

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



Objection Ref OBJ6918

Llywodraeth Cymru
Welsh Government

File Ref WG/REB/OBJ6918– Grady

Response to Objector's Evidence: Catherine Grady

1. GROUNDS FOR OBJECTION

1.1. Details

1.1.1. Catherine Grady submitted a Statement of Evidence dated 26 June 2017 in relation to the draft statutory Orders associated with the Welsh Government's proposals for the M4 Corridor around Newport, which has been received via the Programme Officer.

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

1. Suggests the proposed interchange junctions at Magor and Castleton would not allow a driver to make a decision to use the new route in the event of an accident along the existing M4 near the Brynglas Tunnels and therefore it cannot be argued it would ease congestion.
2. Suggests the new route would be a bypass of Newport and thus would remove business.
3. Suggests that Objectors' Suggested Alternative No 19 has not been fully explored and should involve two more tunnels so that there would be four lanes on each side with widening. Suggests that would allow the two existing tunnels to take traffic whilst two others are built, each taking two lanes of traffic.
4. Agrees that the Welsh Government should not support a junction closure at High Cross because it would result in the villages of Bassaleg, Machen, Rogerstone have reduced access.
5. Suggests there is inadequate and sometimes non-existent signposting to Cardiff from the Magor junction for the A48 and the Docks link road and through Newport City Centre junctions to offer alternative journeys to commuters coming from the east. Suggests that signposting would greatly relieve the congestion, particularly when diversions are needed.
6. Suggests there is deliberate confusion being made about where the interchange is and impacts to the western end of the Scheme, i.e. reference being made to J29 Castleton when it should be a reference to J28 Tredegar Park and vice versa. Suggests the maps at the public consultation were illegible as to what properties would be affected.

7. Concerns about noise pollution to residents and states noise between the A48M and the A48 has drastically affected her sleep and health due to the increased traffic and especially on the A48 when there is a hold up on the A48M and the consequent speeding traffic that has resulted. Suggests the proposed route would navigate near new housing developments and would cause ill health through the noise and impact adversely on house prices. Concerns that people were deceived and not given the information of the possibility of a motorway when the plans were drawn and houses purchased, thus queries the meaning of Future Generations and Wellbeing proposals.

2. REBUTTAL

2.1. Points Raised

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

Objector's point reference	Rebuttal paragraph reference	Objector's point reference	Rebuttal paragraph reference
1	2.2.1	5	2.2.5
2	2.2.2	6	2.2.6
3	2.2.3	7	2.2.7
4	2.2.4		

2.2. Matthew Jones (Chief Witness)

2.2.1. Response to **Point 1** (Suggests the proposed interchange junctions at Magor and Castleton would not allow a driver to make a decision to use the new route in the event of an accident along the existing M4 near the Brynglas Tunnels and therefore it cannot be argued it would ease congestion):

1. Drivers would have the option of using either the new or existing motorway (which would be reclassified as an 'A' road but still be a trunk road operated and maintained by Welsh Government) depending on their journey or network conditions.
2. By providing for a new motorway to the south of Newport, strategic (through) traffic would make their journeys on a stretch of road designed to current standards of safety, with free flow conditions, with around half of the vehicles currently using it (and up to three quarters of HGVs) transferring onto the new road. Some local traffic and longer distance traffic (for example those using the A449) would continue to use the reclassified existing M4 around Newport. Reclassification would allow the layout of the existing road to be modified to improve safety by making alterations to junction layouts which are presently substandard, whilst

traffic could move freely given the levels of traffic transfer expected onto the new route. This would make travel safer, easier and more reliable.

3. The new section of motorway would benefit from interchange junctions at Magor and Castleton and intermediate junctions at Newport Docks Way and Glan Llyn. The intermediate junctions connect the new section of motorway with the local highway network via the A48 and A4810. This would provide additional network resilience should there be any incident or delay on the new or existing route. The existing junctions (and plans to reopen Junction 25 to northern Newport as part of the reclassification measures) along the existing M4 would continue to provide access to existing roads into Newport, including those joining the new section of motorway via the Docks Way and Glan Llyn junctions.
4. The existing and proposed variable message signs would help inform drivers with advance information about any incident or delay. That information would aim to assist driver decision making about their journey.

2.2.2. Response to **Point 2** (Suggests the new route would be a bypass of Newport and thus would remove business):

1. The new section of motorway would not be a bypass but would in fact benefit from two intermediate junctions at Newport Docks Way and Glan Llyn. The intermediate junctions would connect the new section of motorway with the local highway network and Newport city centre via the A48 and A4810. This would help support economic development and the movement of labour and goods. The proposed new Glan Llyn junction has been sited to link the new section of motorway to the new 4,000 home and 6000 job community being planned on former steelworks land. That is a strategic regeneration area for Monmouthshire County Council.

2.2.3. Response to **Point 3** (Suggests that Objectors' Suggested Alternative No 19 has not been fully explored and should involve two more tunnels so that there would be four lanes on each side with widening. Suggests that would allow the two existing tunnels to take traffic whilst two others are built, each taking two lanes of traffic):

1. As set out in section 3 of my Proof of Evidence (WG1.1.1) and in Chapter 4 of the Environmental Statement (Document 2.3.2) the M4 Corridor Enhancement Measures (CEM) Programme explored measures to

address issues of capacity, safety and resilience along the M4 corridor in south east Wales.

2. As part of the M4 CEM Programme, a comprehensive engagement process was launched in September 2010 culminating in a public consultation being held on different options and their associated transport, health, equality and environmental assessments, between March and July 2012 (Document 4.3.7). During this period more than 100 possible measures were considered including network improvements, travel planning, demand management and alternative modes of transport. This involved different options at Brynglas Tunnels, including new tunnels and widening to four lanes in each direction¹.
3. Packages of measures were prepared and were consulted upon in a Consultation Document alongside associated assessments. This included a package of measures involving Highway Option D: online widening on the M4 between Junctions 24 and 29, including an additional tunnel at Brynglas. Analysis carried out during the M4 CEM Programme was brought together and published in a WelTAG Stage 1 Strategy Level Report (Document 4.3.15) in June 2013.
4. The appraisals undertaken indicated that Option D would not provide long term resilience to the motorway and trunk road network in south east Wales and it would not provide sufficient capacity in the longer term, with severe operational problems continuing to be experienced on some sections, whilst it would have adverse impacts on people and the economy during construction. It would also not contribute towards addressing the Noise Action Planning Priority Areas (NAPPA), and Air Quality Management Area (AQMA) issues alongside the motorway in Newport. In terms of biodiversity, Option D was assessed as potentially having a moderate adverse impact. It was recommended that Option D be discounted. The discounting of this option also reduced the amount of uncertainty and anxiety for some residents and businesses in the Newport area. Of the options then available, an additional section of dual

¹ <http://m4cem.com/downloads/reports/Alternatives%20Considered.pdf>

carriageway road to the south of Newport was the Welsh Ministers' preferred solution to address the identified problems.

5. Initiatives in 2013, including discussions between the Welsh Government and HM Treasury/Department for Transport, created potential funding opportunities for Welsh Government infrastructure projects. As a consequence, a decision was taken to further reconsider the options available to address the transport related problems on the M4 around Newport. Further appraisal was undertaken of options that included some of the M4 CEM options, motorway options, and complementary measures. The Welsh Ministers again determined that a new section of dual 3-lane motorway to the south of Newport, in addition to complementary measures, should be progressed (Document 4.3.17).
6. As I explain in section 23 of my evidence (WG1.1.1) as part of the current statutory process, suggested alternatives can be put forward by any individual or organisation to the Welsh Government and Inspectors to consider. This includes Objectors' Suggested Alternative No 19 as you refer, as is described and appraised in Document 4.7.2. The appraisal explains how online widening of the existing M4 to provide a dual 4-lane motorway between Junction 29 (Castleton) and Junction 26 (Malpas), and a dual 3-lane motorway between Junction 26 and Junction 25 (Caerleon) would include the provision of a new westbound 3-lane tunnel at Brynglas and the existing Brynglas twin bore tunnels would carry a total of 3 lanes of eastbound traffic. The appraisal concludes it would:
 - a) Not provide sufficient capacity in the longer term and congestion would remain at peak times, particularly between J25 and J24;
 - b) Have adverse impacts on noise levels, air quality and emissions to the north of Newport;
 - c) Increase the impact on the existing corridor by providing an additional tunnel and online widening which requires the demolition of properties and existing structures to accommodate the proposal;
 - d) Need widened structures which would run close to a number of historical and archaeological interests, including listed buildings and Schedules Ancient Monuments;

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- e) Avoid impacts to the south of Newport, including the Gwent Levels, the Newport Transporter Bridge and also the Llanfihangel Rogiet Conservation Area;
 - f) Have reduced accessibility benefits compared to the proposed scheme and less opportunity to provide non-motorised user benefits; and
 - g) Have high engineering risks with the need for additional structures and tunnel.
7. The objectors suggested alternative would have similar appraisal against the scheme objectives as alternative No. 19. This alternative route proposal can be considered to provide equivalent traffic user and economic benefits as alternative No. 19 as it seeks to provide the same provision for traffic movements.
 8. Whilst there would be additional capacity around the Brynglas tunnels, the most heavily trafficked section of the M4 around Newport is west of the tunnels and without a new road there would remain capacity and network resilience problems. The suggested alternative would also offer reduced accessibility benefits compared to the proposed Scheme and less opportunity to provide non-motorised user benefits.
 9. The costs of this alternative route proposal can be considered greater to alternative No. 19; as the cost of a new tunnel would be greater with increased widening and tunnelling.
 10. This alternative would require more land and property acquisition than alternative no. 19.
 11. The Benefit to Cost ratio of this alternative can be considered thus no better than that for alternative No. 19 at approximately 0.17, which offers poor value for money.
 12. In summary, the appraisal against WeITAG criteria would be similar or worse than alternative No. 19:
 - a) Widening the existing M4 would not contribute to helping reduce air quality problems along the existing M4 where there are multiple air quality management areas;

- b) Noise problems as existing would be expected to worsen with increased traffic and speeds around Brynglas junctions;
- c) With operational problems expected to remain west of the tunnels, the proposal would not help reduce carbon emissions;
- d) With operational problems expected to remain west of the tunnels, the proposal would not help improve economic performance in South Wales;
- e) There would be a significant permanent impact on landscape and townscape with a cutting. However landscape impacts to the south of Newport on the Gwent Levels, the Newport Transporter Bridge and the Llanfihangel Rogiet Conservation Area would be avoided
- f) Impacts on biodiversity and heritage on the Gwent Levels would be avoided with online improvements to the existing M4. However, widened structures would run close to a number of historical and archaeological interests, including listed buildings and Schedules Ancient Monuments.
- g) Social impacts would be worse due to the greater extent of property demolition that would be required to the housing area above the existing tunnels due to the proposed new cutting. This would have greater adverse impacts on equality, diversity and human rights.

13. The Welsh Government is not promoting the Objectors' Suggested Alternatives.

2.2.4. Response to **Point 4** (Agrees that the Welsh Government should not support a junction closure at High Cross because it would result in the villages of Bassaleg, Machen, Rogerstone have reduced access):

1. The Welsh Government is not promoting any junction closures, including at Junction 27 (High Cross). In fact, the option was first considered (and then dismissed) as part of the M4 CEM Programme in 2011 when appraisal concluded:
 - a) The closure of J27 would lead to adverse knock-on effects at J28, with traffic redistributing to adjacent roads and junctions;
 - b) Closing J27 would adversely impact on local accessibility;

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- c) Safety improvements at J27 would reconfigure the junction and provide a more beneficial alternative.
2. Again, as I explain in section 23 of my evidence (WG1.1.1) as part of the current statutory process, suggested alternatives can be put forward by any individual or organisation to the Welsh Government and Inspectors to consider. This includes Objectors' Suggested Alternative No. 22 as you refer, as is described and appraised in Document 4.7.2. That suggested alternative comprises closure of the east facing slip roads at Junction 25 (Caerleon) and Junction 26 (Malpas), and the complete closure of Junction 27 (High Cross) with the aim of reducing the use of the existing M4 by local traffic. The Welsh Government's appraisal concludes that it would:
- a) Not address the capacity issues and would limit accessibility for adjacent residential areas;
 - b) Result in an increased reliance on the local road network;
 - c) Significantly increase in traffic along the existing M4 corridor leading to more congestion and therefore increased journey times for traffic passing Newport on the motorway, compared to the Scheme;
 - d) Increase local road traffic throughout Newport, and in Magor, Undy, Caldicot and Rogiet; and
 - e) Avoid impacts to the south of Newport, including on the Gwent Levels and the Newport Transporter Bridge, and also the Llanfihangel Rogiet Conservation Area.
3. The Welsh Government is not promoting the Objectors' Suggested Alternatives.
- 2.2.5. Response to **Point 5** (Suggests there is inadequate and sometimes non-existent signposting to Cardiff from the Magor junction for the A48 and the Docks link road and through Newport City Centre junctions to offer alternative journeys to commuters coming from the east. Suggests that signposting would greatly relieve the congestion, particularly when diversions are needed):
1. Whereas drivers who are unfamiliar with their journey may rely on signs, I consider commuters are less likely to do so.

2. With the increasing usage of satnavs, drivers generally are also less likely to follow signs without considering other options.
 3. As a strategy, signing alternative routes has the disadvantages of potentially causing driver confusion or indecision and can lead to a proliferation of signs. The M4 is the strategic route to Cardiff from the east.
 4. The A4810/A48 is a designated diversion route in times of M4 closure.
 5. Section 8 of my evidence (WG1.1.1) sets out the existing and forecast problems on the M4 around Newport, including capacity, resilience, safety and sustainable development issues. These problems have been developed involving the public and interested stakeholders. Appraisal has concluded that only a new section of motorway to the south of Newport would address the identified problems.
 6. The existing and proposed variable message signs would help inform drivers with advance information about any incident or delay. That information would aim to assist driver decision making about their journey, aiming to utilise the improved network resilience that the Scheme would provide, as has been explained in response to your other points above.
 7. Appropriate signage would be provided should the Scheme proceed, which would be agreed with the relevant authorities.
- 2.2.6. Response to **Point 6** (Suggests there is deliberate confusion being made about where the interchange is and impacts to the western end of the Scheme, i.e. reference being made to J29 Castleton when it should be a reference to J28 Tredegar Park and vice versa. Suggests the maps at the public consultation were illegible as to what properties would be affected):
1. The location of the proposed junctions and route is clearly shown on the published plans, available in the Inquiry Library and on the Welsh Government website. Please refer to the associated plans alongside the published draft Orders and Environmental Statement here: <http://m4-newport.persona-pi.com/2-draft-orders>. Should you require any further or specific information, please do not hesitate to contact our Public Liaison Officer: email: info@m4-can.co.uk; or telephone: 0845 600 2664.

2. In terms of the public consultation, significant efforts were made to help people with an interest in the proposals understand the available information and have any queries addressed appropriately. As was recorded in the 2015 Public Information Exhibitions Report (<http://gov.wales/docs/det/publications/170117-m4-corridor-around-newport-en.zip>), an evaluation survey of attendees showed 90% 'tended to agree' or 'strongly agreed' that the exhibitions helped them to understand the proposals. Furthermore, 92% selected 'YES' on a touchscreen computer which asked "Have you found all the information you wanted today?". As outlined above, a designated Public Liaison Officer aims to help people contact the project team to help address any concerns or queries where possible and has been available throughout the consultation, design and inquiry process. He has no record of any contact by you either directly or at the exhibitions.

2.2.7. Response to **Point 7** (Concerns about noise pollution to residents and states noise between the A48M and the A48 has drastically affected her sleep and health due to the increased traffic and especially on the A48 when there is a hold up on the A48M and the consequent speeding traffic that has resulted. Suggests the proposed route would navigate near new housing developments and would cause ill health through the noise and impact adversely on house prices. Concerns that people were deceived and not given the information of the possibility of a motorway when the plans were drawn and houses purchased, thus queries the meaning of Future Generations and Wellbeing proposals):

1. As I explain in section 8.26 of my evidence (WG1.1.1) traffic growth along the existing M4 around Newport has contributed to noise pollution, affecting neighbouring residential communities. Newport has various designated Noise Action Planning Priority Areas (NAPPAs) including along the M4. Without transferring significant levels of traffic away from the existing M4 around Newport, the identified current air quality problems will remain and are expected to worsen with future traffic growth and capacity problems. The expected exacerbation of operational problems on the M4 around Newport will also contribute to increased noise issues.
2. Based on the predicted noise changes, a greater number of receptors are likely to experience a noise decrease rather than a noise increase as a

result of the Scheme. The noise and vibration effects of the Scheme are detailed by Mr Phillip Evans in his evidence (WG1.14.1).

3. The 2016 Integrated Health and Equalities Impact Assessment (Document 2.3.2, Appendix 5.4) considers how the Scheme could influence public health and wellbeing in the areas surrounding the proposed new section of motorway and the existing M4 around Newport through environmental and socio-economic pathways. It concluded that the Scheme would have small quantifiable net positive health impacts due to changes in environmental noise and air pollution exposure, together with likely health and wellbeing benefits from employment, training and investment associated with the Scheme. No significant permanent adverse health and wellbeing impacts due to changes in access to services, recreation/physical activity or community severance or other relevant social pathways have been identified.
4. My evidence (WG1.1.1) describes in section 3 the background to the Scheme. This includes the protection of a corridor for planning purposes, first published in 1995 with a TR111 Notice, subsequently revised in 1997, 2006 and 2014. The revised 2014 preferred route followed consultation on the draft Plan and adoption of the Plan for the M4 Corridor around Newport (July 2014). The protected corridor would appear on searches as part of property purchases. Furthermore, the Welsh Government has made significant efforts to make people aware of the proposals since the early 1990s as part of stakeholder engagement and public consultation exercises and associated publicity.
5. As I set out in my evidence at section 16, the Welsh Government is subject to the duties relating to sustainable development set out in the Well-being of Future Generations Act 2015. The Welsh Government has applied a Sustainable Development approach throughout developing a solution to the problems associated with the M4 around Newport. Early strategic work considered all social, environmental and environmental factors and involved stakeholders to identify aims and objectives. A long term approach has been taken to considering the transport and wider needs of future generations. Option assessment considered preventative packages of measures seeking to reduce demand on the network before identifying the need for a new section of road. The proposed Scheme has

been designed in collaboration with public transport enhancements including electrification of the mainline railway and Metro, enhancing access to existing and potential public transport measures. The new section of motorway and reclassification of the existing M4, in combination with Metro is a hugely important part of the Welsh Governments vision for an efficient, integrated transport system for Wales.

6. The Proof of Evidence of John Davies (WG1.23.1) considers the application of the Sustainable Development principle during development of the project and also alignment with the recently published Welsh Government objectives under the Wellbeing Act. He considers the balance between the economic, social and environmental impacts of the Scheme and concludes it should proceed.

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