does not meet the goals of the Wellbeing of Future Generations Act*) / John Davies addresses the Well Being of Future Generations Act 2015 in his Proof of Evidence WG1.23.1 at paragraphs 26-48 and 198-216.

Annex – Correspondence List

Date	In/Out	Author	Email/Post/Meeting
27/04/2016	in	Ellen Law	Letter
3/05/2016	in	Ellen Law	Letter
8/07/2016	out	Matthew Jones	Letter

Ms E Law
Larmorna
Broadstreet Common
Peterstone
Wentloog
Cardiff
CF3 2TN

27th April 2016

Dear Sir or Madam,

Re: M4 Corridor around Newport

Formal objection - please forward to the Welsh Government.

I strongly oppose the proposal to build a new M4 motorway through the beautiful Gwent Levels.

I would like to see the Welsh Government protect our most important places for wildlife such as the Gwent Levels that are already recognised as being **nationally important** through their designation of SSSI status.

The Gwent Levels is extremely rich in wildlife with otters, water voles, wading birds such as lapwing, snipe, redshank and curlew, 25 rare plants including the world's smallest flowering plant *Wolffia arrhiza* and 144 rare species of insects.

Damage to the Gwent Levels will include;

- A total of 125 hectares of SSSI habitats including grazing marsh and reedbed lost or permanently damaged
- Permanent damage to 9 Sites of Importance for Nature Conservation
- Permanent loss of a section of Gwent Wildlife Trusts Magor Marsh Nature Reserve
- Loss of 2568m of SSSI reed and 9136m of SSSI field ditch which would be infilled or culverted, that are full of nationally rare plants and animals that have taken centuries to reach their current equilibrium. Replacing these with freshly cut channels cannot be described as a positive impact on biodiversity
- Habitat and species loss outside of "protected areas" has not been quantified but is also substantial
- Damage to protected conservation priority species populations and their habitats including European protected species

Llanwern steelworks, Tesco Warehouse, Gwent Europark, Uskmouth Power Station and the Aluminium and chemical works have already led to the loss of 910ha of wetland habitat (CCW 1991). Further loss has only continued over the last 25 years. The motorway proposals and the anticipated loss of habitats and species are not in isolation. Cumulative impacts of development on this nationally important landscape have already been catastrophic leaving habitats degraded and fragmented and making rare species more vulnerable. We cannot let the degradation of the Gwent Levels continue.

I don't believe that building a new six-lane motorway through the Gwent Levels ancient landscape is sustainable. The Welsh Government should do all it can to encourage cars off the road by providing greener transport options rather than making more space for traffic. It should also consider viable alternatives such as the blue route which is cheaper and will take less time to build.

I also don't believe that building this motorway meets the goals of the Future Generations and Wellbeing goals and in fact brings a sad future for the people of Newport surrounded by air and noise pollution with hundreds of acres of their cultural and natural heritage destroyed on their doorstep.

I urge you to stop this new road from being built and protect the natural environment and wildlife of the Gwent Levels.

Please ensure the Welsh Government receives this letter so my objection will be considered and counted.

Yours sincerely

A handwritten signature in black ink, appearing to read 'E Law'.

Ellen Law

Ms E Law
Larmorna
Broadstreet Common
Peterstone
Wentloog
Cardiff
CF3 2TN

3rd May 2016

To the Department for Economy, Science and Transport,

Dear Sir/madam

Re M4 Corridor Consultation

I am writing to object to the decision of the Welsh Government to opt for the black route which will clearly do permanent damage to the environment of the historic Gwent Levels, and sites of Triple SSSI status, despite having two other options which deliver similar outcomes regarding transport without wreaking havoc on the environment and are in fact less likely to burden future generations with the burden of debt similar to the PFI schemes in NHS.

I have attended both consultations and have been disappointed with the absence of balanced assessment and complete absence of facts and analysis which justifies the Welsh Government's decision to opt for the black route. I have formed the view that the black route is attractive to politicians because the Welsh Government has already purchased land on the Levels and as it is largely inhabited by wildlife is less likely to face opposition for compulsory purchase.

There is not a sufficiently fact-based risk assessment / analysis addressing the valid concerns raised by CALM and other environmental organisations lobbying against the black route. Efforts to mitigate the damage to the environment, resulting from the compulsory purchase of land across the Levels put forward by the Welsh Government are little more than piecemeal attempts to persuade the public that risks have been adequately addressed. I refer you to the Gwent Wildlife Trust and other charities as well as Stewart Cole's assessment, raising environmental concerns about protected species such as voles, bird populations, unique plant populations as well as realistic alternatives. The environmental charities have given an excellent evidence base of the impact of this route on wild life so I will just refer to their research rather than replicate it. The plans put forward have not explained how nature will overcome the barriers presented by a six lane motor way built across breeding / feeding grounds of many species of wildlife. The compensatory options on offer will not address the impact of this motorway on Nature. The Welsh Government has a legal and moral responsibility to protect the environment and triple SSSI status places responsibility on our Government to do just that.

I am not convinced by the economic arguments put forward to justify this decision. I travel across the UK for work and my experience is that the congestion at the Bryn Glas tunnels is not particularly

significant compared to other areas of the UK e.g. M42 M5/6 and eastern direction on M4 past Bristol . Also the Severn Bridge is a congestion point but is not addressed by the M4 corridor and the tolls on Severn Bridge are also a disincentive for businesses to invest in South Wales. The fact is that this traffic will just log jam at Cardiff or the toll booths on the bridge. Having spent many years on M4 accidents cause backlogs right down to Swansea and are nothing to do with these tunnels It seems to me that the proposal to build the M4 corridor is being put forward by leading political parties as a 'silver bullet' to simplistically claim to solve all the economic challenges faced by South Wales and is highly likely to fail based on economic theory and outcomes across Europe .

In terms of climate change evidence indicated that this proposal will increase carbon emissions by increasing car usage to / from Bristol whilst depriving more environmentally friendly options of future funding such as the development of a metro train system from the Valleys. More importantly significant investment will be tied up in the black route, the costs of which have been to have been "plucked out" of the air by the Welsh Government. Evidence of governmental borrowing is usually underestimated e.g. PFI schemes,

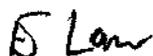
This is a key strategic decision which will impact on Wales for many years yet the financial implications for the rest of Wales have been underestimated in that funding the borrowing needed will deprive the rest of Wales of investment for transport infrastructure for a century.

I am aware that I am not a scientist or an environmentalist but I believe my concerns represent many citizens in Wales and therefore object to;

- Draft compulsory purchase orders providing legal powers to legally purchase land needed to build the black route
- Draft scheme variation order providing the Welsh Government with the power to reclassify the existing M4 between Magor and Castleton as a trunk road
- Draft scheme order providing a power to build a 3 lane motorway between Major and Castleton and the power to build bridges over waterways
- Draft line order with power to build a new length of trunk road
- Draft side road and
- Draft 19 certificates which will give power to replace Common Land and allotments.

I would appreciate a response to this letter.

Yours sincerely



Ellen Law



Ms Ellen Law
Larmorna
Broadstreet Common
Peterstone
Wentloog
Cardiff
CF3 2TN

Our Ref: qA1174612/OBJ0307
Date: 8th July 2016

Dear Ms Ellen Law

M4 Corridor around Newport

I refer to your correspondence dated 27th April and 3rd May 2016 in relation to the draft statutory Orders associated with the Welsh Government's proposals for the M4 Corridor around Newport.

All correspondence is classified as either an objection or a statement of support. Due to the contents of your correspondence, it has been classified as an objection to the draft statutory Orders. I understand your objection to be based on the following:

1. You have concerns over the impact on the Gwent Levels, Sites of Special Scientific Interest and wildlife.
2. You have concerns over cost and funding. You also have concerns about the alleged economic benefits of the Scheme.
3. You have concerns about the reasoning for the Scheme and its need in relation to traffic.
4. You have concerns over climate change and carbon emissions.
5. You suggest greener transport options and the Blue Route as alternatives.
6. You have concerns the Scheme does not meet the goals of the Wellbeing of Future Generations Act.

I shall address each of the above points using the above numbering, where appropriate:

1. Gwent Levels, Sites of Special Scientific Interest and wildlife

- 1.1 Whilst earlier options considered and consulted upon by the Welsh Government included some that passed through the middle of the Gwent Levels, much of which are designated as Sites of Special Scientific Interest, the proposed route now takes an alignment at the northern edge of the Gwent Levels.
- 1.2 Taking into account various physical constraints, including the Gwent Levels themselves, the alignment is as far north as possible, in order to minimise impacts on the Sites of Special Scientific Interest, so far as is possible, whilst being to the south of Newport and without having a significant detrimental effect on the existing residential areas of Duffryn and those proposed on the former steelworks site at Llanwern.
- 1.3 Chapter 10 of the Environmental Statement provides a detailed and comprehensive assessment of the effect of the Scheme on ecology.
- 1.4 The Gwent Levels are designated as a series of Sites of Special Scientific Interest (SSSI) primarily because of their reed and ditch habitats, the insect and invertebrate species that those habitats support, and for the presence of the Shriill carder bee. The Gwent Levels also support a variety of aquatic plants and other wildlife including badger, birds, bats, dormouse, great crested newt and other amphibians, otter, reptiles and water vole.
- 1.5 It is acknowledged that the construction and/or operation of new section of motorway would have a likely significant adverse long-term effect on the series of SSSIs, and on nine locally designated Sites of Interest for Nature Conservation (SINCs) due to habitat loss of grazing marsh, lowland mixed deciduous woodland, hedgerows, saltmarsh, and open mosaic habitats on previously developed land. Species potentially significantly affected in the long term include the shriill carder bee and other terrestrial invertebrates, otter and Cetti's warbler.
- 1.6 Neither the Newport Wetlands National Nature Reserve and RSPB Reserve, nor the Magor Marsh and Great Traston Meadows Gwent Wildlife Trust Nature Reserves would be significantly affected.
- 1.7 Welsh Government is under a legal duty to take reasonable steps to further the conservation and enhancement of the flora and fauna by reason of which the Gwent Levels are designated as SSSI. It recognised that without appropriate mitigation the Scheme could have a significant adverse impact on many habitats and protected species found along the route.
- 1.8 Having consulted with Natural Resources Wales (NRW) strategies have been developed for drainage and reed mitigation to minimise impacts on the SSSIs and a range of mitigation measures have been proposed. These measures are either integral to and embedded within the Scheme design or would be provided as additional mitigation. They include:

- a) Retention of existing reens by culverting and replacement of reens and ditches lost to the Scheme at a ratio of slightly greater than 1:1 together with measures to encourage colonisation by aquatic plants and invertebrates.
- b) Minimising land take across the Gwent Levels and where practicable avoiding land take to the south of the line of the new section of motorway.
- c) Provision of water treatment areas that includes ponds and reed beds to control the volume and quality of water discharged into the reen system.
- d) Avoidance of lighting other than at junctions and the river crossings and where lighting is required minimisation of light spillage.
- e) Provision of permanent mammal fencing along the new section of motorway, together with underpasses, oversized culverts and mammal crossings at suitable locations.
- f) Safe removal of dormouse, water voles, great crested newts and reptiles from the construction area to suitable habitat.
- g) Removal of bat roosts and the closure of badger setts to be undertaken during the appropriate season and replaced with artificial setts and bat roosts. Eel passes to be provided on all new sluices.
- h) Creation of areas of new habitat including the creation of a new area of saltmarsh and new areas of reedbed.
- i) Conversion of arable land to permanent grassland, enhancement of existing grassland and watercourses at selected locations, and the creation of new grasslands to mitigate for the loss of grazing marsh. Overall some 26ha of species rich grassland suitable as habitat for Shrilc carder bee would be provided.
- j) Provision of some 83ha of deciduous woodland and another 20ha of linear woodland belts and shrubs; a replacement ratio of 2.1 to 1.
- k) Reuse of woodland soils and rootstocks in new planting areas.
- l) Provision of 3.6km of new hedgerow.
- m) No construction in the wetted channels of the Rivers Usk and Ebbw.

1.9 I can confirm that there would be no compulsory purchase of land forming part of the Magor Marsh SSSI designation. The land required to deliver the Scheme is set out in documents available on the Welsh Government website:
<http://gov.wales/topics/transport/roads/schemes/m4/corridor-around-newport/draft-orders/?lang=en>.

1.10 Welsh Government clearly recognises that with the enactment of the Environment (Wales) Act 2016 Welsh Ministers are required to prepare a national natural resources policy for Wales and to take all reasonable steps to implement that policy. Similarly Welsh Ministers will continue to honour their ongoing commitments to international environmental conventions via the UK Government.

1.11 The effect of the proposed new section of motorway on the biodiversity of the Gwent Levels, including taking into consideration all of the proposed mitigation, has to be weighed against the significant social, economic and other environmental benefits that the Scheme would bring to Newport, the wider Cardiff region and Wales as a whole.

2. Cost, funding and economic benefits

- 2.1 The project has been estimated to cost £1,093m excluding VAT and inflation. It would be funded through a combination of UK Government borrowing and Welsh Government Transport capital budgets.
- 2.2 It is anticipated that three quarters of the costs of the project would be spent within the Welsh supply chain, with the remainder being spent on specialist products and services not currently available locally.
- 2.3 The economic performance of the scheme has been assessed by comparing the costs with the benefits that would be achieved. The costs include both the construction costs and the future maintenance costs. The benefits considered include journey time savings, vehicle operating costs and changes in accident costs.
- 2.4 Economic appraisal has indicated that the economic benefits of the scheme exceed the costs, such that the scheme represents value for money. When taking into account wider economic benefits, the benefits of the scheme are expected to outweigh the costs by a ratio of almost three to one. However, importantly there are also a range of anticipated economic benefits that are not quantifiable and these must also be considered.
- 2.5 The Economic Appraisal Report considers the likely costs and benefits of the scheme, providing calculations of value for money. That report is available online here: <http://gov.wales/docs/det/report/160310-m4-economic-assessment-report.pdf>
- 2.6 The Wider Economic Impact Assessment Report considers the likely impacts of the proposed scheme on the economy, during its construction and operation. That report is available online here: <http://gov.wales/docs/det/report/160310-m4-wider-economic-assessment-report.pdf>
- 2.7 It should be noted that the conventionally assessed transport benefits underestimate the total impact of the Scheme. The construction of a scheme of this nature would have economic impacts in its own right, and whilst employment effects of the scheme are temporary, the investment in training associated with the scheme is expected to have a lasting impact on the construction sector in the region.
- 2.8 In addition, during the operational phase, the Scheme is expected to result in reduced transport costs for businesses and increased access to employment opportunities by improving journey times and improved access to key employment sites. The anticipated effects of this have been quantified. The scheme would also result in improved journey time reliability and would reduce the costs of delays due to traffic incidents. The effects of this are not quantifiable but are expected to be of significant benefit to the Welsh economy.

- 2.9 Overall, the Scheme is expected to improve perceptions of South Wales as a place to visit and do business, and stimulate new investment.
- 2.10 Should the Severn Crossing Tolls be removed or reduced, there would be increased traffic along the M4 around Newport as a result. This has been taken into account as part of the Scheme design, with traffic forecasts considering scenarios with and without the tolls.

3. Reasoning for the Scheme and need in relation to traffic

- 3.1 Chapter 2 of the Scheme Assessment Report provides a summary of the background and need for the Scheme. Chapter 3 of the Scheme Assessment Report outlines existing conditions. The Scheme Assessment Report is available online here: <http://gov.wales/docs/det/report/160310-m4-scheme-assessment-report-en.pdf>
- 3.2 In summary, unreliable journey times and traffic congestion, particularly during peak times, are common occurrences on the M4 around Newport. This is due to the lack of capacity and alternative routes, especially during incidents and accidents. The level of congestion is expected to increase.
- 3.3 The existing M4 motorway between Magor and Castleton does not meet modern motorway design standards and a greater volume of traffic uses it than for which it was originally designed.
- 3.4 The M4 motorway between J24 and J29 is the most heavily trafficked section of road in Wales, forming part of strategic routes to the south west, Midlands and the south east of England. This section of the M4 is often congested, especially during weekday peak periods, resulting in slow and unreliable journey times, stop-start conditions, and with incidents frequently causing delays. Traffic forecasts show that the problems will worsen in the future.
- 3.5 For further information, the Local Model Validation Report shows current travel conditions, and is the basis for undertaking traffic forecasting and economic assessment. The Traffic Forecasting Report forecasts the traffic for different future scenarios. Both reports are available online here: <http://gov.wales/topics/transport/roads/schemes/m4/corridor-around-newport/reports/?lang=en>

4. Climate Change and carbon emissions

- 4.1 Welsh Government is aware of the briefing research note prepared by Anderson and Glynn in 2015 for Wildlife Trusts Wales and its concerns with respect to the potential effect of carbon emissions from the Scheme on climate change. Those have been addressed.
- 4.2 A Carbon Report has been produced for the Scheme and this is included as part of the Environmental Statement (ES) as Appendix 2.4.
- 4.3 The analysis acknowledges the impact of carbon generation during construction. An element of construction carbon is inherent in the government policy commitment to

improving the strategic transport network. During preparation of the published scheme great attention has been devoted to minimising levels of construction carbon.

- 4.4 Analysis also sets out that the South Wales road network contributes approximately 4.3% of the total carbon emissions in Wales each year. With the Scheme the total user carbon emissions on the South Wales network would reduce (albeit by a negligible amount – less than 1%), even though the number of vehicle trips would increase. This is due the Scheme being approximately 2.8km shorter than the existing M4, the reduction of the ‘stop-start’ traffic and smoother, more efficient traffic flow.
- 4.5 Future user carbon emissions are difficult to project beyond 2037 due to uncertainties in future technological improvements in the UK/Welsh vehicle fleet, energy generation and fuel mix.
- 4.6 The effect of the proposed new section of motorway on carbon, including taking into consideration all of the proposed mitigation, has to be weighed against the significant social, economic and other environmental benefits that the Scheme would bring to Newport, the wider Cardiff region and Wales as a whole.

5. Greener transport options and the Blue Route

- 5.1 As set out within Chapter 4 of the Environmental Statement, studies have shown that new or improved public transport services would only have minimal impact in terms of reducing traffic on the M4. Investment in public transport measures is therefore aimed at achieving wider benefits to the region than relieving motorway traffic. However, potential future public transport enhancement measures are considered to be complementary to a motorway solution. Public transport enhancement measures are being progressed by Welsh Government, who are developing proposals for a Cardiff Capital Region Metro system in parallel with the development of a new section of motorway to the south of Newport.
- 5.2 By way of background, since 1989 the Welsh Government has looked in detail at what travel related problems exist on the M4 around Newport, and asked the public, other stakeholders and those involved in managing transport in and around Newport what they thought the problems amount to. This process has identified 17 problems, relating to capacity, resilience, safety and sustainable development issues. Those problems, and the objectives that aim to address one or more of the problems, have been reaffirmed as part of the development work leading to the adoption of the M4 Corridor around Newport Plan in July 2014.
- 5.3 Between 2010 and 2013 more than 100 possible measures were considered, including network improvements, network management, demand management, alternative modes of transport and smarter sustainable choices. Some of the measures considered avoided road building. These were subject to consultation. The conclusion of Welsh Government was that a new section of motorway to the south of Newport was the sustainable, long term solution that would address the problems. This preferred strategy was set out in the draft Plan for the M4 Corridor around Newport which was consulted upon in 2013. The Plan was adopted in July 2014, following the consideration of consultation responses. Since that time the focus has been on design development.

- 5.4 You have referred to a suggested alternative referred to as the 'Blue Route', comprising works to the A48 Southern Distributor Road (SDR), and A4810 (also known as the Steelworks Access Road).
- 5.5 The Blue Route was put forward by third parties during a strategic consultation in 2013. As a result, consideration was given to the Blue Route in the 'Strategic Appraisal of Alternatives Considered During Consultation' report, which helped inform the Welsh Government's decision making on its Plan for the M4 Corridor around Newport.
- 5.6 Assessment at that time considered that the Blue Route would not address the problems on the existing M4 around Newport, and would create further operational problems. Variants of the Blue Route were analysed to see if any of them could provide a feasible alternative to a new section of motorway to the south of Newport. Conclusions were:
- a) Forecasts of future traffic volumes show that operational problems would continue to be experienced on the M4 around Newport with the variants of the Blue Route in place. Furthermore the addition of motorway traffic to the modified SDR and A4810 would cause operational problems on parts of the Blue Route.
 - b) Variants of the Blue Route would require land, beyond current highway boundaries, with associated impacts on businesses and individuals. There would be economic, noise, air quality and social impacts on communities, property and future development land allocations. Whilst disruption on the Gwent Levels would be significantly diminished this must be seen in the context of significantly greater disruption to those living and working along the Blue Route.
 - c) Delivery of the Blue Route could not be achieved quicker than the published scheme. Due to the statutory process requirements strategic and preliminary design work, including consultation, would be required. This would take several years. In addition construction of the Blue Route, whilst keeping the SDR and A4810 operational, has numerous uncertainties and construction risks associated with it, such that delivery quicker than the published scheme would be highly unlikely.
 - d) The cost of the Blue Route, as proposed by third parties, does not include free flowing connections to the existing M4, grade separation at existing junctions, or resolution of access to TATA Steel and future development areas from the A4810 (which are already committed via legal agreements). The variants of the blue route considered include these improvements and taking these into consideration the cost of the Blue Route, excluding land and compensation costs, would be in the order of £600-800m (as assessed in 2013), depending on the scope. Such a scheme however would not create economic benefits of the same order of the published scheme. Neither would it alleviate the existing problems of the M4, as referred to above, and therefore the Blue Route cannot be said to provide value for money.
- 5.7 The Blue Route performed poorly compared to the Black Route when it was appraised at the strategic stage. Overall, it was not considered to provide a sufficient long term solution to the identified problems associated with the M4 around Newport.

Consideration of options/alternatives, including the Blue Route is summarised in Chapter 4 of the published Environmental Statement.

5.8 Objections received to the March 2016 draft statutory Orders, including yours, have expressed support for the Blue Route. On this basis, should objections remain in place the Blue Route will be considered by an Independent Inspector at a Public Local Inquiry scheduled for this autumn. Consultation on alternatives with those affected, including those affected by the Blue Route, will take place before the Public Local Inquiry to ensure that all parties perspectives are able to be considered by the Independent Inspector.

6. You have concerns the proposal does not meet the goals of the Future Generations and Wellbeing Act.

6.1 The Welsh Government is subject to the duties relating to sustainable development set out in the Well-being of Future Generations Act 2015. A Sustainable development report has been prepared, which describes how the proposed Scheme aligns to the Welsh Government's sustainable development principles. That report is available online here: <http://gov.wales/docs/det/report/160310-m4-sustainable-development-report.pdf>

Further information, including the Environmental Statement and other reporting, is available at www.gov.wales/m4newport. Paper copies are also available for inspection at deposit points as set out on the website.

The proposals for the M4 Corridor around Newport are promoted by the Welsh Government as an important part of its Wales Infrastructure Investment Plan (WIIP) which has set a clear direction for capital investment in Wales that supports growth and jobs.

The M4 Corridor around Newport project is considered to be the sustainable, long term solution to the social, environmental and economic problems associated with the main gateway into South Wales.

The Scheme would improve accessibility for people as well as Welsh goods and services to domestic and international markets.

In light of the above I would be grateful if you could advise me if you are now content to withdraw your objection to the draft Statutory Orders.

Should you require clarification, or wish to discuss the above prior to responding, please do not hesitate to contact me or the project public liaison officer Brian Greaves on info@m4-can.com or 0845 600 2664.

Yours sincerely



Matthew Jones
Project Engineer