



Llywodraeth Cymru
Welsh Government

Welsh Government

M4 Corridor Around Newport

The Plan

Consultation Participation Report



July 2014

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Executive Summary

Introduction

The M4 Corridor around Newport draft Plan was published by the Welsh Government in September 2013 to outline its preferred strategy to address transport related problems on the M4 between Magor and Castleton.

This Consultation Participation Report summarises the M4 Corridor around Newport draft Plan and the results of its associated engagement and consultation process.

As a result of on-going discussions with the UK Government there has been a significant change in the assessment of affordability of major enhancement of the M4. On the 26th June 2013 Edwina Hart AM CStJ MBE, Minister for Economy, Science and Transport, published the following written statement:

“Addressing the capacity and resilience issues on the M4 around Newport is the top transport challenge that we face in ensuring that Wales has an effective economic infrastructure which improves our competitiveness and access to jobs and services. Following Cabinet discussions earlier this week, I am therefore pleased to announce the next steps in relation to the M4 corridor in south east Wales.

As a result of ongoing discussions with the UK Government there has been a significant change in the assessment of the affordability of a major enhancement of the M4. Building on the extensive development and consultation work undertaken on M4 Corridor Enhancement Measures (CEM), we will be consulting formally over the summer with Natural Resources Wales in order to go out to public consultation this September with a finalised draft Plan and Strategic Environmental Assessment (SEA) Report.

If implemented, the draft plan would lead to a motorway being built south of Newport.”

The main element of the draft Plan is the provision of a section of three lane motorway between Magor and Castleton, to the south of Newport. This mainly follows the existing Preferred Route that is protected for planning purposes, as revised in 2006. The draft Plan is compared to two Reasonable Alternatives and the Do Minimum Scenario.

The consultation responses reported within this M4 Corridor around Newport Participation Report, in addition to the wider engagement and consultation that has shaped the development of the draft Plan, will be used to help the Welsh Government decide whether or not to adopt its draft Plan, with or without amendments.

Background

The M4 is critical to the Welsh economy. It forms part of the Trans European Transport Network (TEN-T) and is the gateway to Wales, transporting people and goods to homes, industry and employment. It provides access to ports and airports

and serves the Welsh tourism industry. The M4 Motorway between Magor and Castleton is the most heavily trafficked section of road in Wales, forming part of strategic routes to the Midlands and the South East of England. However, it does not meet modern motorway design standards. 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.

Existing problems relate to capacity, resilience, safety and issues of sustainable development. Traffic forecasts show that the problems will worsen in the future.

The aims of the Welsh Government for the M4 Corridor around Newport are to:

1. Make it easier and safer for people to access their homes, workplaces and services by walking, cycling, public transport or road.
2. Deliver a more efficient and sustainable transport network supporting and encouraging long-term prosperity in the region, across Wales, and enabling access to international markets.
3. To produce positive effects overall on people and the environment, making a positive contribution to the overarching Welsh Government goals to reduce greenhouse gas emissions and to making Wales more resilient to the effects of climate change.

Since the early 1990s, much assessment and consultation has been undertaken to develop a preferred solution to the problems on the motorway around Newport. In the past these have stalled due to the lack of available funding. Recent initiatives have created potential funding opportunities for Welsh Government infrastructure projects. As a consequence, the decision was taken by the Welsh Government to further reconsider solutions to resolve transport related problems on the M4 around Newport. In September 2013, the Welsh Government published its preferred strategy for the M4 Corridor around Newport in its draft Plan, which comprises a new section of the three lane motorway between Junctions 23 and 29 to the south of Newport, accompanied by complementary highway, walking and cycling measures.

Between September and December 2013 the Welsh Government undertook a public consultation on its draft Plan and associated environmental, health and equality assessments.

This Consultation Participation Report summarises the results of the public consultation and contributes to a wider suite of draft Plan documents that aim to help the Welsh Government make an informed, evidence based decision on whether to adopt its draft Plan, with or without amendments.

The Welsh Government's decision making process is informed by a number of supporting documents that are published alongside and/or are informed by this Consultation Participation Report, including the following:

- WelTAG Stage 1 (Strategy Level) Appraisal Report¹;
- Strategic Environmental Assessment (SEA) Environmental Report;

¹ Welsh Transport Planning and Appraisal Guidance (WelTAG) is applied to all transport strategies, plans and schemes being promoted or requiring funding from the Welsh Government

- Equality Impact Assessment;
- Health Impact Assessment;
- Strategic Appraisal of Alternatives Considered during draft Plan Consultation Report; and
- Strategic Habitats Regulations Assessment (SHRA).

These documents and further information about the M4 Corridor around Newport can be found at www.m4newport.com.

Engagement and Consultation

Recognising the potential level of public interest in transport issues within the M4 corridor around Newport, and the number of people potentially affected by the preferred strategy and its Reasonable Alternatives presented as part of the M4 Corridor around Newport draft Plan, the Welsh Government undertook wide-ranging engagement with stakeholders and local people.

The engagement work has been appropriately aligned, in terms of timing and decision making, to the technical assessment process of the M4 Corridor around Newport draft Plan, which helped to shape the M4 Corridor around Newport Consultation Document. During the engagement process, the Welsh Government and its project team ensured that all those who had expressed an interest in the M4 Corridor Enhancement Measures (M4 CEM) were aware of this consultation via email or letter. Similarly, a wide range of stakeholders were also informed of the consultation which they were likely to be interested in or affected by the proposals outlined in the draft Plan and its associated assessments. This aimed not only to satisfy legislative drivers requiring participation, but was a genuine exercise to engage the community and other stakeholders in the Welsh Government's draft Plan and encourage people and organisations to identify issues and share opinions, to help inform its decision making process.

The M4 Corridor around Newport public consultation ran between 23 September and 16 December 2013. It asked participants to comment on the Welsh Government's preferred strategy and two Reasonable Alternatives to addressing transport related problems on the M4 Corridor around Newport.

The public consultation built on previous development work and public consultation, which has helped shape the Welsh Government's draft Plan. For further information, see www.m4cem.com and www.m4newport.com.

The results of the draft Plan's public consultation are provided in full in a factual report, found at Appendix A1. This Consultation Participation Report provides a summary of the engagement and consultation process undertaken for the draft Plan and its associated assessments.

Activities Undertaken

A comprehensive promotion and publicity campaign was undertaken to make people across South Wales aware of the opportunity to engage and comment on the M4 Corridor around Newport public consultation. The Minister for Economy, Science and Transport advised all AMs and MPs in the South Wales area of the public consultation. All Local Authorities and Clerks of Community Councils in

the Newport area were also notified. The Welsh Government arranged for adverts to be placed in the Capital Times, Cardiff and South Wales Advertiser, Marshfield Mail, Newport Voice Magazine and the Big Issue Cymru. In addition posters were also displayed at Motorway services along the M4 (Magor to Castleton) and at all Document Deposit Points. The Welsh Government also arranged for 110,000 leaflets to be distributed to properties within the Newport area. A radio advertising campaign was also aired for the duration of the consultation period.

A dedicated consultation website, an information hotline and email address, 2 stakeholder workshops, and 10 public exhibitions were held in locations across Newport.

Participants included members of the public as well as a range of organisations; some of which represented Welsh communities, economic, environmental and transport interests.

A total of 1,864 responses to the consultation were analysed. Of these, 48 were identified as ancillary submissions from respondents who sent more than one response. The total number of unique respondents participating in the consultation was 1,816.

The consultation received at least 675 responses that were identical or largely identical: these were categorised as part of an ‘organised response’ on behalf of the Woodland Trust². A number of other submissions included references to the views of interest groups, or extracts from interest groups’ statements. While it is not feasible to identify the exact number of submissions that have been influenced by interest groups, analysis suggests that more than 200 submissions (in addition to the approximately 675 organised submissions) use phrases resembling those used in interest group publications related to the consultation. Other groups whose public statements have been referred to or quoted from in (individual) respondents’ submissions include:

- The Campaign Against the Levels Motorway (CALM);
- The Royal Society for the Protection of Birds (RSPB);
- Friends of the Earth (FoE); and
- Wildlife Trusts Wales.

Along with their public statements with regard to the proposals, interest groups’ websites and social media commonly included template responses and guidance on how their members and others might respond to the consultation. Issues raised by interest groups included potential environmental impacts, the need case, traffic forecasts, and costs. Alternative options are also often suggested, with people being encouraged to submit them to the Welsh Government as part of their response. For examples, please see Appendix A2. A sample of media coverage during the participation process is provided at Appendix A3.

² It is common for major public consultations to attract attention from interest groups and in some instances groups initiate or encourage individuals to submit a standard or semi-standard response to the consultation. Such submissions are referred to as organised responses in this report. A submission was identified as part of an organised response when 20 or more identical responses were received.

There are several responses that refer to an alternative to the draft Plan suggested by the Institute of Welsh Affairs (IWA) and the Chartered Institute of Logistics and Transport (CILT) 'The Blue Route' paper, authored by Professor Stuart Cole.

The Welsh Government analysed all comments, equally. All participants are listed at the end of the Consultation Participation Report.

Whilst a total of 1,816 unique responses were directly to the Consultation Document, more than 1,200 people attended an M4 Corridor around Newport event. Furthermore, nearly 24,000 visits were made to the dedicated website www.m4newport.com between September and December 2013, equating to an average of almost 6,000 visits per month over this period.

Most participants provided online responses to the public consultation.

Key findings

The present transport network in, and around, Newport

While there was no consultation question inviting views on the existing network, many responses include comments reflecting on it, which are summarised here for completeness:

- Most criticise the existing infrastructure and highlight problems associated with it, with many specifically mentioning the Brynglas Tunnels as a focus for congestion when stressing the need for congestion alleviation;
- A few respondents suggest that congestion is caused by local traffic, driver behaviour, poor traffic regulation enforcement and poor traffic management;
- Some suggest that congestion is comparably worse in other parts of the UK, with some respondents suggesting that congestion is only an issue during peak hours;
- There are mixed views on the safety of the M4 and need for additional capacity;
- Some respondents highlight the link between the level of air and noise pollution to the congestion of the M4;
- A few respondents discuss the impact of the existing transport network on wildlife habitats and woodlands, stressing that these areas are also under threat from various industrial and commercial developments;
- Several stakeholders discuss the traffic growth projections provided. A few (mostly transport organisations) agree with these, while various others (including environmental groups) say they are inaccurate or do not adequately demonstrate the requirement for the proposals. Many respondents challenge the traffic growth projections, stating that they are based on out-of-date information and that they do not factor in improvements such as the electrification of the South Wales Mainline railway or the proposed Cardiff Capital Region Metro;
- Some respondents question how these proposals fit with the Welsh Government's positions on sustainable development and the environment;

- A few stakeholders express concern that this project might dominate the Welsh Government transport budget spend to the detriment of other important schemes; and
- Some suggest that accidents and consequent traffic jams are damaging the Welsh economy. A number of stakeholders believe local businesses and the economy are negatively impacted by congestion on the M4 around Newport, saying congestion and unreliable journey times can increase costs for businesses and hinder development in the region.

Black Route and its complementary measures

Of those respondents who discuss the problems and objectives for the M4 Corridor around Newport (goals), most suggest that the Black Route option would achieve, or largely achieve the goals and address the problems. The Black Route mainly follows the existing Preferred Route that is protected for planning purposes, as revised in 2006. Only a small number of respondents take the opposite view.

Many respondents think that it should be completed as soon as possible, that the scheduled date for delivery is too distant, or that a new section of motorway around Newport is long overdue.

Some respondents stress that junctions would help Newport to share in the economic benefits of the scheme, while others think there should be no, or a limited number of, junctions to prevent heavy use of the road by local traffic. Some respondents suggest modifications, stating that they would like the Black Route to be sited further away from Magor or that the route be elevated where it crosses the Gwent Levels.

Some raise concerns about the potential disruption to residents, businesses, the existing road network and the environment from the construction of the Black Route. Some respondents indicate that while they acknowledge the benefits of the Black Route, the disrupting impacts of construction bring them to oppose the route. Several respondents think that construction of the Black Route would be less disruptive than the construction of other options.

There are mixed views on the potential economic benefits of the Black Route option. Those who believe the option would provide economic benefits refer to the need for successful economies to have a high quality, reliable transport network and suggest that the existing M4 acts as a constraint on economic growth and job creation in Wales. Other respondents remark that the option would encourage inward investment and regeneration of Newport and enable better movement of goods. Those who dispute the economic benefits tend to suggest that it would act as a bypass to Newport. Some respondents express concern about the economic impacts on the Port of Newport and its docks. Some stakeholders register particular concern about the impact of the Black Route option's River Usk crossing, which they say would affect operation of docks and ports, ultimately resulting in trade moving to other ports.

Many are concerned that the option would affect communities such as Magor, Undy, St Brides and Duffryn. Some suggest that the Black Route would have a smaller impact on communities than the other proposed options, or that it adequately limits potential impacts. Several respondents are concerned about

potential devaluation of properties along the Black Route, in locations such as Castleton, Magor and Undy.

Many respondents express specific environmental concerns and highlight the possible negative impact on the Black Route option on the Gwent Levels, its protected or designated areas and their biodiversity, wildlife and habitat. Many respondents are concerned about the potential destruction of two areas of ancient woodland. Several stakeholders express concern about the Black Route option negatively affecting the landscape of Newport, South Wales and the Gwent Levels.

Comments include suggestions that the route could have environmental benefits, that it would have a lesser impact than other options and that the environmental impacts would not be significant. Respondents think the Black Route would result in a reduction of pollution, particularly for the north of Newport, and that it could reduce stress for road users. A few respondents suggest that the Black Route is the option with the least negative health impacts.

Many comments are made regarding the cost associated with this option, with most stating concern that it is too high or that the cost is unjustified during a period of recession and public sector funding cuts.

Red Route and its complementary measures

Some respondents argue that building a dual carriageway rather than a motorway is a compromise solution that would not have sufficient capacity to achieve the desired outcomes. Only a small number of respondents take the view that the Red Route option would achieve the goals and address the problems for the M4 Corridor around Newport. Most take the opposite view.

Many are concerned that this option would prove less effective than the Black Route or Purple Route options but still be at a comparable cost. Some respondents express concern about the Red Route's timescale for delivery and the proposal to complete the project in phases. Some stakeholders support a phased approach to construction if this helps Welsh Government manage their transport budget.

Many respondents state that a new road needs to be three lanes each way and of motorway grade. Specific concerns include bends that respondents perceive as unnecessary; whether the road needs to be raised where it crosses flood plains; and impact on existing buildings and infrastructure. Some respondents express concerns about the engineering challenges of building over a landfill site, or that the Red Route would be longer and less direct than other proposed options.

While a few state that the option would benefit the local economy, most believe that the local and/or Welsh economies would be negatively impacted. Some respondents express concern that the option could result in a loss of value to properties close to the outlined route in communities such as Duffryn and at proposed new developments such as at Glan Llyn. Some respondents are concerned that the business usage of particular parts of the city, including the Dock's Way Landfill site and the Newport docks area could be affected. Some respondents express concern that it would deter visitors, and damage tourist assets including Usk and the Gwent Levels, both during construction and after. Respondents also express concern about the Red Route's impact on farming.

Some stakeholders suggest that environmental and landscape impacts of the Red Route option would be minimal or lesser than other options. The most prevalent specific environmental concern of respondents is the potential impact of the Red Route on the Gwent Levels and its designated status, with some responses highlighting its wildlife habitats, reens and waterways and/or its beautiful historic landscape. Several respondents express concern that if this road is built, adjacent areas of the Gwent Levels would come under pressure from proposals for additional development alongside the road. A few respondents express concern that the Red Route might result in the loss of two areas of ancient woodland near Marshfield and near Duffryn.

A small number of respondents raise issues of visual, air and noise impacts on the community of Duffryn, and noise and light pollution on residential properties more generally. Of particular concern to some respondents is the proximity of the Red Route to Newport in general, or to specific parts such as Duffryn (including schools there) or the city centre, and the disruption to these areas it could cause. Some believe that this would reduce the quality of life of people in areas close to the route.

Purple Route and its complementary measures

Some respondents state that the potential benefits of the Purple Route do not outweigh the various negative impacts that they believe this route option would cause. Some respondents suggest that the Purple Route would be more expensive to build than the Black Route yet would deliver similar benefits.

Some respondents highlight the greater number and tightness of curves in the Purple Route, in comparison to the Black Route and some suggest that this could slow down traffic and increase the risk of accidents. A number of respondents compare it unfavourably to the Black Route, suggesting that it would be longer, slower and less direct.

Respondents often express concerns about the potential curtailment of land use around the docks area of Newport if the Purple Route is implemented, and some are concerned that it would negatively affect the operational capacity of the docks themselves. Some respondents refer more broadly to the area around Newport's docks, including the potential impact on redevelopment of the dock areas for commercial or residential purposes. Similarly, a few respondents raise concerns about the potential impact on the landfill site. A number of responses are concerned that the route could have an impact on proposed and potential future employment, housing and transport developments in the Newport area.

A few respondents suggest that the encroachment of the route on the Gwent Levels would result in a knock-on negative impact on the tourist industry of the area.

Several respondents are concerned that, by building the Purple Route, the area of the Gwent Levels situated alongside the route would become devalued and vulnerable to future infrastructural and commercial development. Respondents' specific concerns about the impacts on the Gwent Levels include potential damage to biodiversity, wildlife and habitat, ancient woodland, and wetlands and reens. Some respondents describe the damage the route would cause to the Gwent Levels as irreparable. A few respondents suggest that the impact on the Gwent Levels would be less with the Purple Route rather than the Black Route due to, for

example, the more northerly routing around Duffryn and through the Dock's Way Landfill Site. Another respondent is confident that wildlife would adapt.

A few respondents suggest that the Purple Route would introduce or significantly increase pollution in areas previously less affected.

The most significant social issue raised by respondents is the potential impact on the local community, in particular the proposed route's proximity to homes in the communities of Duffryn, Magor and Undy. Additionally, many are concerned about the disruption the route might cause and the impact it could have on the people of Newport and on peoples' quality of life. A number of comments state that the route would have a detrimental effect on recreation facilities and local amenities. Many respondents also express concern about the potential disruption during construction of the Purple Route, particularly where the Purple Route is situated close to communities such as Duffryn.

A few respondents suggest that the option would provide easier and quicker travel past Newport, therefore making it more viable for businesses to locate elsewhere in Wales or improve efficiency for those already in operation.

As with the Black Route option, some respondents state that a new section of motorway is long overdue and press for construction of the route to begin as soon as possible.

Do minimum scenario

Most suggest that the Do Minimum scenario would not achieve the goals or address the problems. Many believe that the Do Minimum Scenario would either worsen or not improve congestion.

Some respondents comment that using the existing network rather than building a new three-lane motorway would be insufficient to meet demand. Some respondents support improving signage on the M4 to encourage use of the A48.

Many respondents comment critically on the economic impacts of the Do Minimum Scenario. Some respondents suggest that the Do Minimum Scenario would not deliver any benefits for either the local or the wider Welsh economies. Some argue that the Do Minimum Scenario would actually worsen the economic situation.

Many respondents believe that this scenario would have the least impact on the environment, and in particular, on biodiversity, wildlife and habitat and the landscape of the Gwent Levels and its associated SSSIs.

Complementary measures

In their responses to the consultation, some respondents discuss the complementary measures included in the Black, Red and Purple route options, as referenced in the first three consultation questions.

A few stakeholders express support for the complementary measures in general because they believe they would improve accessibility, including to public transport facilities.

A handful of respondents express support for the complementary measure of reclassifying the M4 between Magor and Castleton, suggesting that this would have positive economic impacts and noting the further opportunity to reopen the

eastbound slip road at Caerleon Road. Other respondents oppose reclassifying the road, often suggesting that doing so would lead to more congested roads and longer journey times. Most of these respondents suggest both the existing motorway and a new route are needed to adequately alleviate traffic problems.

Many respondents support a new single carriageway link between the M48 and B4245, as laid out in the complementary measures.

Many respondents support the complementary measure of promoting cycling as an alternative to the car for journeys up to three miles, by providing or improving infrastructure. Several respondents argue that promoting cycling would reduce congestion and contribute to better health. In contrast, several other respondents express disagreement with providing cycling infrastructure, suggesting that this would not result in a modal shift or would not reduce traffic congestion.

Alternatives

In their responses to the consultation, some respondents discuss ideas for improving transport around Newport that are not part of the proposals put forward for consultation. These include alternative routes; traffic management, traffic demand management measures and other road improvements that could be used instead, or in addition to, the proposed routes; and alternative modes of transport, including public transport, walking and cycling.

Many believe that the existing major roads around the southern perimeter of Newport, namely the A4810 (Steelworks Access Road) and the A48 (Southern Distributor Road), could form the basis of a viable alternative to the Black, Red and Purple Routes, particularly if the roads were widened or upgraded. Similarly, a significant number of comments state their support for what is often described as the Blue Route. The Blue Route is the name of a specific set of upgrades to the A4810 and A48 proposed in the 'The Blue Route' report authored by Professor Stuart Cole, published on 7 December 2013 by the Institute of Welsh Affairs (IWA) and Chartered Institute of Logistics and Transport (CILT). Some interest groups have publicly endorsed this alternative and it has received a significant amount of publicity.

Many respondents suggest ways in which the current M4 motorway could be improved. For some respondents, these changes are advocated as a way of avoiding the need to build a new route. Some suggest banning lane changes as an alternative measure, believing this could address the safety issues on the M4. Others express more general support for better integrated traffic management as a method to better manage traffic flows, especially at peak periods.

Many express support for greater public transport provision. Respondents are often critical of the level of public transport provision currently available into, around and past Newport, with some suggesting that at present public transport is not a viable alternative to car use. Many respondents state that improving the public transport network could be successful in solving problems on the M4, such as congestion. A number of stakeholders, including local authorities, transport organisations, private sector organisations, and political organisations, express support for a South Wales, or South East Wales Metro project (more recently referred to as the Cardiff Capital Region Metro in Welsh Government publications) and indicate that the project offers an alternative to reduce congestion on the M4 and other roadways.

Some respondents discuss other strategies to reduce the number of vehicles using the M4.

All alternatives submitted during the consultation have been considered and are appraised in a Strategic Appraisal of Alternatives Report³, which accompanies this Consultation Participation Report.

Support and opposition

As outlined more fully in the methodology (see Section 2.7 of the Full Factual Report, Appendix A9), responses have only been coded with support and opposition codes if their support or opposition is explicitly stated in their response.

When considering this section it is important to remember that reported numbers may have been influenced by responses submitted as a result of interest groups' initiatives.

The key points to take from analysis of support, opposition and preference comments are:

- Respondents express a preference for the Black Route option over the two Reasonable Alternatives and Do Minimum scenario.
- More respondents express opposition than support for each option.

The Red Route attracts more comments of opposition than the others, whilst the Black Route attracts the most comments of support.

The public consultation has highlighted a number of economic, social and environmental issues to be taken into account as part of the development of a potential Plan for the M4 Corridor around Newport. Taking into account the assessments of the draft Plan, the participation process has highlighted that scheme level mitigation measures are welcomed and further encouraged at a scheme level of more detailed appraisal, helping mitigate any potential adverse impacts on the environment and particular groups of people.

Some alternatives have been suggested during the participation process and these, where appropriate, will be considered as part of the Welsh Government's decision making.

Overall, the participation process has demonstrated that the identified preferred strategy, comprising the Black Route and its complementary measures could be progressed.

Current situation and next steps

Taking into account the responses to this participation process, as well as the assessments of the draft Plan, the Welsh Government may decide to publish a Plan for the M4 Corridor around Newport. Alongside this Plan, the Welsh Government would publish updated strategy level reports⁴, including a SEA

³ M4 Corridor around Newport Strategic Appraisal of Alternatives Considered during draft Plan Consultation Report (July 2014). Available to download from www.m4newport.com

⁴ All published reports are available to download from www.m4newport.com

(Post Adoption) Statement, to demonstrate how the participation process has informed its decision making.

Following the potential adoption of a Plan for the M4 Corridor around Newport, the Welsh Government may announce a modification to the 2006 Preferred Route, which will protect a corridor for planning purposes. The Plan's measures would be developed at a scheme level of appraisal and subject to Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA). The proposed motorway scheme would likely be subject to a public local inquiry, which may be scheduled for 2016/2017. If successful, the Welsh Government would aim to start a three to four year construction period in Spring 2018.

All those who responded to the public consultation, attended an M4 Corridor around Newport stakeholder or public event, or who have responded to a previous associated consultation, have been offered the opportunity to provide contact details in order to be kept updated on the Welsh Government's decision making for the M4 Corridor around Newport. Those people and/or organisations will be notified if the draft Plan is adopted and a Plan for the M4 Corridor around Newport is published accordingly.

We thank all those who have contributed to the participation process.

1 Introduction

1.1 Context

Since the early 1990s, much assessment and consultation has been undertaken to develop a preferred solution to the problems on the motorway around Newport. A summary of previous work is provided below and a more detailed history is documented in the M4 Corridor around Newport WelTAG Stage 1 (Strategy Level) Appraisal Report⁵. The history of previous work associated with the M4 Corridor around Newport is outlined in Figure 1.2.

For many years, concerns have been raised regarding the potential for delays on the motorway and trunk road network in South Wales.

In March 1989, the then Secretary of State for Wales commissioned the South Wales Area Traffic Study (SWATS) to review traffic patterns over part of the trunk road network in South Wales in order to identify problem areas and propose possible solutions.

The SWATS Report (1990) identified the need for substantial improvement to the M4 to address a growing capacity issue on the motorway, in particular the section between Magor and Castleton.

As a consequence, a proposal for a relief road around Newport (which became known as the 'M4 Relief Road', and later, the 'New M4 Project' as a new dual 3-lane motorway to the south of Newport) was included in the Welsh Trunk Road Forward Programme in 1991. An M4 Relief Road Preferred Route was published in 1995 and amended in 1997.

In 2004, the then Minister for Economic Development and Transport reported on the outcome of his review of transport programmes, which were undertaken to ensure a strategic fit with: 'Wales: A Better Country' and the Wales Spatial Plan. One of the conclusions of the review was that additional capacity was still required on the M4 motorway in South East Wales, in order to reduce congestion, improve resilience and remove an obstacle to greater prosperity along the whole corridor through to Swansea and West Wales. In addition to widening the motorway north of Cardiff, the Minister announced proposals to develop a New M4 south of Newport between Magor and Castleton.

Following Ministerial Review in 2004, the New M4 Project was the subject of a thorough re-examination in order to ensure fit with policies at that time and to take account of physical and legislative changes.

⁵ Welsh Government, M4 Corridor around Newport, WelTAG Stage 1 (Strategy Level) Appraisal Report, Arup, June 2013

Three key activities were undertaken:

1. A re-examination of route corridors considering, in particular, the implications and consequences of legislative changes and physical developments within the original project study area;
2. A comprehensive review of the previously published M4 Relief Road Preferred Route; and
3. A Junction Strategy Review.

The conclusion of these studies confirmed the route to the south of Newport as the optimal solution to tackling the problems of congestion on the M4 corridor around Newport. Following the Preferred Route and Junction Strategy Review, a TR111 Notice⁶ (April 2006) was published to protect a revised route corridor. A series of public exhibitions were held in April and May 2006 to explain the changes to the public and other stakeholders with an interest in transport in South Wales.

1.1.1 M4 Corridor Enhancement Measures (M4 CEM) Programme

A written statement in July 2009, by the then Deputy First Minister Ieuan Wyn Jones, announced that the New M4 was not affordable. The statement, however, accepted “the need to urgently address safety and capacity issues on the existing route” through the introduction of “a range of measures”.

The M4 Corridor Enhancement Measures (CEM) Programme⁷ was therefore initiated by the Welsh Government and this aimed to create a package of measures to deal with resilience, safety and reliability issues within the M4 corridor between Magor and Castleton.

Under the M4 CEM Programme, a long list of possible solutions was explored. Packages that combined public transport, highway and other travel solutions were identified for appraisal. These included widening of the M4 between Junctions 24 and 29 as well as improvement to the existing road network to the south of the Newport city centre and a new dual carriageway all-purpose road to the south of Newport.

As part of the M4 CEM Programme, a comprehensive engagement process was launched in September 2010 culminating in a public consultation held between March and July 2012. During the engagement process, the Welsh Government and its project team engaged with both internal and external specialists and expert stakeholders. This process encompassed a diverse range of views and interests relating to transport in South Wales, as well as with people likely to be interested in and affected by any transport measures potentially adopted and implemented by Welsh Government.

⁶ Once a preferred route is announced, Welsh Government serves a statutory notice (TR111) on the local planning authorities requiring the line to be protected from development. This is enacted under Article 19 of The Town & Country Planning (Development Management Procedure) (Wales) Order 2012

⁷ Further details of the M4 CEM Programme and its evolution are available at www.m4cem.com

The consultation resulted in public support for the provision of an additional high quality road to the south of Newport⁸, supported by additional measures to address travel related problems within the M4 Corridor. These were referred to as Common Measures. They comprised a mix of network improvements, network management, demand management, alternative modes and smarter sustainable choices. The M4 CEM WelTAG Stage 1 (Strategy Level) Appraisal Report⁹ concluded that the following measures were worthy of further consideration:

- A new dual carriageway route to the south of Newport;
- Public transport enhancement; and
- Common measures.

1.1.2 M4 Corridor around Newport draft Plan

Initiatives, including discussions between the Welsh Government and HM Treasury/Department for Transport, as well as the work of the Silk Commission¹⁰, created potential funding opportunities for Welsh Government infrastructure projects. As a consequence, the decision was taken by the Welsh Government to further reconsider solutions to resolve transport related problems on the M4 around Newport.

Thus, in order to inform the strategy for the M4 Corridor around Newport, a further M4 Corridor around Newport WelTAG Stage 1 (Strategy Level) Appraisal¹¹ was undertaken of options that included M4 CEM measures, provision of new motorway capacity routed to the south of Newport and complementary measures. The options considered within the WelTAG Appraisal were as follows:

1. A new section of 3-lane motorway to the south of Newport following the protected (TR111) route (Black Route);
2. A new dual 2-lane all-purpose road to the south of Newport following an alignment that would allow it to be constructed in phases (Red Route);
3. A new section of 3-lane motorway to the south of Newport along a similar alignment to the all-purpose road (Purple Route);
4. Public transport measures; and
5. Complementary measures.

⁸ Welsh Government, M4 Corridor Enhancement Measures (M4 CEM), Participation Report, Arup, August 2013. Available to download from www.m4cem.com

⁹ Welsh Government, M4 Corridor Enhancement Measures (M4 CEM), WelTAG Stage 1 (Strategy Level) Appraisal Report, Arup, June 2013. Available to download from www.m4newport.com

¹⁰ The 'Silk' Commission on Devolution in Wales, which is reviewing the case for the devolution of fiscal powers and reviewing the powers of the National Assembly for Wales, March 2014. <http://commissionondevolutioninwales.independent.gov.uk/>

¹¹ Welsh Government, M4 Corridor around Newport, WelTAG Stage 1 (Strategy Level) Appraisal Report, Arup, June 2013. Available to download from www.m4newport.com

The M4 Corridor around Newport WelTAG Stage 1 (Strategy Level) Appraisal concluded that a new section of 3-lane motorway to the south of Newport following a protected (TR111) route, in addition to complementary measures, would best achieve the goals and address the problems of the M4 Corridor around Newport, and should be progressed for further appraisal.

These options subsequently formed the basis for the development of the draft Plan, which was subject to public consultation between September and December 2013. This outlined the Welsh Government's preferred strategy for addressing transport related problems identified on the M4 Corridor around Newport. In recognising the range of the transport planning objectives for the M4 Corridor around Newport, the preferred strategy combines both highway infrastructure and other demand management solutions.

The Welsh Government's preferred strategy for the M4 Corridor around Newport consists of:

- **A new three-lane section of motorway between Magor and Castleton to the south of Newport along the TR111 protected corridor of the Black Route; and**
- **Complementary measures (outlined in Table 1.1).**

The Welsh Government's preferred strategy comprises the construction of a new three-lane section of motorway mainly following the protected TR111 'Black Route', between Junctions 23 and 29, including a new crossing of the River Usk. The River Usk is designated as a Special Area of Conservation (SAC).

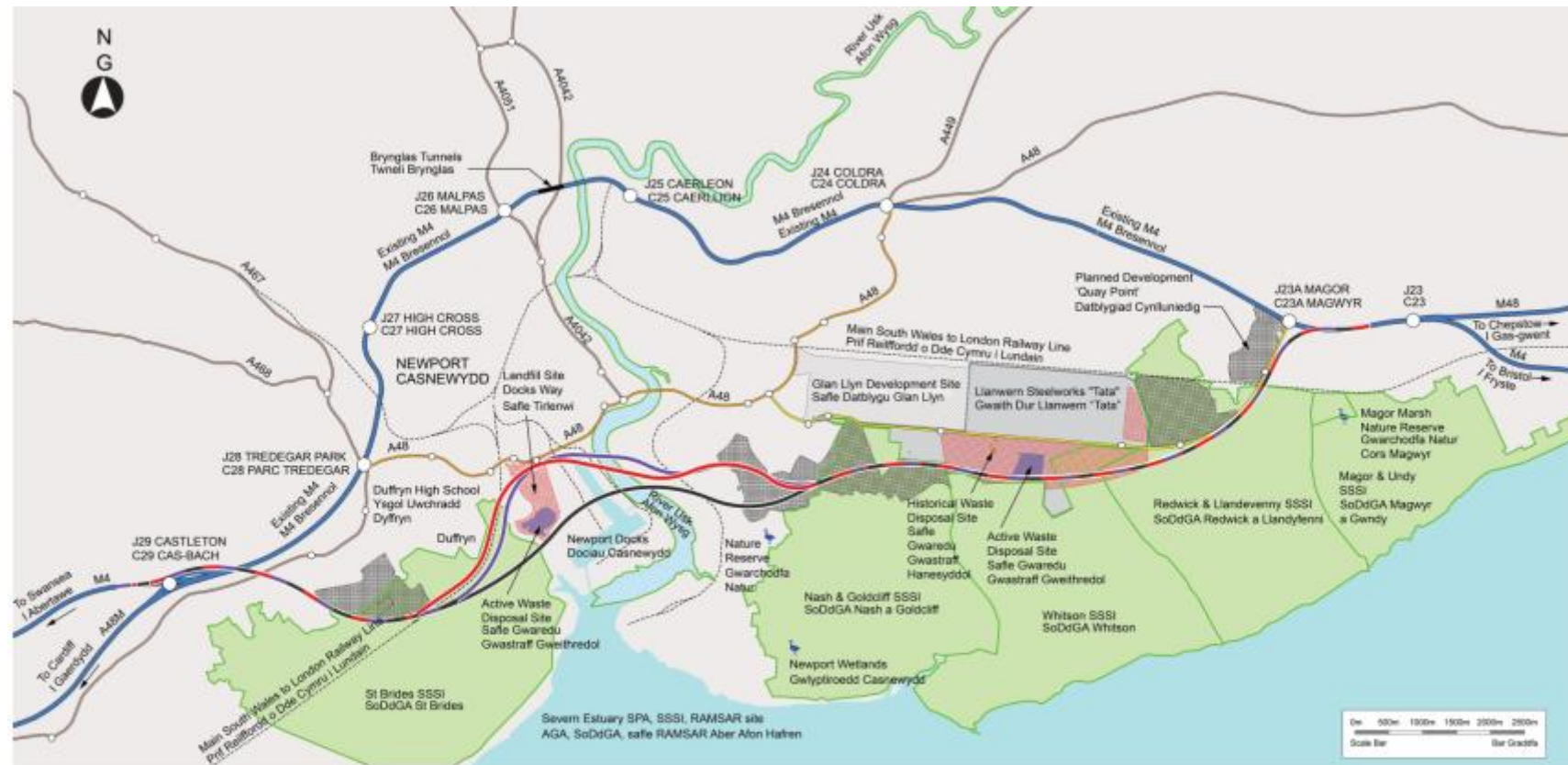
The Black, Red and Purple Routes are shown in Figure 1.1.

The TR111 route to the south of Newport has remained protected for planning purposes since April 2006. The alignment of the proposed new section of motorway has been developed following extensive consultation, investigation and analysis. The aim is to minimise the impact on the environment, whilst fully meeting current motorway design and safety standards. Minor changes to the alignment of the TR111 protected route could still be made, subject to further investigation.

A junction strategy is investigated as part of scheme development.

In addition to the new highway infrastructure, the Welsh Government recognises that there are additional complementary measures that could assist in alleviating travel related problems within the M4 Corridor around Newport. The complementary measures are as shown in Table 1.1.

Figure 1.1: Plan of the Black, Red and Purple Routes

**Legend | Allwedd**

- | | | |
|--|--|--|
| <ul style="list-style-type: none"> Black Route (the main element of the draft Plan)
Liwybr Du (y prif elfen y Cynllun drafft) Red Route (the main element to the 'reasonable alternative' to the draft Plan)
Liwybr Coch (y prif elfen i'r 'dewis amgen rhesymol' i'r Cynllun drafft) Purple Route (the main element to the 'reasonable alternative' to the draft Plan)
Liwybr Porffor (y prif elfen i'r 'dewis amgen rhesymol' i'r Cynllun drafft) | <ul style="list-style-type: none"> Newport Southern Distributor Road
Ffordd Ddosbarthu Ddeheuol Casnewydd Steelworks Access Road
Ffordd Fynediad i'r Gwaith Dur Existing Railway Lines
Linellau Rheilffordd Presennol | <ul style="list-style-type: none"> Employment Land Allocation from Newport Unitary Development Plan
Dyranïad Tir Cyfogaeth o Gynllun Datblygu Unedol Casnewydd Sites of Special Scientific Interest (SSSI)
Safleoedd o Ddiddordeb Gwyddonol Arbennig (SoDdGA) River Usk SAC and SSSI
ACA a SoDdGA Afon Wysg |
|--|--|--|

Table 1.1: Complementary measures

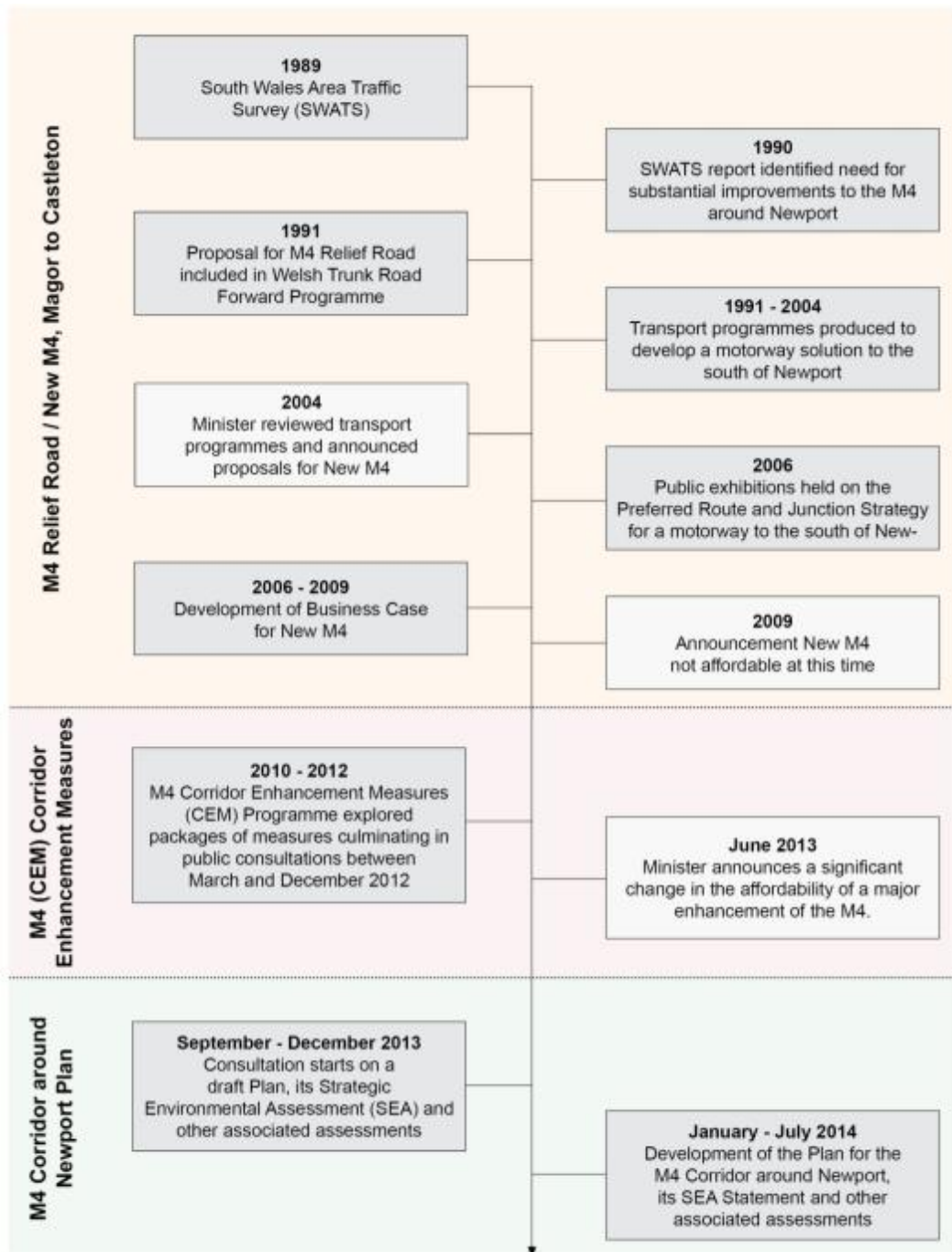
Complementary Measure	Description
Re-classify existing M4 between Magor and Castleton	Reclassification of the existing motorway as a trunk road could enable traffic management, safety and revised access arrangements.
M4/M48/B4245 Connection	A connection between the M4, M48 and B4245 would provide relief to Junction 23A and to the local road network. It would also provide improved access to proposed park and ride facilities at Severn Tunnel Junction.
Provide cycle friendly infrastructure	Promoting the use of cycling as an alternative to the car for journeys of up to three miles by providing new infrastructure or improving existing infrastructure.
Provide walking friendly infrastructure	Promoting the use of walking as an alternative to the car for journeys of up to three miles by providing new infrastructure or improving existing infrastructure.

The details of the above complementary measures will be developed as part of scheme development. They aim to maximise opportunities to complement the regional transport system, including proposals for the Cardiff Capital Region Metro.

The draft Plan also acknowledges that public transport enhancement will contribute to some of the objectives for the M4 Corridor around Newport. Studies during the draft Plan development identified that an increased use of public transport in the Newport area would not solve the problems on the M4 Corridor around Newport. Nevertheless, the Welsh Government recognises the importance of public transport improvements and a dedicated separate task group has been formed to take forward proposals to develop a Cardiff Capital Region Metro. Any plan for the M4 Corridor around Newport will be compatible with, and will complement, the Cardiff Capital Region Metro and the electrification of the rail network.

Responses to the draft Plan consultation are summarised within this Consultation Participation Report and have been used to finalise the associated environmental, health and equality assessments at the strategy level. Taking these into account, the Welsh Government will decide as to whether or not to adopt the draft Plan's preferred strategy, with or without amendments, and publish it within its Plan for the M4 Corridor around Newport.

Figure 1.2: History of the M4 Corridor around Newport



1.2 The wider transport planning process

Welsh Transport Planning and Appraisal Guidance (WelTAG)¹² aims to demonstrate that the principles of planning and appraisal are followed and provide an audit trail of decision making.

Stage 1 appraisal is required for strategies and is intended to screen and test options against the goals (Transport Planning Objectives) and the Welsh impact areas. Appraisal against the goals ensures that a transport proposal addresses the problems identified. It is also essential to appraise using the Welsh impact areas, because a proposal that performs poorly against Welsh impact areas (economic, social and environmental criteria) is unlikely to gain support from the Welsh Government.

In addition, Stage 1 includes a more detailed test for deliverability, risks (and how they are managed and mitigated) and the degree of support (from the public and other stakeholders).

WelTAG states that planners need to summarise the participation process as part of the development of a transport strategy, covering the following:

- The development of the participation strategy (objectives set, rationale for approach adopted);
- The activities undertaken in relation to the wider planning process;
- General findings;
- An explanation of how proposals have been modified in response to participants' contributions (any changes arising from participation would be included within WelTAG Stage 1 (Strategy Level) Appraisal Report); and
- A brief assessment of whether the participation conducted has achieved the objectives.

This document comprises the Consultation Participation Report, which informs the WelTAG process.

1.3 Structure

In light of the WelTAG requirements, this report is structured as follows:

- Chapter 2: Engagement and consultation;
- Chapter 3: Activities undertaken;
- Chapter 4: Summary of responses;
- Chapter 5: Consultation questions and analysis;
- Chapter 6: Strategic assessments;
- Chapter 7: Evaluation;
- Chapter 8: Next steps;
- Chapter 9: List of participants; and
- Chapter 10: Appendices

¹² WelTAG is a transport appraisal tool applicable to transport projects, plans and programmes in Wales. See <http://wales.gov.uk/topics/transport/publications/weltag/?lang=en>

2 Engagement and consultation

2.1 Participation

The National Transport Plan (2010) includes the Welsh Government commitment to explore a package of measures to deal with resilience, safety and reliability issues on the M4 around Newport. The Prioritised National Transport Plan (2011) reaffirms this commitment, including a public consultation on the Programme of measures.

Under the SEA Directive (2001/42/EC), SEA is a legal requirement for certain plans and programmes. In Wales, this is implemented through the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (referred to as the SEA Regulations in this report). Welsh Transport Planning and Appraisal Guidance (WelTAG) Appendix E.2 also outlines how the appraisal of transport strategies, plans or programmes should take into account the SEA Regulations.

WelTAG describes the SEA process in terms of five main stages and Stage D states a requirement to ‘consult on the draft Plan and the Environmental Report’.

Given the requirements outlined within the SEA Directive and WelTAG; the Welsh Government recognised the need to continue to undertake engagement with local people and stakeholders on their draft Plan and its associated assessments, which are:

- Strategic Environmental Assessment (SEA);
- Strategic Habitats Regulations Assessment (SHRA);
- Health Impact Assessment (HIA); and
- Equality Impact Assessment (EqIA).

The associated assessments consider the potential environmental, health and equality impacts of the draft Plan, its Reasonable Alternatives and the Do Minimum scenario. They are separate documents but were consulted on as part of the single draft Plan public consultation.

2.2 Engagement design, delivery and timing

During the engagement process, the Welsh Government and its project team ensured that all those who had expressed an interest in the M4 Corridor Enhancement Measures (M4 CEM) were aware of this consultation via email or letter. Similarly, a wide range of stakeholders who were likely to be interested in or affected by the proposals outlined in the draft Plan and its associated assessments, were also informed of the consultation. These encompassed a diverse range of views and recommendations relating to the draft Plan and its associated assessments. The main emphasis of the consultation was to undertake wide ranging engagement with stakeholders and local people, to help inform the Welsh Government’s decision making.

Throughout the engagement process, the Welsh Government attempted to keep everyone who had expressed an interest in the draft Plan public consultation informed, by maintaining the dedicated website www.m4newport.com. There was also a varied and comprehensive publicity campaign that built on that undertaken

for the M4 CEM Programme public consultation. This involved print media, service station advertising, radio and other advertisement media (see Section 3).

2.3 Approach to engagement and consultation

Between May and July 2013, the scope of engagement and consultation on a possible draft Plan was revisited and agreed between the Welsh Government and the wider project team, namely:

- Defining the purpose of the engagement process;
- Anticipating what people and stakeholders might want or need from the engagement process; and
- Considering how engagement could most effectively feed into determining the best possible strategy for addressing travel related problems on the M4 Corridor around Newport.

The overarching aims of the engagement process and strategy for the consultation were agreed in an Engagement Strategy and Consultation Strategy.

At a strategic level, the purpose of engaging with stakeholders was outlined within the Engagement Strategy¹³; to maintain regular communication with stakeholders, so that they were aware of how the Welsh Government was preparing and then consulting on a draft Plan and to gather views and information that could shape:

- Agreement on what the key problems and objectives are on the M4 Corridor around Newport;
- What measures were being considered as part of a draft Plan;
- The detail of how some measures, already committed to be implemented within the M4 Corridor around Newport, will be implemented; and
- How and when could a draft Plan be adopted with the preferred strategy (or Reasonable Alternatives) being progressed as projects up to their construction.

Under these high level engagement aims, other goals for engagement included to:

- Extract as much relevant local knowledge as possible;
- Utilise stakeholder expertise and knowledge to help prepare a draft Plan;
- Build shared understanding, across all sectors and stakeholders on potential solutions that will form part of a draft Plan.

The M4 Corridor around Newport Engagement Strategy was developed, to define the principles guiding the Welsh Government and the project team during the engagement process. It set out how participants and stakeholders could become involved in inputting into the M4 Corridor around Newport draft Plan. The engagement approach is described in more detail within the Engagement Strategy (Appendix A6).

¹³ M4 Corridor around Newport Engagement Strategy (May 2013)

The Consultation Strategy¹⁴ built on the Engagement Strategy to outline a strategy for consultation with stakeholders and public, aiming to:

- Provide stakeholders and public with useful, accurate, timely and user-friendly information;
- Maximise the opportunities for stakeholders and the public to be involved in the engagement and consultation process;
- Make it easy for stakeholders and the public to communicate with the project team and share their views on the draft Plan; and
- Ensure that the Welsh Government listens, responds and feeds back how stakeholder and public views have been taken into account in the decision making process.

To support the engagement and consultation process, an Arup M4 stakeholder data base, developed during the M4 CEM Programme was updated and used to help identify relevant organisations and individuals with an existing or potential interest in transport in South East Wales. When participating and/or responding to the consultation, stakeholders and the public were given the opportunity to provide their contact details so that they could be added to the database and be informed of any potential decisions for the M4 Corridor around Newport.

The approach to consultation is described in more detail within the Consultation Strategy (Appendix A7). These documents were produced as a reference primarily for the project team.

The engagement process and associated timescales are defined and described in a timeline, as shown in Table 2.1.

All available documents published as part of the engagement and consultation process associate with the M4 Corridor around Newport can be found at www.m4newport.com

¹⁴ M4 Corridor around Newport Consultation Strategy (July 2013)

Table 2.1: Engagement timetable

Time	What was set out to achieve	Action Taken
September 2010 – June 2013	Identify the problems, aims and goals for the M4 Corridor around Newport. Explore all possible measures that could be implemented to address the problems and achieve the goals of the M4 Corridor around Newport.	Taking forward the findings from the M4 CEM programme, these were used to inform the development of strategies for the draft Plan.
June - September 2013	On 26 June 2013 Minister for Economy, Science and Transport, published a written statement on behalf of the Welsh Government. Refining the preferred strategy and its alternatives for the draft Plan. Undertaking assessments of the draft Plan, its Reasonable Alternatives and the Do Minimum scenario. Highlight the forthcoming opportunity to participate in the M4 Corridor around Newport Consultation, open to all, encouraging people to comment on the draft Plan and its Reasonable Alternatives.	Programme team worked together to refine and assess the draft Plan and its alternatives, building on the results of the M4 CEM programme. Scoping of assessments was undertaken with statutory consultees.
September – December 2013	Understand people's views on; - how the draft Plan, its two Reasonable Alternatives and the Do- Minimum scenario address the problems and achieve the goals of the M4 Corridor around Newport. - the draft Plan's associated assessments.	Public consultation, open to all. Publicity, events, printed consultation document and online facility help people share their views.
January – June 2014	Process and analyse the results of the consultation. Taking into account the results of the consultation, review, finalise and report on the draft Plan and its associated assessments.	Undertake a review and finalise the Strategic Environmental Assessment, Health Impact Assessment, Equality Impact Assessment, and Strategic Habitats Regulations Assessment. Prepare a Consultation Participation Report. Feedback the results to the Welsh Government.
July 2014	Welsh Government to decide on the M4 Corridor around Newport Strategy. i.e. whether to adopt the published draft Plan with or without amendment taking into account the consultation responses.	The results of the public consultation and associated assessments are a key element of the decision making process. Should the draft Plan be adopted, then further engagement will take place in due course with local people and other interested parties on specific and detailed elements of any of the measures to be progressed.

The engagement (participation) strategy was planned in three principle stages:

- **Stage 1:** To take stock and develop a preferred strategy for the M4 Corridor around Newport, taking into account previous development work;
- **Stage 2:** Centred on establishing the proposed scope and level of detail required for the draft Plan's associated assessments and;
- **Stage 3:** Consisted of a public consultation, open to all asking the public and key stakeholders to comment on how the draft Plan and its Reasonable Alternatives address the problems and achieve the goals of the M4 Corridor around Newport.

The activities undertaken in relation to the three stages in described in more detail in Chapter 3. In summary, the engagement objective at Stage 1 was to take stock of previous development work, engagement and consultation results. Stage 2 was to seek comments from Statutory Consultees and/or relevant others on the proposed scope and level of detail for the draft Plan and its associated assessments. Informed by the scoping process and after preparing the draft Plan and its associated assessments, Stage 3 involved consulting formally on the draft Plan, its Reasonable Alternatives and the Do Minimum Scenario with the public and key stakeholders. This will enable the Welsh Government to decide whether to adopt the draft Plan, with or without amendments, taking into account the responses to draft Plan consultation.

The following chapter describes in more detail the engagement activities undertaken.

3 Activities undertaken

The M4 Corridor around Newport draft Plan involved public and stakeholder participation in three key stages, which were designed to feed directly into the technical work:

1. To take stock and develop a preferred strategy for the M4 Corridor around Newport, taking into account previous development work, including the results of previous stakeholder engagement and public consultation exercises;
2. To establish the proposed scope and level of detail required for the draft Plan's associated assessments; and
3. To ensure that Welsh Government's decision making process benefits from understanding the views of the public as well as key stakeholders, in order to adopt the most positive economic, social, environmental and technical solution for problems affecting travel on the M4 corridor between Magor and Castleton.

The consultation process aims to help the Welsh Government to decide whether to adopt the draft Plan, with or without amendments, taking into account the responses to the draft Plan and its associated assessments.

3.1 Stage 1

In the lead up to the Minister for Economy, Science and Transport's written statement on 26 June 2013 there had been a significant change in the assessment of the affordability of a major enhancement of the M4; Stage 1 involved taking stock of all the previous development work and associated assessments, and preparing a preferred strategy for the M4 Corridor around Newport, as well as identifying potential Reasonable Alternatives to that preferred strategy.

3.2 Stage 2

Closely associated to Stage 1, Stage 2 of the process centred on engagement with Statutory Consultees in order to establish the proposed scope and level of detail required for the draft Plan's associated environmental, health and equality assessments. Scoping Reports were issued to the statutory consultation bodies as defined by the relevant regulations and guidance in July 2013 and requested comments within a five week consultation period. The scoping responses were considered in the preparation of the assessments, contributing to the analysis of the key health, equality and environmental issues and policies.

3.3 Stage 3

Stage 3 of the process comprised a twelve week public consultation, open to all. Dialogue by Design, an independent specialist consultation practice, was commissioned to manage and report on the consultation process. The consultation asked participants to comment on what extent they thought the draft Plan, its Reasonable Alternatives, Do Minimum Scenario and associated assessments addressed the problems and achieved the goals (Transport Planning Objectives) of the M4 Corridor around Newport.

A Consultation Document, its associated assessments and single Response Form were published to help participants provide their comments. All stage 2 documents are available at www.m4newport.com.

In addition, workshops were held to discuss the Health Impact Assessment and the Equality Impact Assessment. Reports from these meetings can be found in Appendices A11 and A12 respectively.

A series of public drop-in exhibitions, advertised by a wide ranging publicity campaign, were held to encourage people to engage with the public consultation.

3.3.1 Promoting and Facilitating Consultation

Efforts were made to make as many people as possible across South Wales aware of the opportunity to engage and comment on the M4 Corridor around Newport draft Plan. The Minister for Economy, Science and Transport wrote to all AMs and MPs in the South Wales area informing them when the public consultation was starting and where they could obtain further information. All contacts on an Arup M4 stakeholder database (including over 1,500 individuals and organisations, including statutory consultees) were informed of the start of the consultation via email and/or letter. Various print media forms of publicity were also used to advertise to the public, the consultation and the various events being held throughout its period.

Publicity and events were aimed at a wide range of people, encompassing all possible interests, ages and socio-economic groups.

3.3.2 Publicity

A publicity campaign that built on lessons learnt from the M4 CEM consultation process included:

- The electronic distribution of a bilingual information leaflet to all Local Authorities, Clerks of Community Councils and the Arup M4 Stakeholder database. All contacts on the Arup M4 stakeholder database (over 1,500 individuals and organisations, including statutory consultees) were informed of the start of the consultation by email and/or letter.
- Paper copies of the bilingual leaflet were also sent to over 110,000 properties within the Newport area and areas of Monmouthshire, distributed by Royal Mail. Leaflets contained information about the purpose of the consultation and outlined how the public could get involved and share their views. The information also included the dates, times and locations of all the public drop-in exhibition events and document deposit point locations.
- To utilise existing public information distribution networks, adverts were placed in the Capital Times, Cardiff and South Wales Advertiser, Marshfield Mail, Newport Voice Magazine and the Big Issue Cymru.

Cardiff and South Wales Advertiser is distributed across South East Wales, Capital Times is distributed to households within Cardiff, Marshfield Mail is distributed to properties within the Marshfield area of Newport, Newport Voice Magazine is distributed to properties across Newport and the Big Issue Cymru is sold across Wales, with its biggest readership in South East Wales.

- Bilingual posters were displayed at motorway services along the M4 (Magor to Swansea) and at all Document Deposit Points. The service station posters were a combination of wash room panels and six sheet displays. Admedia stated that there were 64,260,000 Opportunities to See (OTS) and recall of 78% for the wash panels and a 1,470,000 OTS and 72% recall for the six sheet displays.
- A bilingual radio advertising campaign on Real Radio was run for the duration of the consultation. Real Radio has an audience reach of 531,000 adult listeners per week. The campaign targeted audiences primarily at peak times of the day (06.00-10.00 and 16.00-19.00) however during both the first and last two weeks of the consultation period, the campaign increased and also targeted listeners during the afternoon (13.00-16.00). The campaign included a text mechanic that allowed the listeners to text into the station to receive more information about the consultation. 36 texts were sent to the mechanic during the consultation period.
- A dedicated consultation website www.m4newport.com for the M4 Corridor around Newport went live from the 23 September 2013. Various tabs were included on the website, which provided key links to all consultation documents, the dates of drop-in exhibitions, FAQs and contact details.

The Welsh Government website¹⁵ provided a summary of the consultation and provided a link to the consultation website.

Dialogue by Design also hosted their own separate online consultation website, linked from www.m4newport.com, which allowed for the completion and processing of online response forms.

The M4 CEM website www.m4cem.com remains available and provides a link on its home page to the current M4 website.

During the consultation period from September-December 2013 www.m4newport.com received nearly 24,000 hits.

- A dedicated telephone hotline and email address was provided and advertised on publicity material, as well as on the website.
- In order to monitor external discussions associated with the consultation, identified interest group's websites and relevant media publications were checked on a regular basis. A sample is provided at Appendix A4.

3.3.3 Events

The consultation campaign included:

- Ten Public Drop-in Exhibitions held between October and November 2013 (see Table 3.1). Exhibition boards were displayed and members of the project team, including technical experts, were available to answer any questions and explain how the public could express their opinions formally.

In total, 1,234 people attended the public Drop-in Exhibitions and of this less than ten identified themselves to the project team as Welsh speakers. A Welsh speaker was available at all the drop-in exhibition events, as well as both English and Welsh language copies of the draft Plan documents.

¹⁵ <http://wales.gov.uk/consultations/transport/m4cor/?lang=en>

Table 3.1: Public Drop-in Exhibitions

Date	Time	Location	Venue	Attendance
Wed 2 October	12-7pm	Magor	Ebenezer Baptist Church NP26 3HY	280
Thu 3 October				207
Tue 8 October	12-7pm	Newport Centre	The Newport Centre NP20 1UH	109
Wed 9 October				87
Tue 15 October	12-7pm	Brynglas	All Saints Church NP20 5QY	78
Wed 16 October				55
Tue 29 October	12-7pm	Castleton	Village Hall CF3 2UW	127
Wed 30 October				167
Mon 25 November	12-7pm	Newport Centre	The Newport Centre NP20 1UH	59
Tue 26 November				65

- Seven Document Deposit Points were operational for the duration of the consultation period. At each deposit point, three copies of each document plus response forms were made available to view or take away at the following locations:
 - Caldicot One Stop Shop, NP26 5DB;
 - Castleton Village Hall, CF3 2UW;
 - Liswerry Post Office, NP19 0JX;
 - Magor Post Office, NP26 3EP;
 - Newport Central Library, NP20 1PA;
 - Newport Information Station, NP20 4AX; and
 - Welsh Government, Cathays Park, CF10 3NQ.

The documents which were available at the deposit points were:

- draft Plan Consultation Document;
- Response Form;
- Strategic Environmental Assessment (SEA) Environmental Report;
- SEA Non-Technical Summary;
- Consideration of the options in relation to the requirements of the Habitats Regulations Report;
- draft Plan Health Impact Assessment (HIA) Report; and
- draft Plan Equality Impact Assessment (EqIA) Report.
- A Health Impact Assessment (HIA) workshop was undertaken with invited stakeholders at the Urdd Hall, Cardiff, on 12 November 2013. Those invited were considered by the Welsh Government to represent relevant and appropriate organisations to help shape the HIA. During the workshop a presentation was given by representatives from Welsh Government and Arup, to explain the background to the draft Plan, outline the consultation process, and the HIA scoping process including its adopted methodology and appraisal criteria.

Two tasks were also undertaken and these provided the stakeholders with the opportunity to provide comments on the adopted HIA methodology and the appraisal undertaken for each of the health impact criteria and WelTAG criteria associated with health. The results of the workshop can be found in the HIA Workshop Report (Appendix A11).

- A number of Equality Impact Assessment (EqIA) telephone interviews were undertaken with key stakeholders on the 12 November 2013 at Arup, Cardiff. Those interviewed were considered by Welsh Government to represent relevant and appropriate organisations to help shape the EqIA. The interviews aimed to explore the views of the organisations in relation to the draft Plan's EqIA consultation document.
- An Equality Impact Assessment (EqIA) workshop was undertaken with stakeholders at Victoria House, Newport, on 10 December 2013. The organisations presented to, were considered by the Welsh Government to represent relevant and appropriate organisations to help shape the EqIA. During the workshop a presentation was given by representatives from Welsh Government and Arup, to explain the background of the draft Plan, outline the consultation process and the EqIA scoping process including its adopted methodology and appraisal criteria.

Stakeholders were provided with the opportunity to comment on the adopted EqIA methodology and the appraisal undertaken for each of the equality impact criteria and WelTAG criteria associated with equality.

The results of the workshop and telephone interviews can be found in the EqIA Workshop Report (Appendix A12).

- The National Assembly for Wales' Environmental and Sustainability Committee held an inquiry evidence session on 6 November 2013. The purpose of the inquiry was to consider "whether the current Welsh Government proposals in relation to the M4, and the process to date, have effectively balanced economic and environmental needs and interests." During the initial inquiry session evidence was presented by a range of stakeholders including environmental groups, Professor Stuart Cole, Natural Resources Wales and the Institution of Civil Engineers (ICE).

Further to the initial evidence session, the committee invited Welsh Government and a number of other supportive stakeholders to provide evidence at further committee meetings to seek clarity and build on previous evidence presented. The Welsh Government has submitted written evidence and responses to queries to the committee as part of its on-going inquiry.

Should there be any announcement as a result of the inquiry, this would be published on the National Assembly for Wales website.

<http://www.assemblywales.org/>

4 Summary of Responses

4.1 Managing Responses

To encourage participation from as many people as possible, formal representations were accepted through a variety of channels including:

- Completed paper copies of response forms that were made available at the public exhibitions (with freepost envelopes provided) and Document Deposit Centres;
- Online / electronically submitted response forms;
- Letters submitted via freepost address;
- Email via the dedicated address (m4newport@arup.com); and
- Letters or email directly submitted to the Welsh Government or Welsh Ministers.

When letters or emails were received, a timely reply was sent that thanked the respondents for their response and informed them that it would be included as part of the consultation exercise, however, it also encouraged them to formally respond with an additional response to the consultation questions if they had not done so.

More than 1,200 people attended an M4 Corridor around Newport event, at which members of the project team were available to discuss the consultation. Visitors were informed that they needed to submit a formal response to the consultation for their views to be captured fully.

Nearly 24,000 visits were made to the dedicated website www.m4newport.com during the public consultation period between September and 1 December 2013, equating to an average of almost 6,000 visits per month. The website encouraged visitors to respond to the consultation.

All correspondence received either by Welsh Government or Arup was processed and stored using a Communication Register and dedicated filing areas, which were then sent directly to Dialogue by Design for analysis and inclusion in their Full Factual Report (see Appendix A1).

4.2 Responses

After processing, a total of 1,864 responses were analysed. Of these, 48 were identified as ancillary submissions from respondents who sent more than one response. The total number of unique respondents participating in the consultation was 1,816.

Participants included members of the public as well as a range of organisations; some of which represented Welsh communities, economic, environmental and transport interests. For this consultation, 677 responses were received from individuals who used a template developed by the Woodland Trust. Of these, 478 were identified as identical, while 199 displayed some variation on the template response, and so were analysed slightly differently.

A submission was identified as part of an organised response when 20 or more identical responses were received.

The Woodland Trust was not the only interest group to see supporters echoing views that they published during the draft Plan public consultation. Other groups whose public statements, including templates and guides for responses, have been referred to or quoted from in (individual) respondents' submissions include:

- The Campaign Against the Levels Motorway (CALM);
- The Royal Society for the Protection of Birds (RSPB);
- Friends of the Earth (FoE); and
- Wildlife Trusts Wales

Furthermore there are several responses that refer to an alternative to the draft Plan suggested by the Institute of Welsh Affairs (IWA) and the Chartered Institute of Logistics and Transport (CILT) 'The Blue Route' paper, authored by Professor Stuart Cole. The suggested alternative is commonly referred to as 'the Blue Route', and is a suggestion that received considerable media attention during the consultation. In some responses this suggested alternative is described as an option to upgrade the Newport A48 Southern Distributor Road and A4810 Steelworks Access Road, or similar.

While it is apparent that the opinions of these interest groups, and possibly others, have influenced responses, this is not often explicitly acknowledged by respondents, making it difficult to specify precisely which responses, or how many, originate from interest groups' initiatives (other than the Woodland Trust template).

As no instances of 20 or more identical submissions were identified beyond the Woodland Trust template response discussed above, no further submissions were categorised as part of an organised response, as is common practice for consultations of this nature. Analysis does however suggest that at least 200 further submissions contain statements that resemble those publicly expressed by interest groups. While these have not been specified as organised submissions, they have a similar impact on the analysis findings and the numbers contained in Chapter 5 of this report.

In all likelihood many more individual responses may have been influenced by information or opinions available in the public domain during the consultation. However, this does not necessarily mean that an individual wishes to be considered part of a 'campaign', but rather they may agree with opinions shared by interest groups. This is common for public consultations and does not affect the validity of responses; similarly, organised submissions are no less valid than individual submissions. As the consultation is not a vote, this report contains reminders advocating caution when considering numbers.

Figure 4.1 below shows the number of responses received in the various response types.

Figure 4.1 Consultation responses by type

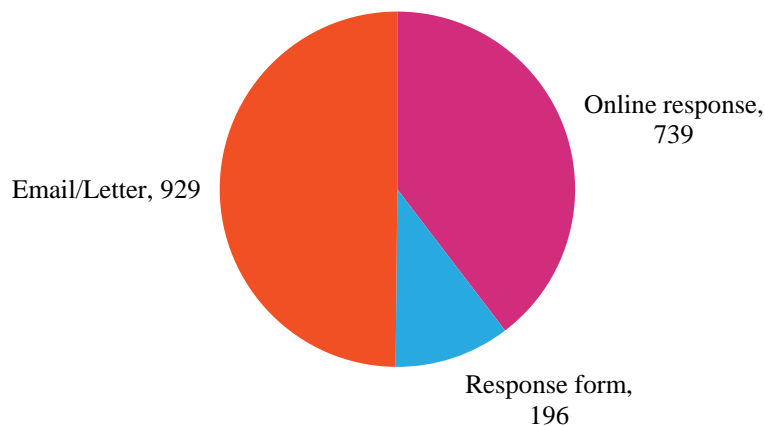


Table 4.1 shows the number of responses from key stakeholders and members of the public and other organisations who responded.

Table 4.1: Responses by respondent type

Response type	Count
Members of the public and organisations not identified as key stakeholders	1,779
Key stakeholders	85

The Welsh Government analysed all comments, equally. All participants are listed at the end of this report.

4.2.1 Submissions by key stakeholders

A full listing of the key stakeholders who responded to the Consultation is provided in Table 4.2.

Key stakeholders were considered to be organisations that have a strategic interest and/or detailed experience of addressing travel related issues in South Wales, and/or represent the environment, community or economy of South Wales.

A review of the comments provided by key stakeholders is presented in Section 5.2.

Some stakeholders also contributed to the public consultation by attending either the HIA or EqIA workshops held in Cardiff and Newport, as identified in Table 4.3. As strongly communicated at the time; deliberations and comments made by workshop participants were not analysed as formal consultation responses, but notes made at workshops and plenary discussions were recorded and published to inform the development of relevant assessments and serve as an aide memoire to participants wishing to draw on them for their own purposes.

Table 4.2 Listing of the key stakeholders who responded

Statutory environmental bodies		
Cadw	Natural England	Natural Resources Wales
Local Authorities		
Cardiff Council	Monmouthshire County Council	Newport City Council
Torfaen County Borough Council		
Town and Community Councils		
Goldcliff Community Council	Magor with Undy Community Council	Marshfield Community Council
Nash Community Council		
Other public sector and community organisations		
Association of Police Officers Cymru	Health and Safety Executive	Newport Civic Society
NHS Wales HIA Support Unit	Public Health Wales	South Wales Fire and Rescue Service
The Coal Authority		
Voluntary sector (environmental and civil society) organisations		
Age Cymru	Amphibian and Reptile Conservation Trust	Buglife - The Invertebrate Conservation Trust
Campaign Against the Levels Motorway (CALM)	Campaign for the Protection of Rural Wales	Chepstow Friends of the Earth
Church Action for Sustaining the Environment	Chwarae Teg	Friends of the Earth Cymru
Gwent Wildlife Trust	Newport Friends of the Earth	Ramblers Cymru
Royal Society for the Protection of Birds (RSPB)	Royal Society for the Protection of Birds (RSPB) North Wales Local Group	South East Wales Regional Equality Council
South Wales Mammal Group	The Woodland Trust	Torfaen Friends of the Earth
Valleys Bat Group	Wildlife and Countryside Service	Wildlife Trust Wales
Ymddiriedolaeth Genedlaethol / National Trust		

Private sector, business and regeneration		
Associated British Ports (ABP) South Wales	Confederation of British Industry (CBI)	Federation of Small Businesses (FSB) Wales
Island Steel UK	National Grid	Orb Electrical Steel
St Modwen Properties PLC	Tata Steel (submitted by GVA Grimley)	W E Dowds Shipping Ltd
Transport organisations		
Act Travelwise	Automobile Association (AA)	Campaign for Better Transport
Chartered Institute of Logistics and Transport	CTC Cymru - The National Cycling Charity	Freight Transport Association
Institution of Civil Engineers (ICE) Wales Cymru	Magor Action Group on Rail	Monmouthshire Local Access Forum
Network Rail	Network Rail Infrastructure Ltd	Newport Harbour Commissioners
Newport Local Access Forum	RAC Foundation	Road Haulage Association
Severn Tunnel Action Group (STAG)	South East Wales Transport Alliance (SEWTA)	South Wales Branch-Chartered Institute of Highways and Transportation
South Wales Trunk Road Agency	South West Wales Integrated Transport Consortium (SWWITCH)	Sustrans Cymru
Political organisation/individual		
Newport Liberal Democrats	Plaid Cymru Group on Torfaen Council	Wales Green Party
Welsh Liberal Democrats		
MP and AMs		
Jessica Morden MP (Newport East)	Bethan Jenkins AM (South Wales West Region)	Lindsay Whittle AM (South Wales East Region)

Table 4.3: Key stakeholder participating in HIA and EqIA Workshops

Attended HIA Workshop (November 2013)	Attended EqIA Workshop (December 2013)
Wales Health Impact Assessment Support Unit	SEWREC (South East Wales Regional Equality Council)
Public Health Wales	Public Health Wales Screening Services
Newport Public Health Team	Kaleidoscope Project/The Voice
Newport City Council Environmental Health	Learning Disabilities Health Liaison Nurse Team, Aneurin Bevan Health Board
Newport City Council Planning	Senior Public Health Practitioner, Public Health Wales
Rhondda Cynon Taff County Borough Council Transport	Fairer Futures, Welsh Government
Cardiff Council Transport	Student, University of South Wales
Monmouthshire County Council Transport	Chair of MECHANIC and Principal Public Health Practitioner, Public Health Wales
	Equality and Diversity Lead Midwife, ABHB Maternity Department
	GEMS (Gwent Education Multi-Ethnic Service)
	Gwent Police
	Senior Dietitian, Aneurin Bevan Health Board
	Learning Disabilities Health Liaison Nurse Team, Aneurin Bevan Health Board
	THT (Terrance Higgins Trust)
	Community Engagement Services Operation Manager
	New Link Wales
	Red Cross, Asylum Seekers Project
	Health and Wellbeing – Gwent Association of Voluntary Organisations

4.3 Travel Habits

Respondents who submitted responses using the consultation questionnaire or the consultation website were asked to provide further information about themselves, including questions about their travel habits. These responses are summarised in this section; other demographic data gathered is presented in the Full Factual Report Appendix A1.

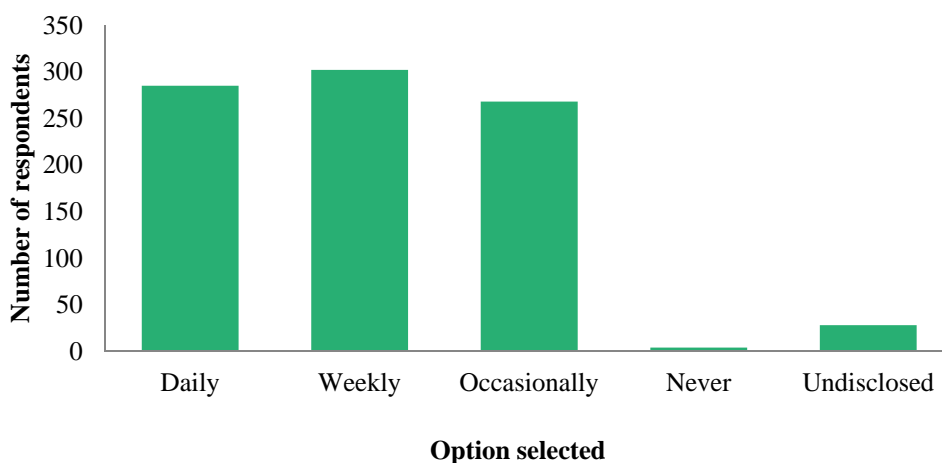
Questions about participants' travel habits were used to help understand participants' perspectives and concerns. They were not used to add weighting to any responses received.

A number of respondents registered on the consultation website but did not submit a response to the consultation questions. Any demographic and travel habit data they provided in that initial registration process has been disregarded.

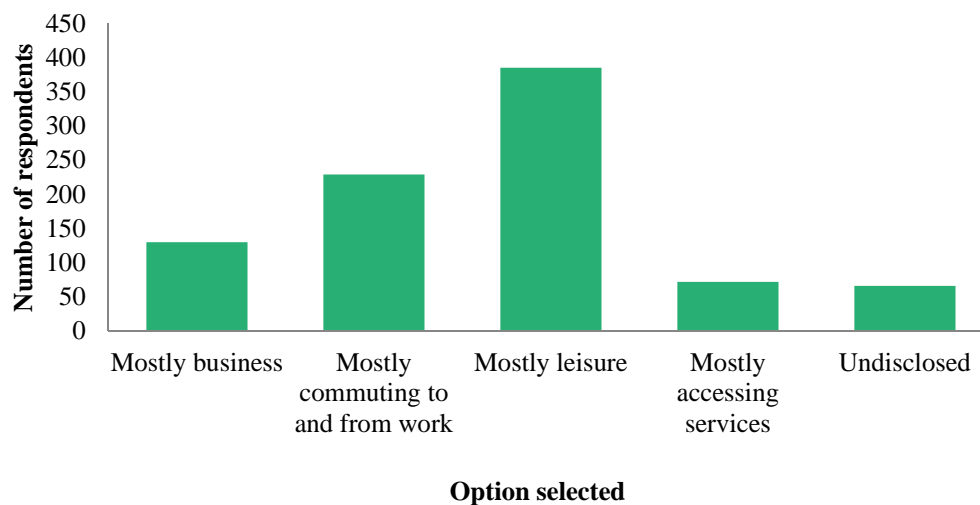
Figures 4.2 to 4.5 only include respondents who completed a response form or submitted their response via the consultation website. All other respondents, who did not provide responses about their travel habits, are excluded from these totals.

Respondents were first asked how often they used the M4 motorway around Newport, and could only select one response (Figure 4.2). Of those respondents who selected an option, four respondents indicated they never use the M4 motorway around Newport. Of the respondents who indicated they do use the M4, 284 respondents indicate they use the motorway daily; 301 respondents indicate they use it weekly; and approximately 267 respondents indicate they use it occasionally. 28 respondents did not disclose how often they used the M4.

Figure 4.2: Which of the following best describes how often you use the M4 motorway around Newport?



Respondents were also asked for what purposes they generally used the M4 motorway around Newport for these journeys, and could only select one response (Figure 4.3). Of those respondents who selected an option, 129 respondents indicated that the purpose of these journeys was mostly business, while 228 respondents indicated commuting to and from work. 384 respondents indicated that the purpose of these journeys was mostly leisure and 72 respondents indicated mostly accessing services. 66 respondents did not disclose a journey purpose.

Figure 4.3: Generally, how would you best describe the purpose of these journeys?

These trends were analysed to identify common travel habits, linked to respondents' postcodes, when provided, and this analysis can be found in Appendix A15. In summary, the majority of respondents resided in the Newport area, with other large concentrations in Cardiff and Monmouthshire.

The majority of participants who use the M4 between Magor and Castleton on a daily basis were located around Newport, Monmouthshire, Torfaen, Rhondda Cynon Taf and Cardiff (Figure 4.4). Respondents who generally use the M4 to commute also reside in those same areas, while those who more commonly use the M4 for business purposes reside in the Vale of Glamorgan, West Wales, Caerphilly or Cardiff (Figure 4.5).

Figure 4.4: User travel habits (Use)

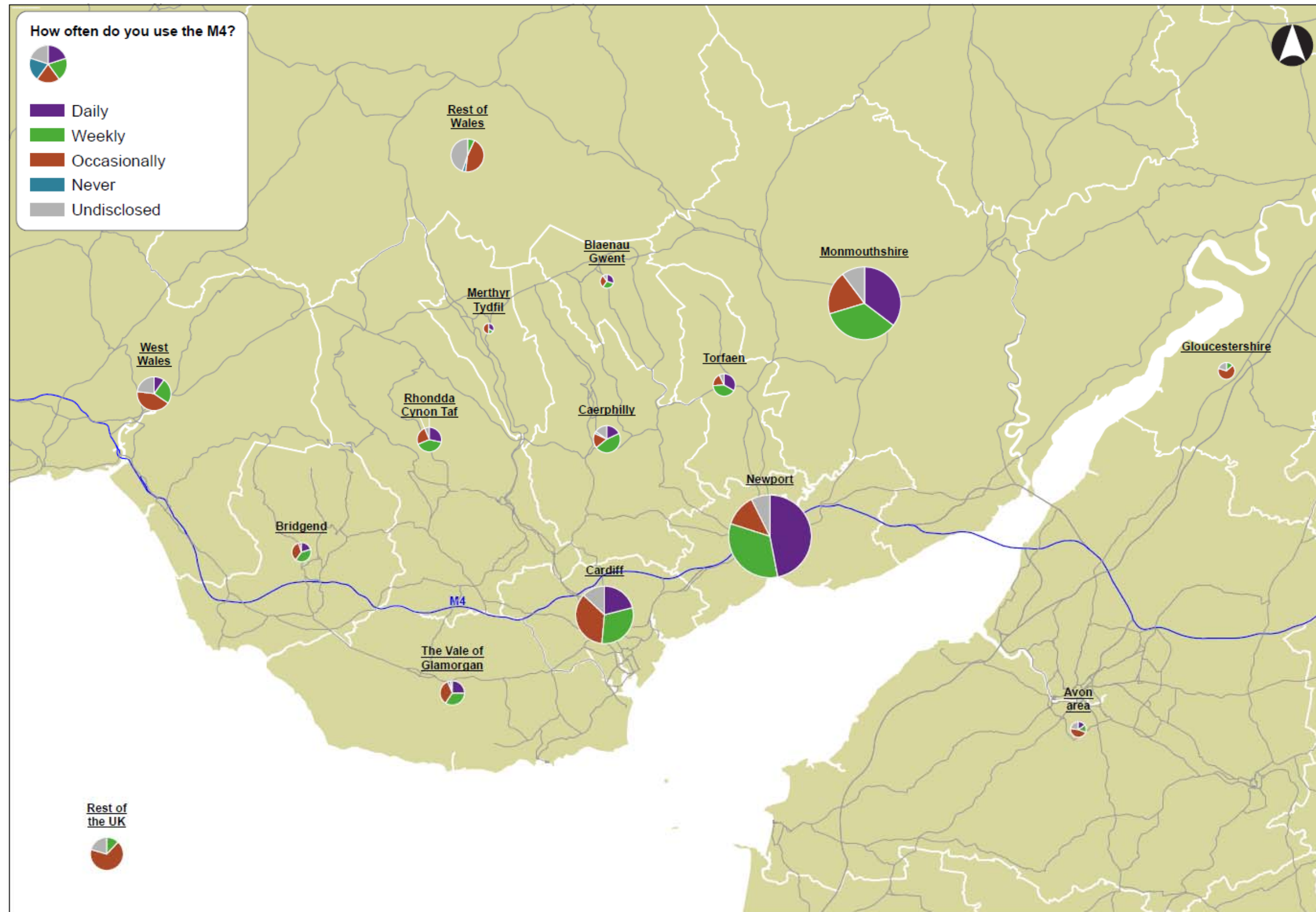
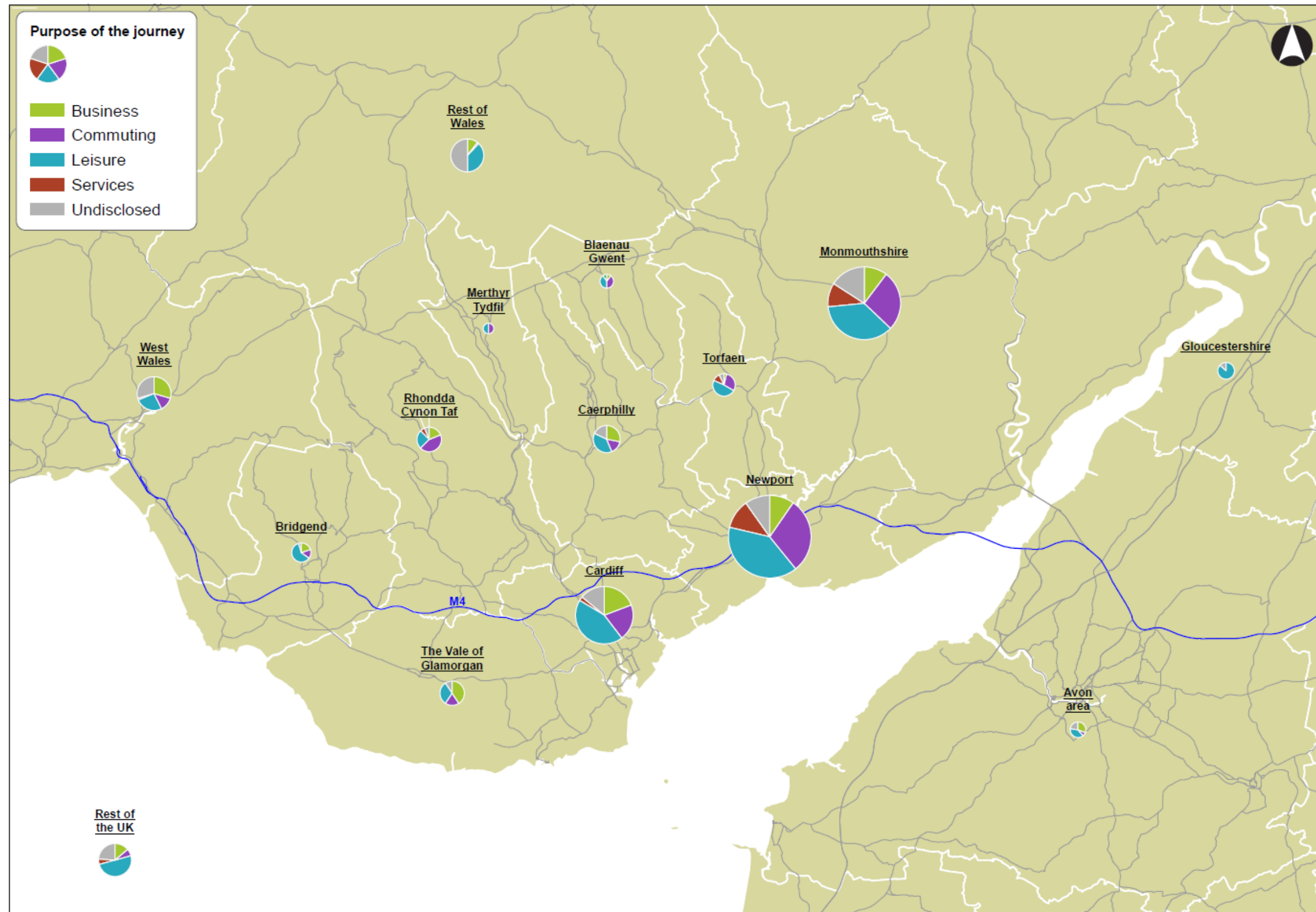


Figure 4.5: User travel habits (Purpose)



5 Consultation questions and analysis

The consultation questions posed within the Consultation Document comprised:

Preferred Strategy and Reasonable Alternatives

- Question 1. Please provide any comments regarding the **draft Plan (Black Route and its complementary measures)** here. In particular, to what extent do you think that it will address the problems and achieve the goals of the M4 Corridor around Newport?
- Question 2. Please provide any comments regarding the **Red Route and its complementary measures** (a Reasonable Alternative to the draft Plan) here. In particular, to what extent do you think that it will address the problems and achieve the goals of the M4 Corridor around Newport?
- Question 3. Please provide any comments regarding the **Purple Route and its complementary measures** (a Reasonable Alternative to the draft Plan) here. In particular, to what extent do you think that it will address the problems and achieve the goals of the M4 Corridor around Newport?
- Question 4. Please provide any comments regarding the **‘Do Minimum Scenario’** here. In particular, to what extent do you think that it will address the problems and achieve the goals of the M4 Corridor around Newport?

Associated Assessments

- Question 5. Please provide any comments regarding the **Strategic Environmental Assessment (SEA)** of the draft Plan here.
- Question 6. Please provide any comments regarding the **Habitats Regulations Assessment (HRA)** of the draft Plan here.
- Question 7. Please provide any comments regarding the **Health Impact Assessment** of the draft Plan here.
- Question 8. Please provide any comments regarding the **Equality Impact Assessment** of the draft Plan here.

Additional Comments

- Question 9. Please provide any additional comments here.

A full account of comments is provided in the Full Factual Report (Appendix A1).

5.1 Representations from members of the public and other organisations

This section summarises responses received from members of the public and organisations not categorised as key stakeholders by the Welsh Government in response to the M4 Corridor around Newport draft Plan consultation. A fuller report of responses can be found in the Full Factual Report prepared by Dialogue by Design, included in Appendix A1. Chapter 9 provides more information on who responded to the consultation, including organisations.

Many respondents provide general comments in response to the consultation that do not address a specific aspect of the Welsh Government's proposals, or are repeated for the three route options. These comments are summarised in this section along with other detailed comments on specific aspects of each proposal.

It is important to note that reported numbers in this section may have been influenced by responses submitted as a result of interest groups' initiatives. Please see section 4.2 for more detail on organised responses.

5.1.1 The present transport network in, and around, Newport

This section provides a summary of comments on the present transport network in and around Newport. While there was no consultation question inviting views on the existing network, many responses include comments reflecting on it, which are summarised here for completeness.

Further information on the transport network can be found in the WelTAG Stage 1 (Strategy Level) Appraisal Report available at www.m4newport.com.

Congestion on and capacity of the present transport network

About 170 respondents make comments regarding the congestion on roads in and surrounding Newport.

"I have lost count of the number of wasted business and leisure hours on the M4 and witness (almost) daily incidents due to the density of the traffic during the morning and evening rush hours."

Some respondents mention specific areas, roads or sections that they regard as particularly congested. These include the road between Coldra roundabout and the Brynglas Tunnels, the A4232, roads between Newport and Caerleon, and the current M4 corridor between Junctions 24 and 29.

A number of respondents specifically mention the Brynglas Tunnels as a focus for congestion when stressing the need for congestion alleviation. Some respondents, in contrast, suggest that the proposals would not alleviate congestion in the Brynglas Tunnels.

"Solutions to the congestion experienced on the M4 around Newport, particularly around the Brynglas tunnels, can therefore only be considered as part of a wider strategy which seeks to address the root causes of this congestion, and offers sustainable, responsible solutions."

In addition to traffic volume, some respondents identify specific causes of current congestion. A few respondents suggest that congestion is caused by local traffic,

while others suggest driver behaviour as a key cause of congestion, sometimes suggesting that poor traffic regulation enforcement leads to this delay-inducing behaviour. Others believe, more generically, that poor traffic management is to blame.

“Delays are preventably [sic] caused by stupidity of one sort or another, by individuals who know they are breaking the rules, but there are no incentives (or penalties) to create the desirable [sic] alternative to motorway madness.”

Some respondents believe that congestion is minimal or overstated. They say, for example, that traffic flows freely around Newport and throughout southeast Wales; or argue that they do not often encounter congestion, despite using the M4 regularly. Others suggest that congestion is comparably worse in other parts of the UK. One respondent says that traffic volume has not increased in recent years.

Other respondents highlight that congestion is only an issue during peak hours, and that outside this time the traffic on the existing M4 is generally acceptable. Some suggest this as a reason to oppose the proposals, while others suggest that peak hours are the most important time to alleviate congestion.

“I rarely get stuck in traffic, in and around Newport on the M4 despite using it daily for work.”

A few respondents mention the capacity of the existing road network, often in relation to perceived congestion. Some of these respondents state that they recognise the need for additional capacity, while one respondent suggests that the need for more capacity is minimal. Another respondent suggests that the new bypass through Llanwern Steelworks provides sufficient relief in the event of congestion on or closure of the current M4. One respondent suggests that more motorists need to be made aware of this ‘relief road’.

“The knock-on effect of M4 congestion is that feeder roads such as the A467 become virtually impassable for large periods of the day...At peak use times when congestion on the M4 occurs, drivers attempt to use local roads resulting in those routes becoming congested as well. Effectively, there is no real alternative to the current M4 if it becomes congested.”

A few respondents discuss speed limits in relation to the present transport network. There are comments suggesting that reduced speeds have a negative effect on congestion and capacity as well as comments arguing the opposite, saying that changing the speed limit has had a positive impact on traffic flow and capacity.

Infrastructure of the present transport network

About 145 respondents discuss infrastructure issues relating to the existing transport network. Approximately 20 respondents suggest that the existing infrastructure of the M4 is adequate, often expressing a belief that the harm caused by building a new road would outweigh the benefits. In contrast, about 15 respondents say that the existing infrastructure is inadequate, with some arguing that this has been the case for a considerable time.

Several respondents specify perceived inadequacies in the current infrastructure in the Newport area including a perceived lack of signage, the perceived unfairness of the tolling system for Severn crossings, and suggestions that there are too many junctions or too many traffic lights.

A few respondents express concerns about public transport, saying public transport in the area is inadequate, with some suggesting that the paucity of public transport options forces them to commute by car. One respondent argues that the train system is expensive and does not make adequate provision for disabled travellers. Another suggests it is in need of investment to allow for maintenance and upgrading.

A few respondents mention walking and cycling infrastructure, suggesting that better provisions are needed, with one respondent arguing that numbers of cyclists have risen.

One respondent suggests that the budget for the proposals should be used to carry out repairs to the current M4. Another respondent suggests that more time is needed to judge whether existing measures have been successful in solving problems associated with the M4 around Newport.

Safety and the present transport network

A few respondents think that the current road network is not safe enough and suggest that the proposals would help reduce the prevalence of accidents on the M4. One respondent specifies the stretch between Junctions 26 and 27 of the M4 as a particular concern.

Others argue that improving safety is of less importance, as they believe there is insufficient evidence that the M4 is particularly unsafe.

Pollution and the present transport network

A few respondents discuss air quality in Newport with some emphasising the relation between air quality and public health, occasionally referring to the respondent's own situation. A small number of respondents explicitly link the level of air pollution to the congestion of the M4.

“There are environmental arguments for the new road. Out of Newport's 7 Air Quality Management areas four are associated with the existing M4.”

Other respondents discuss noise pollution associated with the existing M4, with one respondent stating that noise levels exceed 55 decibels in areas adjacent to the M4.

Economic aspects of the present transport network

About 20 respondents comment on economic aspects of the transport network in Newport and the wider region. A few respondents believe that accidents and consequent traffic jams are damaging the Welsh economy, with one of these respondents singling out the existing state of M4 as a factor in this. Some respondents suggest that the existing transport network is detrimental to tourism in the region.

Environmental aspects of the present transport network

A few respondents discuss the impact of the existing transport network on wildlife habitats and woodlands, stressing that these areas are also under threat from various industrial and commercial developments.

Another respondent argues that the visual impact of the current road network is negative and extensive and that vehicles impair the visual quality of historical streets and areas of interest.

5.1.2 Need case for the draft Plan and Reasonable Alternatives

Further information on the need case for the draft Plan can be found in the WelTAG Stage 1 (Strategy Level) Appraisal Report, whilst further information on the Reasonable Alternatives is provided within the Strategic Environmental Assessment and Strategic Appraisal of Alternatives Considered during draft Plan Consultation Report, all available at www.m4newport.com.

Some 150 respondents make comments about the overall need case put forward by the Welsh Government for a new road or motorway around Newport. Approximately 40 of these respondents state that they accept or agree with the need case outlined; about 110 respondents say they disagree.

“Something really does need to be done or the existing M4 route problems will get ever worse. If you're going to do something then do a proper job and create a whole new motorway rather than a dual carriageway as a half-way measure.”

Traffic Growth and Traffic Modelling

In discussing the need case, many respondents challenge the traffic growth projections provided by the Welsh Government stating that they are based on out-of-date information and that they do not factor in improvements and increased capacity of other transport projects, such as the electrification of the South Wales Mainline railway. Respondents suggest that evidence shows a stabilisation of demand in recent years and that there is no basis to predict a significant upwards trend in demand in the near future.

“The traffic modelling which has been carried out in relation to the new road has been based on out of date data and assumptions we believe are incorrect. The Welsh Government’s own traffic figures show that the M4 traffic volume (having fallen after 2007) has now stabilised, and there is no robust evidence to support a significant rise in the future.”

Black Route option

Some 60 comments discuss the need case for the Black Route option. Many of these are critical, challenging the need case and in particular the projections of traffic growth outlined in the consultation documentation.

One respondent questions how the option fits with growing concern about the potential impacts of climate change and the need to reduce car use.

In contrast, some respondents recognise the need for a new section of motorway, often relating this to their support for the Black Route.

Red Route option

Commenting on the need for the Red Route, about 20 respondents challenge the predicted growth of traffic on the M4.

Several respondents state a belief that changing social and political realities mean that car use would decline in the future.

“Your report assumes that traffic volumes will continue to increase whereas in fact [sic] they have reached a plateau.”

Some respondents argue that building a dual carriageway rather than a motorway is a compromise solution that would not have sufficient capacity to achieve the desired outcomes. Conversely, others believe that there is no need for an additional road. Some respondents suggest that the occasions when the M4 is congested are too infrequent to justify the expense and environmental impacts of the Red Route option. Others believe that it would duplicate existing dual carriageway routes.

“If you're going to build a new road, then take the opportunity to build a motorway standard one that will substantially replace the existing M4 rather than just taking a bit of traffic away from it.”

About five respondents state that the option would not benefit Newport, and one respondent states that the negative impacts of the route outweigh the benefits.

Need case for the Purple Route option

About 30 respondents challenge the rationale for the Purple Route. Many respondents challenge both the estimate of the current level of congestion and the projected growth in traffic.

One respondent, while not on balance supportive of the Purple Route, acknowledges the need for additional east-west capacity around Newport. Some respondents state that the potential benefits of the Purple Route do not outweigh the various negative impacts that they believe this route option would cause.

“I think that the purple route is totally unnecessary and will do immense harm to the environment of Newport. The alleged problems on the existing M4 have been exaggerated and, insofar as they exist, can be addressed by other measure[s].”

Do Minimum Scenario

Approximately five respondents discuss how the Do Minimum Scenario addresses the need case. One respondent believes that the Do Minimum Scenario is insufficient and that it would necessitate further investment at a later time. A small number of respondents state that there is no need for a motorway, and that the best solution would be an upgrading of existing roads, including, but not necessarily limited to, the proposals set out in the Do Minimum Scenario.

A small number of respondents challenge the specific programme of committed work included in the Do Minimum Scenario. One believes that the A4810 and A48 have failed to attract traffic from the M4. Another states that they oppose the Newport City Council aspects of the committed schemes (link through Newport Eastern Expansion Areas between Steelworks Access Road and A48 SDR (Cot Hill junction, signalised with full movements).

Several comments state support for the programme of committed work. One respondent states that it is welcome even if they are not sure that it would be particularly effective. Another respondent states that these committed schemes and other recently completed schemes should be given a chance to play a role in

improving the road network before new schemes are considered. Some respondents welcome the proposed redesign of the Junction 28 roundabout (included in the Do Minimum Scenario), believing it would improve safety and reduce delays.

One respondent challenges the Do Minimum Scenario arguing that this proposal ignores other transport strategies under development and is probably in contravention of the Welsh Government's own sustainability policies.

5.1.3 Support and Opposition

As outlined more fully in the methodology (see Section 2.7 of the Full Factual Report, Appendix A1), responses have only been coded with support and opposition codes if their support or opposition is explicitly stated in their response.

When considering this section it is important to remember that reported numbers may have been influenced by responses submitted as a result of interest groups' initiatives. This does not mean that views of people who have been influenced by campaigns are any less important than others, but the reader may wish to consider this when potentially coming to conclusions about what is presented here. Please see section 4.2 for more detail.

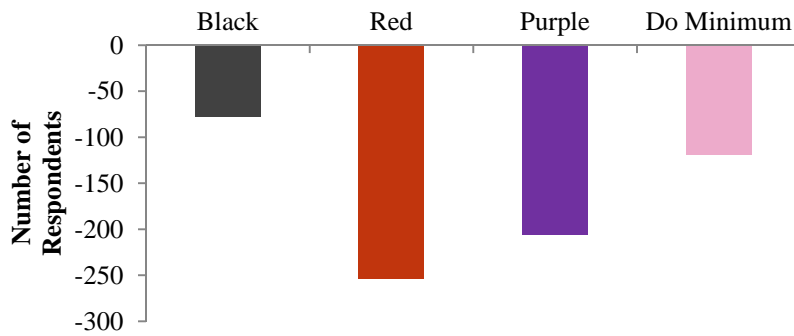
It is difficult to draw accurate comparisons between options in this type of open comment consultation – the consultation was not a vote and did not include questions directly comparing the options. Therefore, comments of support, opposition and preference are provided in many different formats. However, it is possible to draw some inferences of respondents' preferences from the comments which are made.

The following sequence of graphs attempt to make comparisons between particular categories of comments (Figures 5.1 to 5.9). It should be noted that there is no sure way of making numerical comparisons with this type of data and that in order to understand the overall picture, a holistic view should be taken of all of the data presented in this report, rather than just considering each graphic individually.

Net support is a value used to consider the impact of both support and opposition in a single value. It is created by subtracting the number of respondents who object to a proposal from those who express support or support with a caveat. Figure 5.1 provides the comparison of net support for each option.

More respondents express opposition than support for each option, resulting in all options having negative net support values. The Red Route option performs worst with a lower value than the others, whilst the Black Route option performs the best.

Figure 5.1: Net support (Note: a higher value indicates more support/less opposition than a lower value.)



Figures 5.2 and 5.3 illustrate the number of respondents who directly state support or opposition for the four options. It is again clear that more respondents express opposition to each proposal compared to support. However, when options are compared, more respondents state opposition to the Red Route option than the other options. These distinct values also demonstrate that the Black Route option has significantly more comments directly expressing support than the other options, including the Do Minimum Scenario.

Figure 5.2: Support and opposition

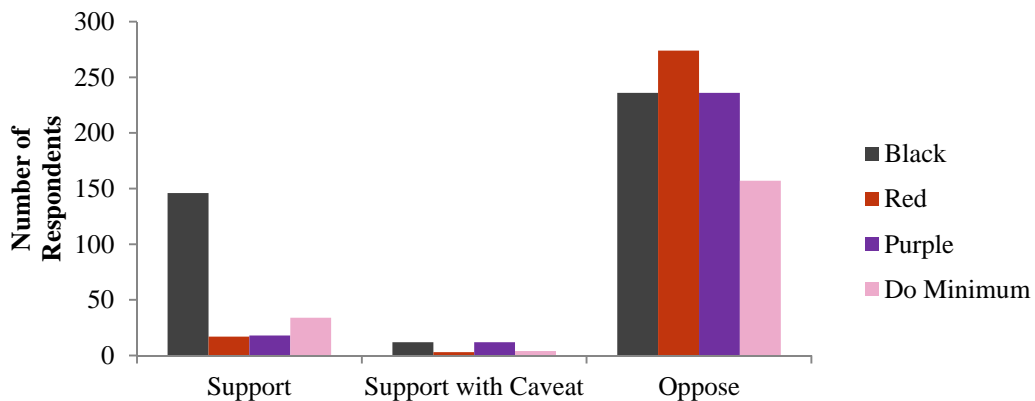
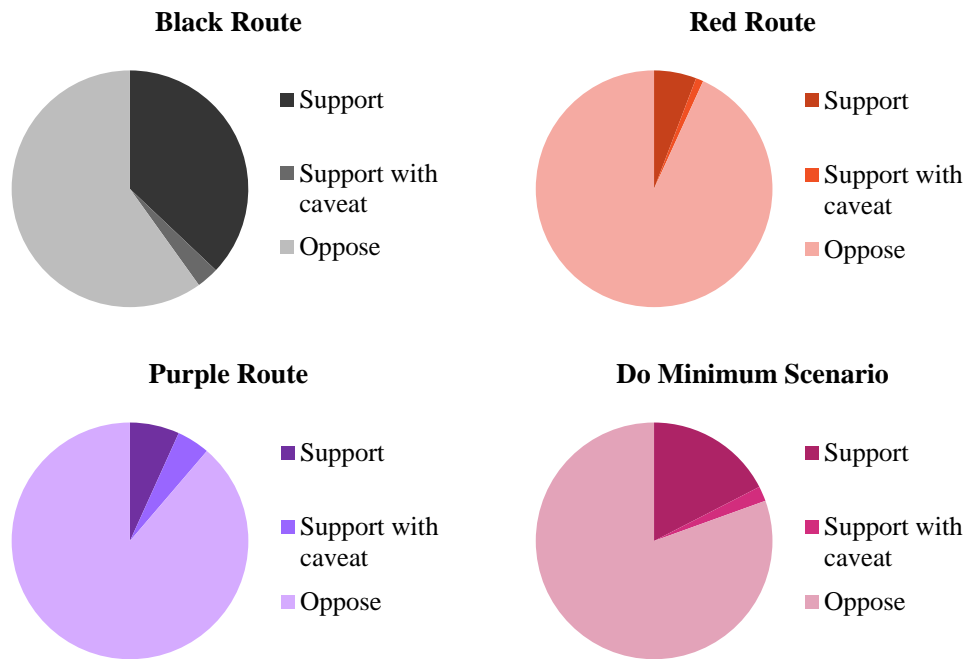


Figure 5.3: Support and opposition by option

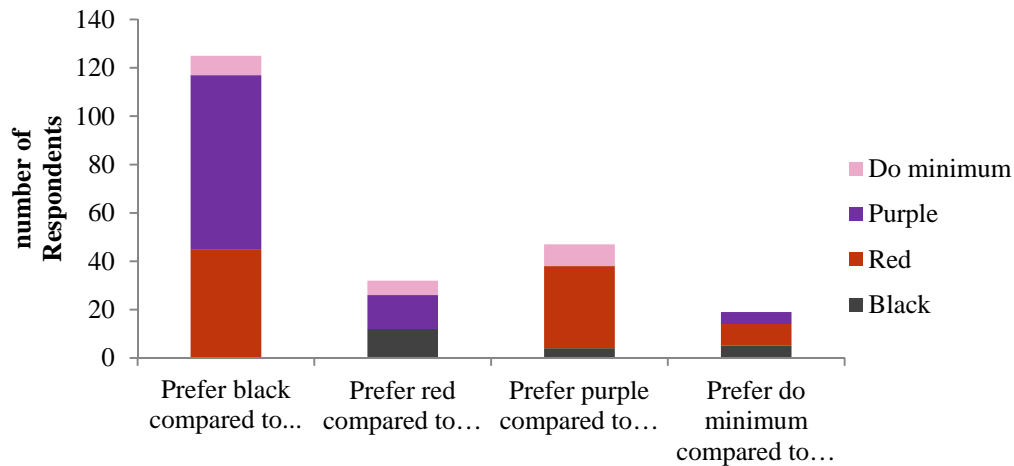


In addition to stated support or opposition to each option, respondents also commonly expressed preferences between options. Figure 5.4 illustrates these comments.

It can be seen from these comparisons that out of the four options, most respondents express a preference for the Black Route option. However, the figures also imply that respondents are not generally comparing these options to the Do Minimum Scenario, or to an alternative which is not covered by this consultation; comparable preferences are largely only indicated between the three routes; Black, Red or Purple.

It can be inferred from Figure 5.4 that respondents who indicated a preference between the options prefer the Black Route option to the Red Route and Purple Route options.

Figure 5.4 Preference between options



Comments provided by respondents were also analysed geographically to look for correlations between opinion and area of residence (where postcodes were provided). Analysis was conducted at both the local project level and over a wider geographical area. This analysis can be found in Appendix A15 and the core project area maps are also provided in Figures 5.5 to 5.9.

One notable finding from geographical analysis is that in most areas the Black Route option is the preferred option when compared to the Reasonable Alternatives and Do Minimum Scenario (Figure 5.5). However, areas where the Black Route option is not preferred are:

- Alway;
- Bettws;
- Ringland;
- Stow Hill;
- Torfaen - Coed Eva; and
- Victoria.

In these areas the Do Minimum Scenario is either as popular, or more popular, than the Black Route option.

Figure 5.5: Preference between options (Core Area)

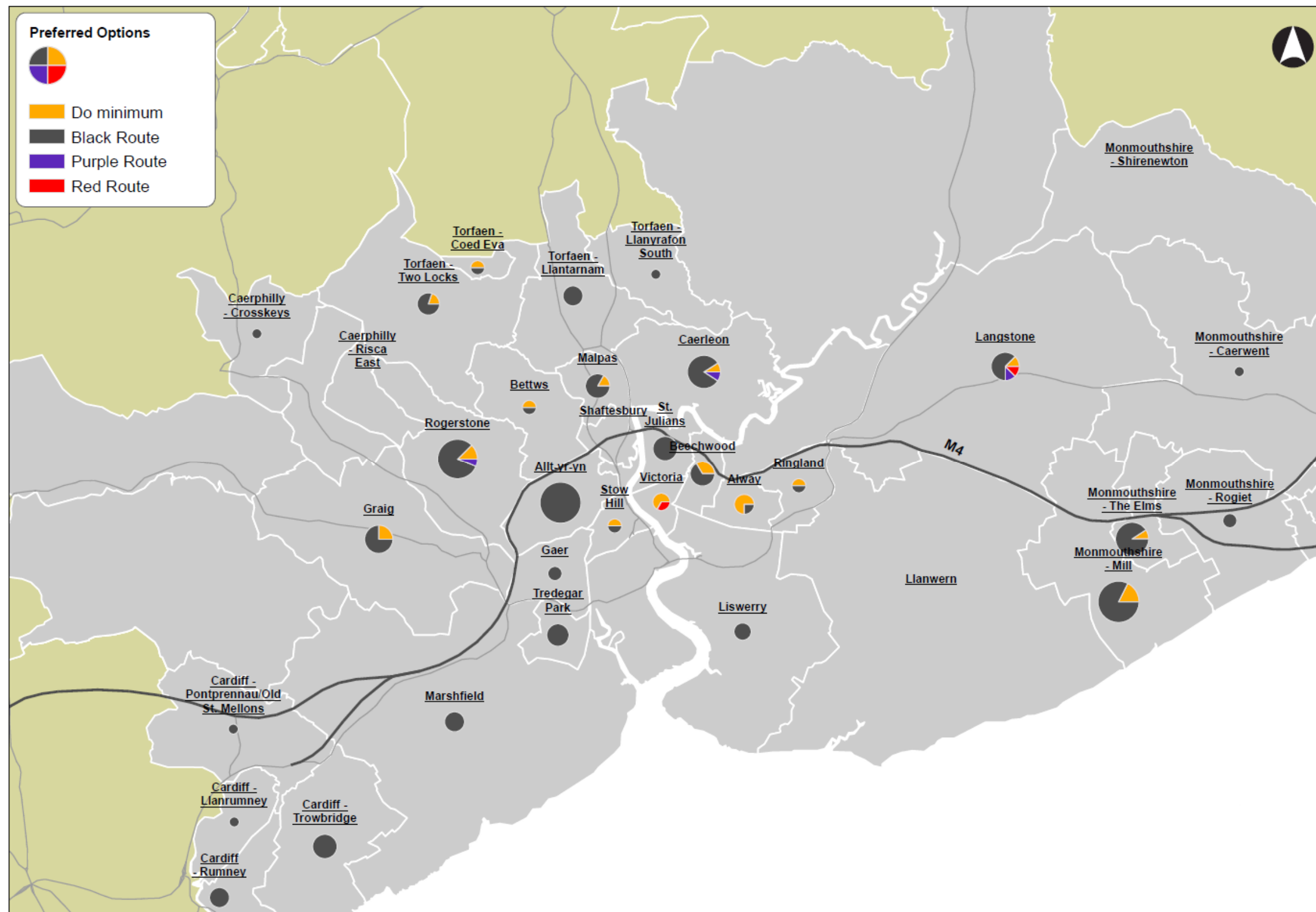


Figure 5.6: Support and opposition for the Black Route option (Core area)

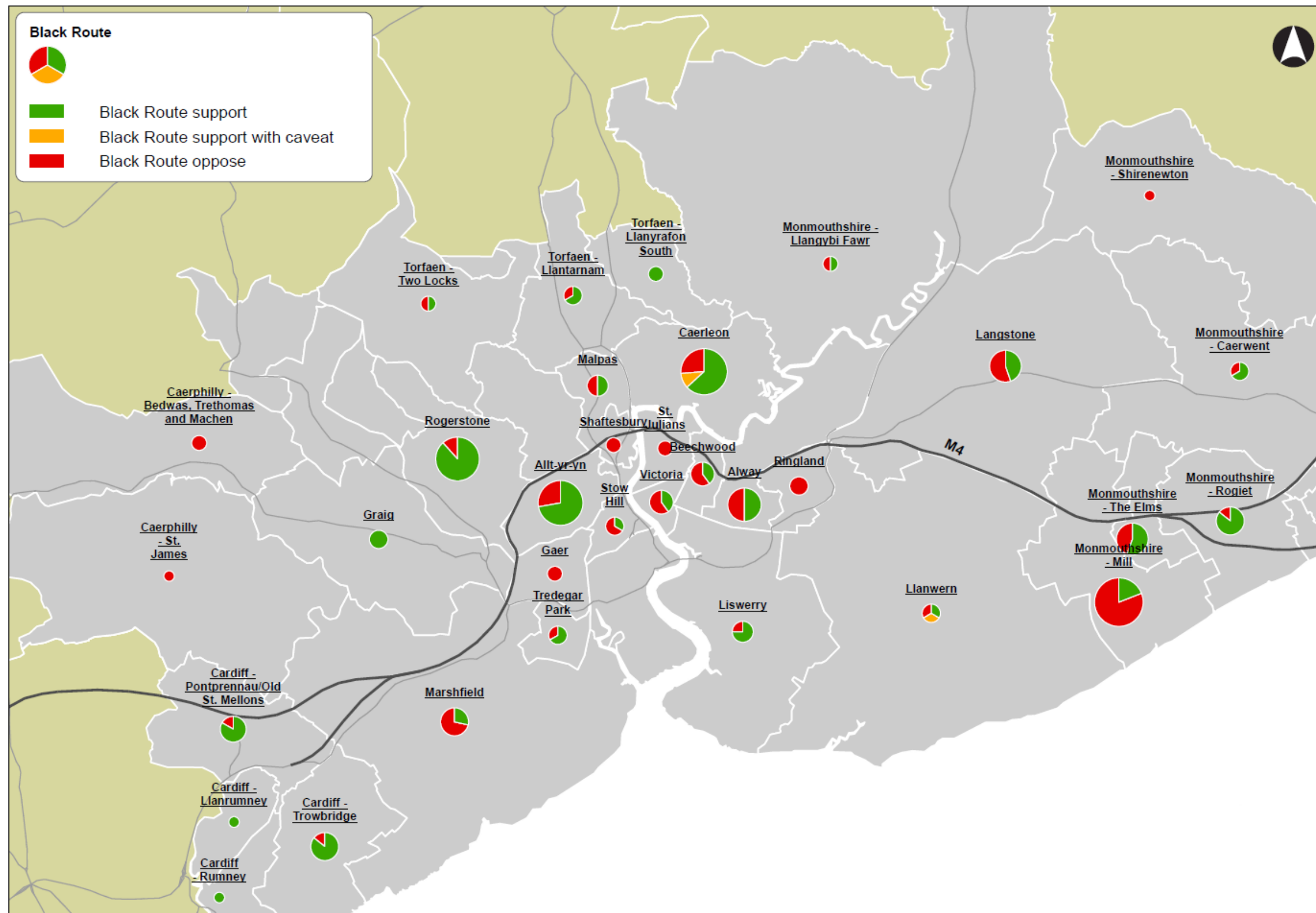


Figure 5.7: Support and opposition for the Red Route option (Core area)

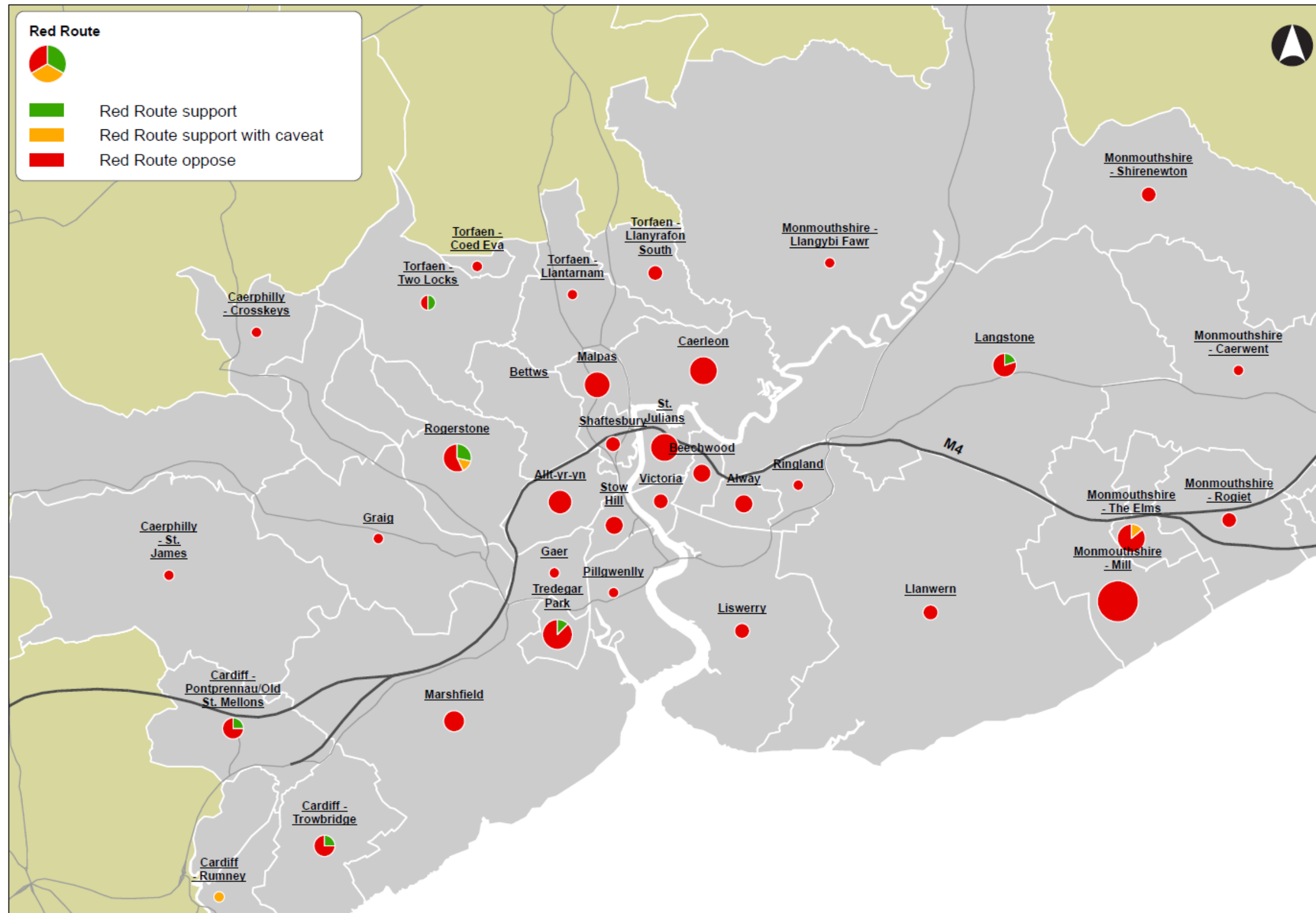


Figure 5.8: Support and opposition for the Purple Route option (Core area)

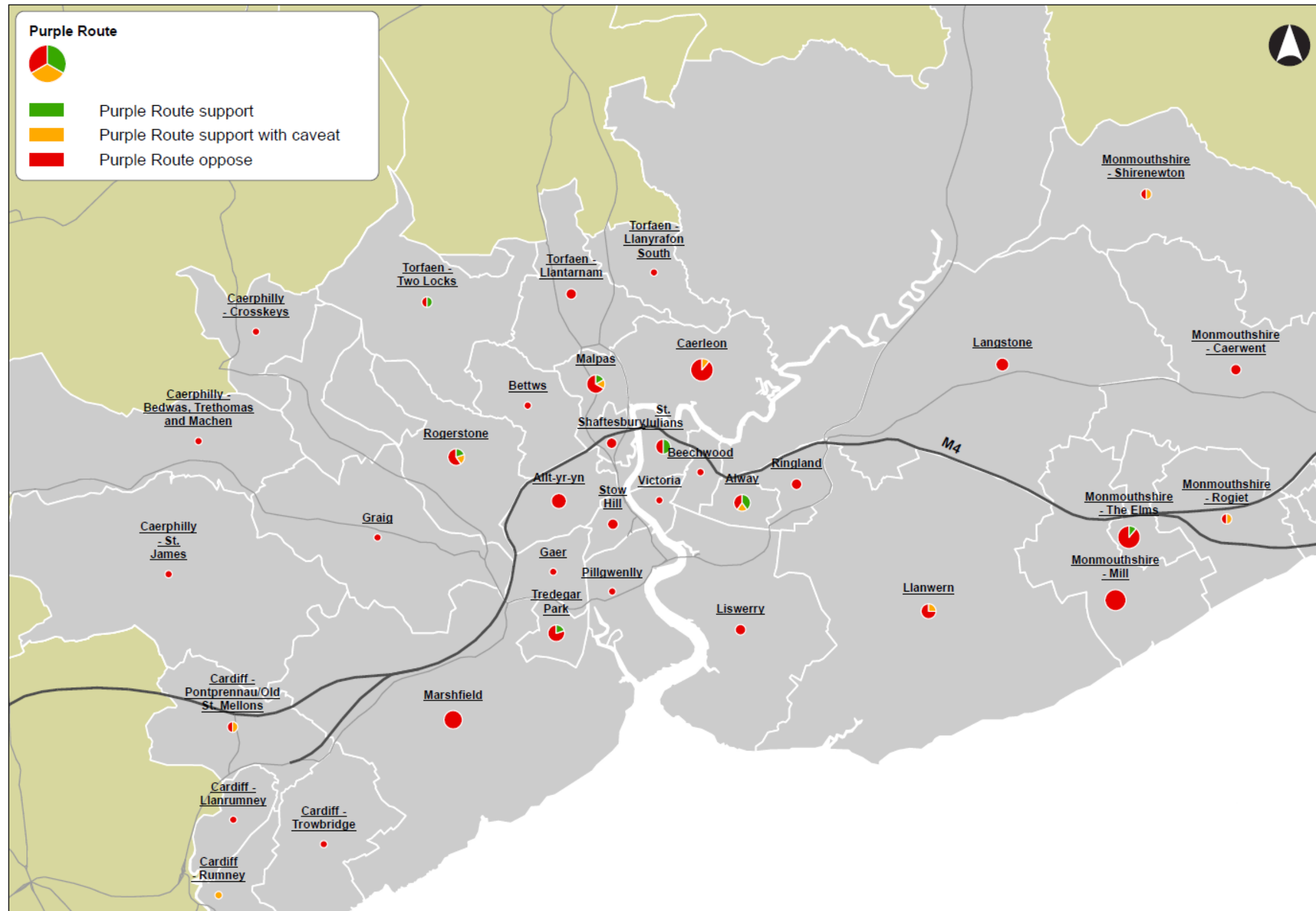
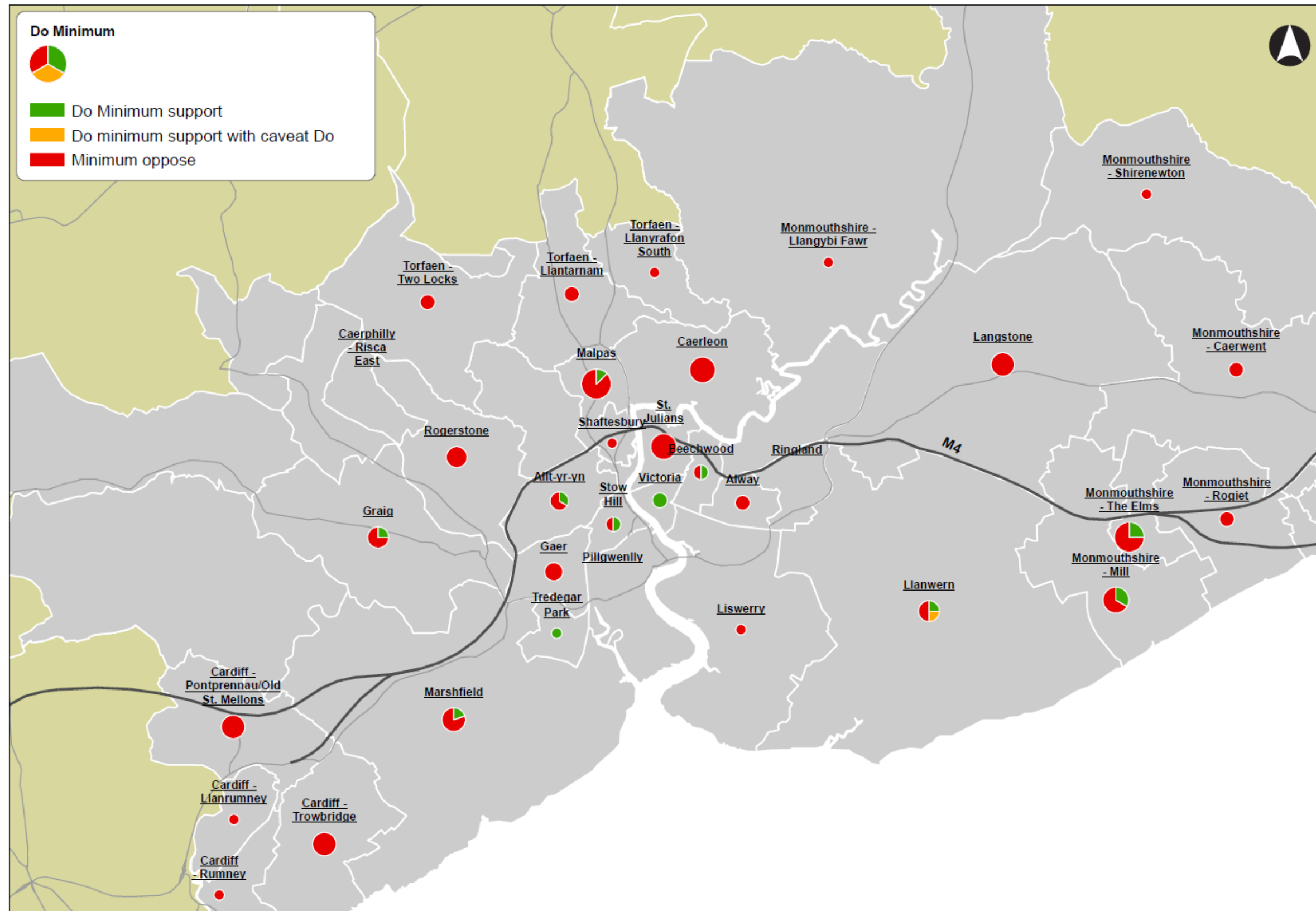


Figure 5.9: Support and opposition for the Do Minimum Scenario (Core area)



5.1.4 Problems and goals

Chapter 3 of the draft Plan Consultation Document sets out the problems and goals for the M4 Corridor around Newport.

Further information on the problems and goals of the M4 Corridor around Newport draft Plan can be found in the WelTAG Stage 1 (Strategy Level) Appraisal Report available at www.m4newport.com.

Black Route option

Approximately 50 respondents discuss the goals generally, with about 40 suggesting that the Black Route option would achieve, or largely achieve the goals. About 15 respondents state that it would not achieve the goals, or would not be a long-term solution.

Some respondents discuss specific goals. Some 40 respondents mention goals associated with improved journey times, or an improved travel experience and most of these respondents believe the Black Route option would achieve these goals.

“My opinion is that a 3 lane motorway, as straight as possible is required to decrease journey times, ease the current congestion problems and support the economic growth of Wales into the future.”

A small number of respondents take the opposite view and say that the Black Route option would not or insufficiently achieve goals associated with improved journey times.

Most respondents commenting on the goals associated with regional transport connections, particularly access to and connections across South Wales, are optimistic about the Black Route option’s potential to achieve these.

A few respondents think that the Black Route option would achieve goals associated with sustainable choices and/or emissions. Approximately 25 respondents argue that the Black Route option would not achieve these goals, with some suggesting that it would do the opposite of what the goals imply.

About 80 respondents who comment on the problems refer to them collectively. About 45 of these respondents believe that the Black Route option would address the problems as a whole. About ten respondents argue that the problems would be partially addressed. Approximately 25 respondents do not think the problems would be resolved.

A few respondents express doubt that the proposed route options are long-term or sustainable solutions to the problems. Respondents question how these proposals fit with the Welsh Government’s positions on sustainable development and the environment.

About 290 respondents discuss specific problems. Problems associated with capacity and congestion are mentioned most frequently, with many respondents arguing that the Black Route option would be successful in addressing problems associated with congestion.

“By building another motorway around Newport this would ease congestion and take the pressure off this stretch [sic] of motorway leading to fewer incidents and accidents”

In contrast, several respondents think that problems associated with congestion would persist if the Black Route option is adopted. Similarly, respondents argue that a new road attracts additional traffic which would undermine a resolution to problems associated with capacity.

“I also believe that more road space will not reduce congestion but encourage more road use at a time when investment should be focused on developing more sustainable forms of transport and infrastructure.”

Most respondents believe that the Black Route option would be successful in addressing problems associated with safety and resilience. Respondents are sceptical about the Black Route option’s potential to solve problems associated with noise pollution. Some respondents think problems associated with air quality would be addressed by the Black Route option, either for particular locations or as a result of reduced congestion. Others are sceptical about this and say the Black Route option would aggravate problems associated with air pollution, either locally or in relation to overall emissions.

Red Route option: problems and goals

Discussing the Red Route, approximately 35 respondents comment on the goals generally, and many say the route would not help meet these. One respondent believes that the option would achieve the goals in general. About five respondents think that the Red Route option would partially achieve the goals, or provide only a short-term benefit.

Approximately 55 comments discuss specific goals. One respondent believes goals associated with reduced journey times would be met by the Red Route option but several are not confident that this would be the case.

Similarly, a small number of respondents think that goals associated with a modal shift to sustainable choices would be achieved, while most respondents commenting on these goals think the Red Route option would not be successful in achieving them.

Discussing goals associated with regional transport connections, one respondent thinks that the Red Route option would enable their realisation, while many others believe it would not.

Several respondents think that the Red Route option would meet the goals associated with reducing emissions.

As with the goals, many of the respondents who comment on the problems refer to them collectively, with about five respondents stating that the Red Route option would resolve the problems and about 45 respondents asserting that the Red Route option would not resolve the problems. Of those who say the problems would be resolved, many state that the Red Route option would only be a short-term solution.

A small number of comments state that the Red Route option would solve problems associated with air quality and pollution; most respondents who discuss

problems associated with air quality and pollution believe that the Red Route option would not resolve them.

Many comments relating to the problems associated with capacity and congestion state that the Red Route would not resolve these or would undermine capacity gains by encouraging additional traffic onto roads. A small number of respondents suggest that the Red Route option would help resolve problems associated with capacity and congestion, however, some argue that not all traffic would benefit or that benefits would be limited to the short-term.

There are small numbers of respondents both agreeing and contesting that the Red Route option would resolve problems associated with resilience and safety. One respondent describes the Red Route option as the least resilient of the proposed options.

There are some 20 comments regarding problems associated with noise pollution; all of which suggest that the Red Route option would not solve these.

Problems and goals relating to the Purple Route option

Relatively few respondents explicitly relate their comments to how the Purple Route would address these problems and achieve these goals. In relation to the goals, most of these respondents refer to them generally, with similar numbers of comments stating that they would (or would largely) be met by the Purple Route option, and that they would not be met by the Purple Route option. Several respondents suggest that the Purple Route would have a short-term benefit, but not provide a long-term solution.

“Good, will make commuting easier.”

Approximately 35 respondents discuss specific goals.

Several respondents believe that the Purple Route option would not achieve goals associated with improved transport connections.

One respondent suggests that the Purple Route option would achieve goals associated with a modal shift to more sustainable transport options, while other respondents who refer to goals associated with sustainability in general or specifically a modal shift state that they would not be achieved.

Only a small number of respondents comment on goals associated with improved journey times, with a few believing that the Purple route would achieve these goals and a few believing it would not.

Those respondents who discuss goals associated with reducing emissions state that they do not think that these would be achieved by the Purple Route option.

One respondent says that the Purple Route option would not achieve goals associated with an improved travel experience.

Similar to comments on the goals, about 45 respondents who comment on the problems discuss them collectively. Most of these respondents express the belief that the Purple Route option would not address the problems as a whole.

Respondents are generally sceptical that the Purple Route option would solve problems associated with air quality, noise pollution and safety.

Most respondents who discuss the Purple Route option's potential to solve problems associated with capacity and congestion think that it would not. A few respondents do believe that it would solve such problems. Among the respondents who are sceptical, several emphasise that the Purple Route option would not suffice in the long term, and some argue that the additional capacity would encourage an increase in car use.

"A complete new motorway is not required – it will create extra capacity that will just be filled by more people travelling on the network."

Problems and goals relating to the Do Minimum Scenario

About 30 respondents discuss the goals generally, with about 25 respondents stating that they would not be achieved by the Do Minimum Scenario. About five respondents believe that the Do Minimum Scenario would achieve the goals. A couple of respondents suggest that the Do Minimum Scenario would have a short-term benefit, but not provide a long-term solution.

"This will not provide an acceptable solution and is therefore not a realistic alternative."

About five respondents discuss specific goals. These respondents suggest variously that the Do Minimum Scenario would not meet the goals associated with improved travel experience, journey times or transport connections. One respondent suggests that the goals associated with a shift to sustainable choices would be achieved by the Do Minimum Scenario.

Similarly to the goals, about 65 respondents discuss the problems collectively, and about 60 believe that they would not be resolved by the Do Minimum Scenario. About five respondents suggest that the scenario might worsen the problems. A similar number of respondents believe that the Do Minimum Scenario would solve the problems, or partially solve them. About 15 comments state that any benefit would only be short-term.

Respondents generally do not think the Do Minimum Scenario would achieve goals associated with improving air quality and pollution, capacity, resilience or safety.

Respondents' views are split on whether the Do Minimum Scenario would address problems associated with congestion. Many believe that the Do Minimum Scenario would either worsen or not improve congestion. In contrast, some respondents argue that problems associated with congestion would be addressed.

5.1.5 Cost of the draft Plan, Reasonable Alternatives and Do Minimum Scenario

Further information on costs for the Black Route will be provided within a Business Case, should the Welsh Government decide to adopt the draft Plan, with or without amendment.

Where respondents comment on the cost of the proposals and the funding arrangements in place to finance any scheme, they commonly express concern, saying the cost is too high, with reference to the global recession and government budget cuts. Approximately 60 respondents expressly state that they would prefer

the capital investment to be allocated to other areas such as education, healthcare, community and social resources, jobs and economic regeneration.

“There are thousands of better ways to spend this money in Wales – jobs elderly disadvantaged [sic].”

These comments reflect issues raised for each of the proposed options individually which are detailed as follows.

Black Route option

About 120 comments are made regarding the cost associated with this option, with some 110 stating concern. Specific concerns include the belief that the cost is disproportionate to the severity of the problems it is aimed at tackling, that the cost is simply too high or that the cost is unjustified during a period of recession and public sector funding cuts.

“The cost is prohibitive, WG will have to borrow billions which the Welsh people cannot afford.”

Others suggest that the Black route would be the cheapest of the options proposed, or that the cost is justified by the reduction of congestion and the saving of lives.

“The draft plan (Black Route and its complementary measures) would be the most preferred route and the cheapest option.”

One comment refers to recent legal rulings on compensation procedures for other transport infrastructure projects and questions whether the potential cost of property compensation has been adequately factored into the estimates.

Red Route option

About 70 respondents make comments concerning the cost of the Red Route option. Many are concerned that this option would prove less effective than the Black Route or Purple Route options but still be at a comparable cost.

Purple Route option

About 50 comments express concern at the cost of the Purple Route. Some respondents suggest that the Purple Route would be more expensive to build than the Black Route yet would deliver similar benefits. Other respondents argue that the hoped for benefits could be achieved by other means for significantly lower cost and that it would not be cost-effective. Some state that the significant cost of the option would affect funding for other areas of government spending, particularly public services, which they regard as more important. Several respondents suggest that the route might be cheaper to build than the Black Route due to its alignment avoiding the docks.

Do Minimum Scenario

Approximately 30 comments discuss the cost of the Do Minimum Scenario. The vast majority regard the schemes lower comparative cost as a positive, particularly in light of the current economic climate.

Several respondents doubt the value for money of the Do Minimum Scenario. Some respondents suggest that the improvements would not sufficiently tackle the

problems on the M4 and potentially require further improvement works at a later date at an overall greater combined cost.

5.1.6 Design and construction of the draft Plan and Reasonable Alternatives

Further information on the design and construction of the measures set out in the draft Plan will be provided as part of scheme level appraisal, should the draft Plan be adopted, with or without amendment.

About 20 respondents discuss the positive and negative impacts of the construction of a new road. Respondents also provide comments and suggestions on the design of various aspects of the proposals, most notably the number and placement of junctions. Approximately 50 respondents emphasise that the project should be completed as soon as possible.

“Eastern end of proposed scheme makes no sense at all. There is little or nothing to be gained by the people of Magor and Undy from this scheme but it will impact them hardest.”

Black Route option

About 250 respondents comment on the construction and design of the Black Route option. Of these, about 85 think that it should be completed as soon as possible, that the scheduled date for delivery is too distant, or that a new section of motorway around Newport is long overdue.

Approximately 30 respondents mention junctions, with comments addressing the location, design and number of junctions between the Black Route and existing local roads and motorways. Some respondents stress that junctions would help Newport to share in the economic benefits of the scheme, while others think there should be no, or a limited number of, junctions to prevent heavy use of the road by local traffic.

“The Black [R]oute should have possibly have [sic] no access to Newport, just make it a complete bypass. Anyone who wants to go into Newport can use the existing M4.”

About 15 respondents think it is important a new road would be a three-lane motorway and state their satisfaction that the Black Route meets this specification. Some 25 respondents believe that the Black Route would be the shortest, quickest or most direct route around Newport.

Some respondents suggest modifications to the Black Route option, stating that they would like the Black Route to be sited further away from Magor or suggesting that the route be elevated where it crosses the Gwent Levels.

A small number of respondents suggest that tolls should be raised from users of the Black Route in order to reclaim the costs of construction. A few others suggest this would discourage drivers from using it.

Some 15 respondents raise concerns about the potential disruption to residents, businesses, the existing road network and the environment from the construction of the Black Route. Some respondents indicate that while they acknowledge the benefits of the Black Route, the disrupting impacts of construction bring them to

oppose the route. Several respondents think that construction of the Black Route would be less disruptive than the construction of other options.

Red Route option

Some 130 comments are made about the construction and design of the Red Route option. Many respondents state that a new road needs to be three lanes each way and of motorway grade.

A few respondents think that there should be no traffic lights or roundabouts incorporated into the design. Similarly, several respondents advocate excluding junctions from the entire route. Other respondents comment on the design or location of junctions to and from the existing motorway. A few state their opposition to raising tolls.

“Any proposed scheme must move long distance (travel of 20 miles and above) commuter or freight [traffic] through the area without traffic lights or roundabouts interfering.”

Some ten respondents comment on the route’s alignment. Specific concerns include bends that respondents perceive as unnecessary; whether the road needs to be raised where it crosses flood plains; and impact on existing buildings and infrastructure. Some respondents express concerns about the engineering challenges of building over a landfill site, or that the Red Route would be longer and less direct than other proposed options.

Some respondents express concern about the Red Route’s timescale for delivery and the proposal to complete the project in phases.

Purple Route option

Approximately 40 respondents discuss the design and construction of the Purple Route. Some respondents suggest a number of requirements they believe need to be included in the design of the Purple Route. A significant number of these comments express the view that the Purple Route is satisfactory due to its inclusion of a three lane motorway.

“The [P]urple [R]oute is acceptable as it provides a 3 lane motorway around the south of [N]ewport helping to relief pressures”

Several respondents explore the design and location of junctions on the proposed route with disagreement over whether junctions should be included or not. Also, some believe that the Purple Route’s alignment would make junctions cheaper to build and would improve traffic flow.

Some respondents highlight the greater number and tightness of curves in the Purple Route, in comparison to the Black Route and some suggest that this could slow down traffic and increase the risk of accidents. A number of respondents compare it unfavourably to the Black Route, suggesting that it would be longer, slower and less direct.

Many respondents also express concern about the potential disruption during construction of the Purple Route, particularly where the Purple Route is situated close to communities such as Duffryn.

As with the Black Route option, some respondents state that a new section of motorway is long overdue and press for construction of the route to begin as soon as possible.

Do Minimum Scenario

Approximately five respondents discuss the construction and design of the Do Minimum Scenario. Some respondents comment that using the existing network rather than building a new three-lane motorway would be insufficient to meet demand. In relation to the Do Minimum Scenario's proposals for junctions, some respondents express support for the upgrade of Junction 28 roundabout and a suggestion to add the M48 – B4245 link to the proposed list of measures. Some respondents support improving signage on the M4 to encourage use of the A48.

5.1.7 Economic impacts of the draft Plan, Reasonable Alternatives and Do Minimum Scenario

Further information on the economic impacts of the draft Plan and Reasonable Alternatives can be found in the WelTAG Stage 1 (Strategy Level) Appraisal Report available at www.m4newport.com.

Black Route option

About 155 respondents make comments about the impact of the Black Route option on the economies of the Newport area and Wales. About 70 respondents believe there would be beneficial economic impacts, while about 50 think the impacts would be negative. Those who believe the option would provide economic benefits refer to the need for successful economies to have a high quality, reliable transport network and suggest that the existing M4 acts as a constraint on economic growth and job creation in Wales. Other respondents remark that the option would encourage inward investment and regeneration of Newport and enable better movement of goods.

“[I]t will address the immediate problem as well as providing a long term strategic solution not only for the development of Newport but also for the other local authorities along the M4 corridor.”

Those who dispute the economic benefits tend to focus on the Newport economy, suggesting that the Black Route would simply act as a bypass to Newport making it easier for businesses and potential customers to travel to and from Cardiff rather than invest in or visit Newport.

Some respondents discuss tourism, with several believing that this industry would benefit from the Black Route option as it would improve access to Wales for visitors. Others do not believe that the Black Route would support tourism, saying it would affect the Gwent Levels, hampering the area's attractiveness to tourists.

Some respondents express concern about the economic impacts on the Port of Newport and its docks. Respondents think the Black Route's river crossing would limit or prevent shipping activities in the port, which some say would have a knock-on effect on other businesses in the docks area.

“The Black [R]oute would cause particular severance problems with Newport Docks. The ability of boats to come into the port would be seriously affected, and business would be lost.”

A couple of respondents suggest that because of its alignment, further to the south than other route options, the Black Route option would have the least impact on the landfill site and on potential future developments around Newport.

Several respondents are concerned about potential devaluation of properties along the Black Route, in locations such as Castleton, Magor and Undy.

Red Route option

About 60 respondents comment on the economic impacts of the Red Route option. While a few state that the option would benefit the local economy, most believe that the local and/or Welsh economies would be negatively impacted.

“The Red route involves too much disruption to the central areas of Newport, and as the current council are trying to revitalise the town, its town centre, and it’s [sic] general image across the country, further major road works would severely disrupt those plans. Newport traders have endured enough turmoil.”

Some respondents express concern that the option could result in a loss of value to properties close to the outlined route in communities such as Duffryn and at proposed new developments such as at Glan Llyn. Some respondents are concerned that the business usage of particular parts of the city, including the Dock’s Way Landfill site and the Newport docks area could be affected.

Several respondents think the Red Route would have an impact on tourism. Some respondents express concern that it would deter visitors, and damage tourist assets including Usk and the Gwent Levels, both during construction and after. Respondents also express concern about the Red Route’s impact on farming.

Purple Route option

Approximately 25 comments refer to the potential economic impacts that they believe could result from the Purple Route option.

While some respondents argue that the wider Welsh economy would benefit from the Purple Route, some suggest that Newport and its economy would either see no benefit, or would be negatively impacted. A few respondents suggest that the option would provide easier and quicker travel past Newport, therefore making it more viable for businesses to locate elsewhere in Wales or improve efficiency for those already in operation. Some respondents believe that the benefits of passing trade would be reduced if the proposals do not include junctions into the city from the proposed new M4.

“With no additional junctions for Newport local access [sic] for business investment does not exist but instead is pushed further [w]est; this is not good for the local economy.”

Respondents often express concerns about the potential curtailment of land use around the docks area of Newport if the Purple Route is implemented, and some are concerned that it would negatively affect the operational capacity of the docks themselves. Some respondents refer more broadly to the area around Newport’s docks, including the potential impact on redevelopment of the dock areas for commercial or residential purposes. Similarly, a few respondents raise concerns about the potential impact on the landfill site.

A few respondents suggest that the encroachment of the route on the Gwent Levels would result in a knock-on negative impact on the tourist industry of the area.

A small number of respondents are concerned that the route's proximity to housing means that there would be a negative impact on residents' property values in these areas.

A number of responses are concerned that the route could have an impact on proposed and potential future employment, housing and transport developments in the Newport area.

"It offers reduced benefits (when compared with the Black Route) and would interfere with existing and proposed developments."

Do Minimum Scenario

About 50 respondents discuss the economic impacts of the Do Minimum Scenario. A couple of respondents state that the Do Minimum Scenario would improve both the local and wider economy, primarily because it could have the highest improvement to cost ratio. In contrast, many respondents comment critically on the economic impacts of the Do Minimum Scenario. Some respondents suggest that the Do Minimum Scenario would not deliver any benefits for either the local or the wider Welsh economies. Some argue that the Do Minimum Scenario would actually worsen the economic situation. This is often due to the belief that the scenario would not tackle issues such as congestion and would therefore discourage future investment in the area and lead to the loss of existing business.

"The impact on the Welsh economy as well as business, commuters and local people will be catastrophic [sic], this project MUST go ahead."

Similarly, a few respondents state that the Do Minimum Scenario would adversely affect the development of the tourism industry.

5.1.8 Environmental impacts of the draft Plan, Reasonable Alternatives and Do Minimum Scenario

Further information on the environmental impacts of the draft Plan and Reasonable Alternatives can be found in the WelTAG Stage 1 (Strategy Level) Appraisal Report, Strategic Environmental Assessment and strategic Habitats Regulations reports, available at www.m4newport.com.

Whilst some respondents believe there would be environmental benefits associated with the three route options, all three routes have a significant number of comments expressing concern. It should be noted that organised or campaign responses were generally in relation to concerns about environmental impacts.

Concerns that are common across the three route options include:

- Impact on the Gwent Levels and associated SSSIs in relation to:
 - habitat fragmentation;
 - biodiversity;
 - waterways and reens;
- Impact on ancient woodlands;
- Impact on the River Usk SAC;
- Pollution, including run-off and light;
- Ancillary development;
- Impact on cultural heritage; and
- Impact on agriculture.

Black Route option

Some 850 comments are made regarding the potential environmental impacts of the Black Route option.

About 150 of these comments refer to the environment in general terms, mostly expressing concern about environmental damage associated with the Black Route. Comments also include suggestions that the route could have environmental benefits, that it would have a lesser impact than other options and that the environmental impacts would not be significant.

Many respondents express specific environmental concerns and highlight the possible negative impact on the Black Route option on the Gwent Levels, its protected or designated areas and their biodiversity, wildlife and habitat. Respondents emphasise the Gwent Levels' historic, international and ecological importance. Many respondents are concerned about the potential destruction of two areas of ancient woodland.

“The Black Route would destroy irreplaceable ancient woodland about a mile north east of Marshfield at grid reference ST 272 840. We cannot afford to keep destroying irreplaceable ancient woodland. Moreover, the destruction of ancient woodland is clearly against section [sic] (paragraph 5.2.9) of the Welsh Government's own Planning Policy which states clearly that: ‘Ancient and semi-natural woodlands are irreplaceable habitats of high biodiversity value which should be protected from development that would result in significant damage.’”

A small number of respondents downplay the impacts on the Gwent Levels and their protected or designated areas and wildlife, biodiversity and habitat. While acknowledging that the Black Route option would impinge on the Gwent Levels, some respondents argue that the route would mostly affect its periphery, which they say is adjacent to existing brownfield land.

Some of these respondents are confident that wildlife could adapt to the presence of a motorway. Others suggest the impacts on wildlife are outweighed by the benefits of the Black Route option.

“I am a member of both the RSPB and WWT so I am aware of the SSI [sic] and impact on wildlife and water fowl. However I think the benefits of the Black Route far outweigh the negative impact on biodiversity.”

Some respondents are concerned about the impact of the Black Route on the landscape around Newport, particularly on the Gwent Levels. Respondents also raise concerns about the visual impact on locations such as Castleton and Magor and the impact of elevated sections of the route on the landscape.

“My concerns are that in order to climb the incline the motorway would have a significant impact on the landscape at Castleton, and be clearly visible and heard for many miles.”

A number of respondents express concern about the impact on the Level's reens and waterways, arguing that they might be polluted by run-off from the Black Route, or by the fall-out of an accident. One respondent suggests that negative impacts on reens and waterways could be prevented by building a raised motorway. Several respondents worry that the Black Route would run through an area liable to flooding.

Both the reens and the wider Gwent Levels area are described by some respondents as important heritage assets that the Black Route would affect. Respondents also express concern about other aspects of cultural heritage they believe could be affected by the Black Route option including a vicarage at Magor, and the docks.

Several respondents raise concerns about the Black Route's impact on farming. Their concerns include the loss of farm land, run-off from the road potentially contaminating land, and the proposed motorway severing farmers' land, resulting in access issues.

Mitigation of environmental impacts is discussed by about 20 respondents. Of these, ten believe that the negative impacts can be mitigated, or that proposed mitigation is sufficient, while about five respondents claim mitigation measures would be insufficient. Some suggest specific mitigation measures, including noise barriers and screening.

Approximately 15 respondents address ancillary development – ribbon development alongside the route – which they think could be encouraged alongside the new road, resulting in additional pressure on the Gwent Levels. Some respondents comment that a covenant should be created to prevent this. Other respondents suggest that the Black Route may help curb the potential future spread of the city outwards towards the Gwent Levels by creating a clear southern boundary to the city.

“In addition it will lead to unnecessary and unwarranted development along the corridor of the route, as has occurred at many points along the existing M4.”

Red Route option

Some 450 respondents comment on the Red Route's impacts on the environment. Of these, approximately 80 respondents refer only to general environmental impacts. About 70 of these respondents say they are concerned about the potential impact, while about five state that the impact would be less significant compared to other options.

“If there was to be a new road in place, I think this would be a better option, as this wouldn't have such a hard impact on the environment and communities!”

The most prevalent specific environmental concern of respondents is the potential impact of the Red Route on the Gwent Levels and its designated status, with some responses highlighting its wildlife habitats, reens and waterways and/or its beautiful historic landscape. Several respondents express concern that if this road is built, adjacent areas of the Gwent Levels would come under pressure from proposals for additional development alongside the road.

“As with the Black [R]oute, allowing this to happen has the potential to devalue the designation, and opens the gates for other "small losses" in the future. If a site has been designated then the value of this designation needs to be upheld.”

A few respondents express concern that the Red Route might result in the loss of two areas of ancient woodland near Marshfield and near Duffryn. A small number of respondents think the Red Route would negatively affect the River Usk, which is noted to have an SAC and SSSI designation. One respondent is concerned that the Red Route runs through a flood plain.

Some ten respondents make comments regarding the potential impact on cultural heritage, including the historic cityscape about the docks area, the setting of the transporter bridge and listed buildings.

A small number of respondents raise issues of visual, air and noise impacts on the community of Duffryn, and noise and light pollution on residential properties more generally.

Several respondents question whether due consideration has been given to contemporary environmental concerns, most notably global warming.

A small number of respondents do not think that the environmental impacts of the Red Route are of significant concern. These respondents suggest that the impact on biodiversity and wildlife would be minimal as only a small proportion of the Gwent Levels would be used, and because they believe that wildlife would successfully adapt to changes in their environment.

One respondent states support for environmental mitigation, while another expresses doubt that mitigation would be possible.

Purple Route option

Approximately 245 respondents discuss the environment impacts of the Purple Route option. Most of these are concerned about the potential negative impacts of the route. In contrast, a few suggest that the Purple Route would minimise environmental impacts in comparison with the other proposed options.

Of particular concern to some respondents is the potential impact of the route on the Gwent Levels, with respondents often specifying the multiple Sites of Special Scientific Interest (SSSIs) situated within the area.

“There are [f]ive Sites of Special Scientific Interest across the Gwent Levels because of the globally important invertebrates, plant species, otters, water voles and breeding birds that can be found there.”

Respondents specific concerns about the impacts on the Gwent Levels include potential damage to biodiversity, wildlife and habitat, ancient woodland, and wetlands and reens. Some respondents describe the damage the route would cause to the Gwent Levels as irreparable. A few respondents suggest that the impact on the Gwent Levels would be less with the Purple Route rather than the Black Route due to, for example, the more northerly routing around Duffryn and through the Dock’s Way Landfill Site. Another respondent is confident that wildlife would adapt.

“[E]ncroachment onto the SSSI’s is minimal and the wildlife will adapt as they [sic] have in the past.”

Several respondents note that the Gwent Levels are a floodplain and suggest that the Purple Route could exacerbate the problem of flooding. Several raise concerns about the need to cross the River Usk, parts of which are designated as Special Areas of Conservation (SACs). Conversely, one respondent suggests flooding would not be exacerbated as the route would go over the river. Similarly, one respondent suggests that the Purple Route would avoid the wetlands.

Some respondents express concerns about the impact of the Purple Route on the countryside and landscape, including the visual impact. Specific locations mentioned include the Gwent Levels and Duffryn.

A number of respondents raise concerns about pollution. Some respondents discuss emissions levels and air pollution, with some suggesting that a new road would increase overall pollution levels. A few respondents suggest that the Purple Route would introduce or significantly increase pollution in areas previously less affected. However, another respondent suggests that pollution in areas around the existing M4 would be reduced by the Purple Route.

Some respondents also frequently express concern regarding the impact of run-off from the motorway seeping into the Gwent Levels’ water systems. A number of respondents raise other concerns, such as noise pollution, particularly referencing the effect on residents in areas such as Duffryn, and the effect on the Gwent Levels. Some respondents also mention light pollution as a potential negative impact that could be caused by the Purple Route.

Several respondents are concerned that, by building the Purple Route, the area of the Gwent Levels situated alongside the route would become devalued and vulnerable to future infrastructural and commercial development.

Others also suggest that building the Purple Route would be at odds with growing concern about environmental issues such as global warming.

Do Minimum Scenario

About 40 respondents discuss the environmental impacts and benefits of the Do Minimum Scenario. Many respondents believe that this scenario would have the

least impact on the environment, and in particular, on biodiversity, wildlife and habitat and the landscape of the Gwent Levels and its associated SSSIs. One respondent highlights that avoiding construction on the Gwent Levels would enable work to improve the environmental quality and biodiversity of the area to continue.

“Enhancement of the existing highway is the obvious, standard, reasonable and effective way forward... the best option for Newport, the people of Newport and the wildlife in this nationally important reserve.”

This option is welcomed by one respondent concerned about the potential demolition of a listed building which they believe would be required with the other options.

Another respondent suggests that the Do Minimum Scenario should include the planting of vegetation to improve air quality.

“M4 “do-minimum” upgrades should include establishment of tree buffers for pollutant interception for the most-affected people in the corridor.”

5.1.9 Social impacts of the draft Plan, Reasonable Alternatives and Do Minimum Scenario

Further information on the social impacts of the draft Plan and Reasonable Alternatives can be found in the WelTAG Stage 1 (Strategy Level) Appraisal Report available at www.m4newport.com.

Black Route option

Over 150 respondents comment on the potential social impacts of the Black Route option. Many of these discuss the potential proximity of the Black Route to residential areas. About 40 respondents are concerned that the option would affect communities such as Magor, Undy, St Brides and Duffryn. About another five respondents suggest that the Black Route would have a smaller impact on communities than the other proposed options, or that it adequately limits potential impacts.

“[A]ll the routes at J23A come too close to where I live in this village, Magor. There is mention in the comprehensive ‘draft line’ document that noise will affect the Duffryn area of Newport – nothing is mentioned about noise levels at the west side of Magor village and thereabouts.”

Some respondents discuss whether the Black Route would benefit the local community. About five respondents believe that the Black Route option would benefit residents of Newport by providing them with a better road infrastructure. A small number of respondents conversely argue that long-distance travellers rather than local residents would be the primary beneficiaries of the new section of motorway.

Some respondents comment on how the Black Route option might affect residents’ quality of life. This includes respondents raising concern about the Black Route’s impact on the setting of Magor and Undy, and the amount of green space available to Newport residents. Some are specifically concerned that the Black Route would affect recreational use of open space in the Gwent Levels for current and future generations. A small number of respondents believe that

Newport residents' quality of life would improve if the Black Route is built. Several respondents believe that the Black Route option would produce the least amount of disruption to the local area.

While about five respondents express concerns about health impacts of the Black Route, (largely related to the loss of open space for recreation), about ten respondents believe that the route would deliver health benefits. Respondents think the Black Route would result in a reduction of pollution, particularly for the north of Newport, and that it could reduce stress for road users. A few respondents suggest that the Black Route is the option with the least negative health impacts.

“Black is the best option keeping traffic emissions [sic] away from Newport. Also alleviate stress.”

Red Route option

About 100 comments are made in relation to the social impacts associated with the Red Route. Most of these express concern about impacts on the community. Of particular concern to some respondents is the proximity of the Red Route to Newport in general, or to specific parts such as Duffryn (including schools there) or the city centre, and the disruption to these areas it could cause. Some believe that this would reduce the quality of life of people in areas close to the route.

“The negative impact on house prices and quality of life for residents surely outweigh the benefits of this proposed route.”

In contrast, a few respondents believe that the Red Route would have a lower impact on communities than other options. One specific community that respondents think would be less impacted is Magor.

About five respondents believe the Red Route's impacts on the Gwent Levels, and around Tredegar House, would have a damaging impact on local people's enjoyment of the area for recreation. A small number of respondents state that impacts on the Gwent Levels would also impinge on the enjoyment of future generations.

Purple Route option

About 100 respondents discuss the social impacts of the Purple Route. The most significant social issue raised by respondents is the potential impact on the local community, in particular the proposed route's proximity to homes in the communities of Duffryn, Magor and Undy. Additionally, many are concerned about the disruption the route might cause and the impact it could have on the people of Newport and on peoples' quality of life. A number of comments state that the route would have a detrimental effect on recreation facilities and local amenities.

“As this route has a greater adverse affect [sic] on residents and businesses, in my opinion this will not be acceptable, and therefore this route will not produce the necessary overall results required.”

Respondents often specifically mention the Gwent Levels and the various activities that this area is used for. Another concern is the potential proximity to, and impact on schools, in particular Duffryn High School. Some respondents suggest that the motorway could affect pupils' safety and expose them to higher

levels of air pollution. Another respondent believes that the Purple Route would not provide any benefit to the poorest members of society.

Several comments raise concerns about the potential impacts of the Purple Route on people's health. This includes general health and wellbeing, mental health and children's health.

Do Minimum Scenario

About five respondents state that they consider the Do Minimum Scenario to have the least impact on local communities. In particular, some respondents suggest that it would prevent additional disruption on communities such as Undy and Magor while also reducing impacts on those already living alongside the existing M4. A small number of respondents believe that the Do Minimum Scenario would still lead to negative impacts on communities and their quality of life.

About five respondents express concern about the impact of the Do Minimum Scenario on the health of local people. A couple of these respondents note that the Welsh Government's assessment scored the Do Minimum Scenario as the only option with a negative impact in this regard. Alternatively, some respondents argue that the Do Minimum Scenario might free up funding that could then be invested in public transport, walking and cycling. These respondents sometimes suggest that the Do Minimum Scenario could therefore provide a health benefit to the community. A few respondents suggest that such an investment in public transport would improve social equality for the least well off residents of the city.

A couple of respondents discuss the Do Minimum Scenario's impacts for future generations. One respondent believes that pursuing the Do Minimum Scenario instead of other route options would have a highly detrimental long-term impact on the south Wales economy. Another respondent states the importance of protecting the natural environment for future generations.

5.1.10 Complementary measures

In their responses to the consultation, some respondents discuss the complementary measures included in the Black, Red and Purple route options, as referenced in the first three consultation questions. All route options include the following complementary measures:

- M48 – B4245 Link
- Provide cycle friendly infrastructure
- Provide walking friendly infrastructure

The Black and Purple Routes also include the complementary measure of reclassifying the existing M4 between Magor and Castleton as a trunk road. For more details on the complementary measures, see Table 1.1.

General comments on the complementary measures

About 15 respondents discuss the complementary measures in general, and many of these are supportive, although one suggests that they do not go far enough.

“The complimentary measures will provide benefits, particulrly [sic] the M48 – B4245 Link which would increase use of Severn Tunnel Junction and the M48.”

A few respondents argue that the complementary measures on their own would have a sufficiently positive impact on traffic in the region, so no further measures are required.

Some respondents oppose the complementary measures, though only a few provide details regarding their opposition.

Reclassify existing M4

A handful of respondents express support for the complementary measure of reclassifying the M4 between Magor and Castleton, suggesting that this would have positive economic impacts and noting the further opportunity to reopen the eastbound slip road at Caerleon Road.

Other respondents oppose reclassifying the road, often suggesting that doing so would lead to more congested roads and longer journey times. Most of these respondents suggest both the existing motorway and a new route are needed to adequately alleviate traffic problems. Alternative and additional suggestions to this complementary measure are discussed in section 5.1.11.

M48/B4245 link

Many respondents support a new single carriageway link between the M48 and B4245, as laid out in the complementary measures. One respondent suggests that the link must work two ways to adequately address congestion issues, while another argues that a designated junction for Caldicot should be provided.

One respondent cautions that the route should be designed to ensure it does not prevent future transport links between Severn Tunnel Junction and Magor and Undy. Another adds to this, believing that the link would need to relate to plans for a park and ride scheme at Severn Tunnel Junction. One respondent argues that the M48/B4245 link is a good idea but doubts that it would significantly affect traffic flow in Newport.

Providing cycle-friendly and walking-friendly infrastructure

A number of respondents support the complementary measure of promoting cycling as an alternative to the car for journeys up to three miles, by providing or improving infrastructure. Several respondents argue that promoting cycling would reduce congestion and contribute to better health.

In contrast, several other respondents express disagreement with providing cycling infrastructure, suggesting that this would not result in a modal shift or would not reduce traffic congestion. One respondent opposes the complementary measures relating to cycling and walking because they would not benefit small villages and hamlets.

A few respondents also question the feasibility or likelihood of cycling and walking infrastructure being introduced.

5.1.11 Alternative, or additional approaches to the ‘draft Plan and Reasonable Alternatives’

In their responses to the consultation, some respondents discuss ideas for improving transport around Newport that are not part of the proposals put forward for consultation. These include alternative routes; traffic management, traffic

demand management measures and other road improvements that could be used instead, or in addition to, the proposed routes; and alternative modes of transport, including public transport, walking and cycling.

All alternatives submitted during the consultation have been considered and are appraised in a Strategic Appraisal of Alternatives Report¹⁶, which accompanies this Consultation Participation Report. The Strategic Appraisal of Alternatives Report considers in more detail alternative or additional approaches, as put forward during the consultation.

Alternative routes and route alignments

Further information alternatives suggested during the consultation can be found in the Strategic Appraisal of Alternatives Considered during draft Plan Consultation Report available at www.m4newport.com.

About 120 respondents believe that the existing major roads around the southern perimeter of Newport, namely the A4810 (Steelworks Access Road) and the A48 (Southern Distributor Road), could form the basis of a viable alternative to the Black, Red and Purple Routes, particularly if the roads were widened or upgraded.

“Can’t you consider the option of enhancing this road slightly and others in the [N]ewport area and then advertising it as an alternative route if you are going to Cardiff. I think this is another option and it should be looked into.”

Some respondents suggest that these two roads have the potential to provide the required additional capacity. A few respondents suggest that improvements to these roads have only recently been completed, and that more time and assessment is required in order to determine what impact these improvements make. Some respondents believe that the A48 particularly is underused, partly because of a lack of awareness of it by drivers. Some respondents argue that better signage is one way to get more traffic to divert onto the A48.

Similarly, a significant number of comments state their support for what is often described as the Blue Route. The Blue Route is the name of a specific set of upgrades to the A4810 and A48 proposed in the ‘The Blue Route’ report by Professor Stuart Cole for the Institute of Welsh Affairs (IWA) and Chartered Institute of Logistics and Transport. Some interest groups have publicly endorsed this alternative and promoted it in the media. As such, it has received a significant amount of publicity (see section 4.2 for information on the Blue Route campaign). Respondents in favour of this alternative believe that it would deliver sufficient additional road capacity while being significantly cheaper and quicker to build than the proposed Route options. Some respondents also suggest it would be more sustainable and environmentally friendly. The Blue Route is appraised in the Strategic Appraisal of Alternatives Report.

A small number of respondents also suggest incorporating a new section of motorway into a barrage in the River Severn which would then act as a source of energy and as a means of flood defence.

¹⁶ M4 Corridor around Newport Strategic Appraisal of Alternatives Considered during draft Plan Consultation Report (July 2014). Available to download from www.m4newport.com

Modifying the existing M4

Further information alternatives suggested during the consultation can be found in the Strategic Appraisal of Alternatives Considered during draft Plan Consultation Report available at www.m4newport.com.

About 150 respondents suggest ways in which the current M4 motorway could be improved. For some respondents, these changes are advocated as a way of avoiding the need to build a new route. Other respondents suggest changes as a way to make the current M4 motorway a more useful alternative or secondary route around Newport.

Some respondents advocate the widening and upgrading of the existing M4 to create a road with the required capacity, including the widening of the Brynglas tunnels (as considered under the M4 Corridor Enhancement Measures programme)¹⁷. Many advocate this as a means to avoid impacting on the Gwent Levels. Some respondents suggest traffic flows could be improved on the existing M4 by closing several of the junctions in the city, in order to reduce its usage by local traffic.

“As an alternative to the new route I would also support the widening, tunnelling and straightening of the current route although this would clearly cause immense disruption. I cannot understand why the option of widening the tunnels by demolition, cutting and covering is not assessed.”

Other respondents consider the status of the existing M4 route if it was complemented by a new section of motorway or dual carriageway. A number of respondents challenge the proposal to reclassify the existing M4 route to a non-motorway classification (see section 5.1.10 for further information about the proposed complementary measures), stating that having two motorways around Newport would both increase capacity and provide resilience in situations where one of the motorways needed to be closed. Some respondents also remark that the new route could be incorporated into the M48, enabling the infrastructure to continue to serve a valuable role, while being distinct from the existing M4 itself. Another respondent is concerned that reclassifying the existing motorway might disadvantage residents to the north of Newport.

“As for the proposal to downgrade the present M4 to a Major Road would be a retrograde step in as much [as] it would allow all manner of vehicles to use the stretch of road.”

One respondent opposes having two motorways around Newport. This respondent states that if a new section of motorway is built then the existing one should be dismantled altogether rather than be downgraded.

Several respondents state that a reclassified M4 would be a useful link as a local-only route for traffic travelling within Newport and to or from the Valleys. Several respondents request that as part of this complementary measure, the currently closed Junction 25 be reopened to traffic in order to improve local traffic flows and journey times.

“Reopening the [C]aerleon motorway exit or creating a new one to connect into Heidenheim Drive would also have a significant impact on Newports traffic flow”

¹⁷ See www.m4cem.com

Traffic management solutions

Further information alternatives suggested during the consultation can be found in the Strategic Appraisal of Alternatives Considered during draft Plan Consultation Report available at www.m4newport.com.

About five respondents suggest banning lane changes as an alternative measure, believing this could address the safety issues on the M4. Others express more general support for better integrated traffic management as a method to better manage traffic flows, especially at peak periods. Specific suggestions include speed controls, better signage and greater provision to drivers of information and advice on current traffic conditions, variable speed limits, and traffic calming measures. Several respondents state that they would like to see greater enforcement of road regulations and speed limits, in particular an increased use of police patrols.

“A system for speed and volume management on the M4 should be included, extending the active control system much further east along the M4 to encourage use of the new relief road. I am influenced in route choice by the forecast times to the next junction that have been introduced on the M4 around Reading. Such advice would need to be given as the Severn is crossed.”

A small number of respondents advocate the introduction of road pricing on the M4 as a way to manage peak time traffic levels.

Public transport and other transport modes

Further information alternatives suggested during the consultation can be found in the Strategic Appraisal of Alternatives Considered during draft Plan Consultation Report available at www.m4newport.com.

Approximately 275 respondents comment on the role public transport might play in improving transport in South Wales, with many expressing support for greater public transport provision. Respondents are often critical of the level of public transport provision currently available into, around and past Newport, with some suggesting that at present public transport is not a viable alternative to car use. Many respondents state that improving the public transport network could be successful in solving problems on the M4, such as congestion.

“It’s about time that the scope for radically improved public transport was brought back onto the agenda as a significant [sic] and viable alternative to the projected rise in car use.”

The proposed Cardiff Capital Region Metro is one specific scheme that attracts significant support as a means of reducing demand for roads. Some note that the anticipated cost of the scheme would be similar to that of the proposals for the M4. This leads some respondents to suggest that this scheme should be funded with the money earmarked for the M4. Others believe that the draft Plan proposals will compliment these other schemes.

“We have a once-in-a-lifetime golden opportunity to do something that will provide benefits extending well into the future; unlike many previous efforts this one does predict future increases and will fit in well with any local strategies to improve transport facilities (park-and-ride, metro, new railway stations) already under consideration.”

Other respondents discuss more generally a desire to improve rail services in the region. It is suggested that this could reduce the need for additional road capacity. This includes regularity of service, cost and the construction of additional stations, for example at Magor, Caerleon and Llanwern. The recently re-opened Ebbw Vale line is referenced by respondents as an evidence of latent demand for rail services in the region.

Respondents also encourage improving bus services as a means to reducing demand for roads, and integrating them with rail services. Some respondents also advocate efforts to transport more freight by rail rather than road.

Several respondents discuss improvements to air travel, and the role this might have as part of a wider package of infrastructure measures for Wales. Some respondents argue that an international airport is required to unlock Wales' full economic potential. Some of these respondents believe that the plans for the M4 should factor in potential new airport provision at Newport or around Cardiff so that the two pieces of infrastructure could be properly integrated.

“The Metro is a potential major project, which I have been involved with. However, in my view the Metro is about travel ‘within the region’ rather than travel to the major markets of England”

Demand management

Further information alternatives suggested during the consultation can be found in the Strategic Appraisal of Alternatives Considered during draft Plan Consultation Report available at www.m4newport.com.

Some respondents discuss other strategies to reduce the number of vehicles using the M4. Respondents' suggestions include provision of park and ride schemes, and car share schemes with colleagues or friends. Several comments suggest increased use of flexible working would help to manage peak flows of traffic.

5.2 Representations from key stakeholders

This section summarises responses received from key stakeholders in response to the M4 Corridor around Newport draft Plan consultation. A fuller report of responses can be found in the Full Factual Report prepared by Dialogue by Design, included in Appendix A1, and a list of key stakeholders, grouped in categories of their type, is provided in Appendix A14. In summary, key stakeholders are considered to include statutory consultees, and those with a particular stake or significant interest in transport issues relevant to the economy, environment and society in South Wales and beyond.

No additional weight is afforded to responses from key stakeholders, compared to responses from other individuals and organisations. The purpose of identifying key stakeholders is to assist the Welsh Government in recognising the views of key stakeholders, who often represent the views of their members or constituents, in a separate context to views expressed by individuals and other organisations.

Many stakeholders provide general comments in response to the consultation that do not address a specific aspect of the Welsh Government's proposals, or are repeated for the three route options. These comments are summarised in this section along with other detailed comments on specific aspects of each proposal.

5.2.1 The present transport network in, and around, Newport

This section provides a summary of stakeholders' views on the present transport network in and around Newport. While there was no consultation question inviting views on the existing network, many responses include comments reflecting on it, which are summarised here for completeness.

Further information on the transport network can be found in the WelTAG Stage 1 (Strategy Level) Appraisal Report available at www.m4newport.com.

A number of stakeholders comment on the current state of the transport network in South East Wales. Most criticise the existing infrastructure and highlight problems associated with it. In contrast, some stakeholders support aspects of the present transport network, suggesting there are no problems with the existing infrastructure.

Some stakeholders comment that measures to alleviate congestion are already in place, including variable speed limits and the implementation of a managed motorway. Gwent Wildlife Trust suggests that the combined impact of such measures will be significant, while variable speed limits have already improved traffic flow. The Institution of Civil Engineers (ICE) Wales on the other hand believes that a managed motorway scheme will not offer a long-term solution. Several stakeholders suggest that the measures have only been in place for a short period and more time is needed to assess their effectiveness. Similarly, South East Wales Transport Alliance (SEWTA) argues that the proposals do not take account of the benefits of committed investment programmes for public transport. Some stakeholders also raise concerns about the number of junctions on this part of the M4, suggesting there are too many junctions in close proximity.

A number of stakeholders express concerns about problems arising due to the inadequacies of infrastructure previously mentioned. They refer to the problems outlined by the Welsh Government such as capacity, safety and resilience.

“The road lacks continuous hard shoulders, has closely spaced junctions with sub-standard slip road visibility and narrows to a restricted two lane section through the Brynglas Tunnels.” Confederation of British Industry (CBI)

Of particular concern to certain stakeholders is congestion. While a small number of stakeholders suggest congestion is not an issue, most stakeholders believe congestion is a problem and believe that something needs to be done.

“WTW does recognise that congestion on the M4 is an issue and that additional capacity is required.” Wildlife Trusts Wales

Most comments regarding congestion on the M4 around Newport are general and simply acknowledge congestion as an issue. Some stakeholders make detailed comments about congestion, including reflections on its causes. Several suggest that usually congestion is not due to long-distance traffic, as a large proportion of trips on this section of the M4 are by local vehicles. A few stakeholders, including Jessica Morden MP, emphasise concerns about congestion around the Brynglas Tunnels during peak times.

“We are aware that there is severe traffic congestion on M4 in the Newport area, especially affecting the stretches of road approaching the Brynglas tunnel, and at peak travel-to-work times.” Church Action for Sustaining the Environment

These stakeholders suggest the M4’s narrowing from three lanes to two approaching the Brynglas Tunnels and the close proximity of many junctions are contributing to the problem of congestion. Several stakeholders emphasise that congestion is limited to peak times and that at other times during the day the existing M4 is adequate.

A number of stakeholders think the current road network has insufficient capacity and say that additional capacity may help reduce congestion and other problems. Several stakeholders express concern about the safety of the current road network, suggesting incidents often occur around the Brynglas Tunnels.

“More congested road conditions create a greater risk of incidents and collisions. The most common collision zone has been identified as between junction 25 and 28 on the approach to Bryn Glass [sic] tunnels.” Association of Chief Police Officers (ACPO) Cymru

Various stakeholders think the resilience of the local road network is inadequate, arguing incidents often cause congestion, with some specifying that this is compounded by a lack of alternatives to the M4.

A number of stakeholders believe local businesses and the economy are negatively impacted by congestion on the M4 around Newport, saying congestion and unreliable journey times can increase costs for businesses and hinder development in the region.

“SWWITCH believes that the current capacity of the M4 around Newport is detrimental to economic regeneration and inward investment in [S]outh West Wales.” South West Wales Integrated Transport Consortium (SWWITCH)

Among other concerns about the current situation, stakeholders mention noise and air pollution associated with road traffic. They suggest air quality within the Newport area is an issue. The Institution of Civil Engineers (ICE) Wales refers to the Welsh Government’s obligation to improve air quality.

“Air quality is a huge issue along the M4 and a key reason for trying to mitigate for all the traffic congestion in the area.” Public Health Wales

Some stakeholders suggest that congestion has health implications for residents, both from air quality and from stress.

5.2.2 Need Case for the draft Plan and Reasonable Alternatives

Further information on the need case for the draft Plan can be found in the WelTAG Stage 1 (Strategy Level) Appraisal Report available at www.m4newport.com.

Stakeholders’ views on the need case for the proposals set out by the Welsh Government are split with some accepting and others opposing it.

Traffic Growth and Traffic Modelling

Several stakeholders discuss the traffic growth projections provided. A few (mostly transport organisations) agree with these, while various others (including environmental groups) say they are inaccurate or do not adequately demonstrate the requirement for the proposals.

“ICE Wales Cymru considers that there is a proven need for the provision of a new motorway to alleviate the problems and resolve the issues.” The Institution of Civil Engineers (ICE) Wales Cymru

“We also believe that the traffic forecasts used to underpin this investment are flawed, suggesting a significant increase in traffic when current trends suggest this is extremely unlikely.” Chartered Institute of Logistics and Transport

Some stakeholders add further caveats to the traffic growth projections, citing increasing motoring costs and falling wages, suggesting that it is unlikely there would be any significant traffic increase in the future and that this undermines the need case.

Additionally, some stakeholders argue that the projections do not accurately reflect future implications of public transport improvements, such as electrification of the rail network and the proposed Cardiff Capital Region Metro, and the increasing popularity of cycling and walking.

When considering the Red Route option, South Wales Trunk Road Agency maintains that motorists would continue to use the existing M4, as they believe that the Red Route is unlikely to provide a viable alternative for the majority of through traffic.

5.2.3 Cost of the draft Plan, Reasonable Alternatives and Do Minimum Scenario

Further information on costs will be provided within the Business Case, should the Welsh Government decide to adopt the draft Plan, with or without amendment.

A number of stakeholders comment on the cost of the proposals and the funding mechanisms in place both generally and for specific options. A few stakeholders express concern that this project might dominate the Welsh Government transport budget spend to the detriment of other important schemes.

“The Welsh Government has suggested that this would be funded by new borrowing powers granted by the UK Government. We have concerns that the Welsh Government would be disproportionately and excessively using their borrowing powers to fund a single project in a single region, rather than a range of projects across Wales to improve infrastructure.” Welsh Liberal Democrats

Various stakeholders comment on the cost of the Black Route option. The Chartered Institute of Logistics and Transport states that it is not an appropriate investment for the Welsh Government, and that the money could be used more effectively elsewhere. Some stakeholders, including the Welsh Liberal Democrats, think the Black Route option would not provide value for money.

The RAC Foundation thinks that, of the two proposed motorway-standard options, the Black Route option is more advantageous at a similar cost, while Sustrans

Cymru considers that the cost of the Purple Route option would be different to that of the Black Route option due to the different crossings over the River Usk.

SEWTA suggests that despite its two-lane design, the cost of the Red Route option would be similar to the three-lane Black and Purple Route options, stating this makes the Red Route option less cost effective. Meanwhile, the RAC Foundation believes that the Red Route would be considerably cheaper than other options, while still sufficiently improving the road network. Newport City Council suggests that the potential for a phased construction might make the Red Route option easier to fund.

Goldcliff Community Council opposes the Do Minimum Scenario, but highlights the significant difference in cost between this option and the route options, saying intermediate options might be considered.

5.2.4 Design and construction of the draft Plan and Reasonable Alternatives

Further information on the design and construction of the measures set out in the draft Plan will be provided as part of scheme level appraisal, should the draft Plan be adopted, with or without amendment.

Comments regarding design and construction include ensuring that the road:

- carefully considers any disruption to the port, both during and after construction, and particularly in relation to height of the River Usk crossing;
- is located away from high flood risk areas; and
- avoids visual and noise impacts on communities and landscape.

Several stakeholders discuss the timescales for delivering the proposals, with some saying that the construction should be completed as soon as possible. They also raise concerns about the potential impacts of the construction phase.

Stakeholders express a range of views about junctions, some suggest junctions in specific locations, such as near the docks, would be beneficial and others argue that it would be preferable to minimise junctions. One comment suggests the proposals lack detail.

“Junction arrangements for the [P]urple [R]oute are not shown so it is not possible to take an informed view on the balance of traffic types that would use it.” RAC Foundation

Stakeholders also discuss whether tolls should be raised on any new road.

Comments which were provided with regard to specific options are discussed below.

Black Route option

When considering the Black Route option, several stakeholders comment specifically about junctions. A few advocate limiting junctions between the Black Route and the local road network to prevent its use by local traffic whilst others, such as Orb Electrical Steels, suggest they would welcome junctions in specific locations to help remove a large quantity of heavy goods traffic from the A48, and

benefit their own transport manoeuvres. Newport City Council says there should be at least three junctions (east, west and central) to ensure Newport benefits economically from the new road.

Newport City Council also stresses the importance of carefully designing the approach and access to Newport, maximising its visual appeal.

The RAC Foundation argues that the Black Route is straighter and more direct than the Purple and Red Routes which they believe makes it the safest of the proposed routes.

Red Route option

Some stakeholders support a phased approach to construction if this helps Welsh Government manage their transport budget. While recognising the potential funding benefits of a phased delivery, Newport City Council is concerned that such an approach risks prolonging disruption and reducing business confidence.

The South West Wales Integrated Transport Consortium considers that while the Red Route passes close to land designated for commercial development, no additional junctions should be provided to access these sites, as this could hamper the effectiveness of the road as a strategic transport connection.

Purple Route option

Stakeholders make a small number of comments regarding the design and construction of the Purple Route option.

Tata Steel UK suggests a junction should be located east of the River Usk, while the South West Wales Integrated Transport Consortium is concerned junctions may detract from the strategic nature of the Purple Route option.

Do Minimum Scenario

The National Trust highlights the limitation of construction impacts if the Do Minimum Scenario was favoured.

"The "[D]o [M]inimum" scenario avoids the large and moderate adverse impacts that arise for all of the options based on new road construction." Ymddiriedolaeth Genedlaethol / National Trust

5.2.5 Economic impacts of the draft Plan, Reasonable Alternatives and Do Minimum Scenario

Further information on the economic impacts of the draft Plan and Reasonable Alternatives can be found in the WelTAG Stage 1 (Strategy Level) Appraisal Report available at www.m4newport.com.

Black Route option

Stakeholders who discuss the impacts of the Black Route option on the economy generally focus on the impact on Newport and think that this route option would not benefit the local economy. Stakeholders suggest that there is a danger that the Black Route option could act as a bypass to the city centre, and that it would hamper the city in maximising the economic potential of the scheme. Several

stakeholders, including Newport City Council, argue that the city faces economic challenges and that regeneration efforts are on-going.

Some stakeholders register particular concern about the impact of the Black Route option's River Usk crossing, which they say would affect operation of docks and ports, ultimately resulting in trade moving to other ports.

"If the road is at a height that does not allow us to bring vessels into the North Dock then we will risk losing business and/or increasing costs[,] both factors which might materially affect our future." W E Dowds (Shipping) Ltd

Torfaen County Borough Council believes that proximity to the motorway network is key to their area's economic prosperity. They are concerned that the proposed reclassification of the existing M4 could negatively affect economic regeneration in Torfaen.

As discussed in Section 5.2.2, some stakeholders believe a new section of motorway is important for the economic prosperity of South Wales.

"As for a re-routed M4 on the Black Route, we believe that a faster, trouble free, road journey is essential for the economy of Wales [...] We urge you to move ahead as quickly as possible before Wales becomes a backwater." Severn Tunnel Action Group (STAG)

A few stakeholders are concerned that the Black Route option could affect use of the Gwent Levels area as a recreational, tourist and educational area, and that it could disrupt footpaths and cycleways in the Gwent Levels.

Red Route option

Some stakeholders, including transport and environmental organisations, believe the Red Route option would not benefit the local economy. For example, Marshfield Community Council states that the Red Route option would not be a sufficient improvement to benefit existing businesses, or attract new businesses to the area. Chepstow Friends of the Earth says that the Red Route would bypass Newport, bringing no economic benefit to the city but instead aiding the fortunes of Cardiff, Bristol and the Midlands.

Some stakeholders mention impacts the Red Route option could have on several specific sites, industries and businesses, including operational impacts on the docks resulting from the crossing of the Usk, and impacts on the Dock's Way Landfill site.

"May I hereby lay down my rejection in full to the 'Red Route' as it would mean having to fully relocate my business and operations" Island Steel (UK)

Purple Route option

Some stakeholders think the Purple Route option would not benefit the local economy, while Newport City Council believes it could benefit the local economy and aid regeneration, depending on the approach to junctions that is determined. Stakeholders specify that the Purple Route option may have negative impacts on future developments, tourism and the landfill site. Their comments highlight that the Purple Route would cut into land allocated for development and that tourism may be affected due to the Purple Route's impacts on the Gwent Levels.

Several stakeholders mention the Purple Route option's impact on the Newport Docks. While stakeholders generally acknowledge there may be some impact on the docks, some suggest this would be smaller than the impact of other route options. However, stakeholders such as Tata Steel UK Ltd and Island Steel (UK) make detailed comments about the implications the Purple Route option could have on the docks and their operations. Among others, they specify concerns about the location of junctions, the height of a new bridge and the influence on daily operations, with Island Steel (UK) claiming this would result in the requirement to relocate the business.

Do Minimum Scenario

Stakeholders who comment on the economic impacts of the Do Minimum Scenario commonly assert that the Do Minimum Scenario would be detrimental to the local or Welsh economy, including the tourist industry. Some stakeholders consider it to have worse economic impacts than all three of the proposed route options.

“Doing nothing could risk damaging the local and broader Welsh economy.”
Automobile Association (AA)

5.2.6 Environmental impacts of the draft Plan, Reasonable Alternatives and Do Minimum Scenario

Further information on the environmental impacts of the draft Plan and Reasonable Alternatives can be found in the WelTAG Stage 1 (Strategy Level) Appraisal Report, Strategic Environmental Assessment and Consideration of the options in relation to the requirements of the Habitats Regulations Report, available at www.m4newport.com.

Black Route option

A number of stakeholders, largely from environmental and political organisations, state that they are concerned about the general impacts of the Black Route option on the environment, with South Wales Mammal Group noting the importance of the Gwent Levels for nationally and internationally important species. In contrast, a few stakeholders, including local authorities and transport organisations, believe that the Black Route option would reduce emissions to some extent, or more effectively than other route options. In addition, the Institution of Civil Engineers (ICE) Wales suggests that with thoughtful planning it might be possible to make a positive contribution to the quality of the protected or designated areas.

“Whilst the Black route traverses SSSI designated land, suitable and proportionate measures are proposed as part of the overall package. ICE Wales Cymru considers that it may be possible for the project to include further environmental measures that could even enhance the SSSI areas, i.e. instead of a detrimental effect, the project could have net positive benefits by enlarging the area of the SSSI.” The Institution of Civil Engineers (ICE) Wales

Stakeholders' concerns regarding environmental impacts often focus on the Gwent Levels, specifically on impact on protected or designated areas and on wildlife and habitats. For many stakeholders these potential impacts form the cornerstone for their opposition to the Black Route option. The Green Party describe the route as an environmental disaster due to these impacts.

“Claims for any environmental benefit from this route are tendentious in the extreme, but one certain outcome if this road is built is permanent and irreparable harm to the Gwent Levels and its biodiversity.” Chepstow Friends of the Earth

Concerns about environmental impacts include fears that the Black Route option would fragment the Gwent Levels (Buglife – The Invertebrate Conservation Trust), isolating and reducing wildlife populations (Gwent Wildlife Trust). Some stakeholders emphasise the ecological value of the reens and watercourses of the Gwent Levels, with some expressing concerns that the Black Route would act as a barrier, limiting and changing the flow of water across the Gwent Levels. Concerns that a road alongside the reens could expose them to pollution, particularly when accidents involving spillages occur, are also expressed.

A few stakeholders express concern that the Black Route option would affect the capacity of the Gwent Levels to serve as a flood plain or natural flood defence. They suggest that areas categorised as high flood risk hazard should be avoided.

Several stakeholders express concern about the Black Route option negatively affecting the landscape of Newport, South Wales and the Gwent Levels. Cadw says this route option would require one scheduled monument to be moved and a Grade II building to be demolished. Campaign for the Protection of Rural Wales suggest that the road would open up the Gwent Levels to additional development.

Several stakeholders discuss environmental mitigation. A few, largely transport organisations, express confidence that mitigation is possible, or that the proposed measures are suitable and sufficient.

Some stakeholders, mostly environmental and transport organisations, suggest that the Black Route option does not fit with the Welsh Government’s policies in relation to improving sustainability and reducing greenhouse gas emissions.

Natural Resources Wales (South Operations Directorate) believes that all route options would have a similar impact on the landscape and query the variations in the Welsh Government’s assessments.

Red Route option

A variety of stakeholders express concern about the environmental impacts of the Red Route option, with several referring directly to the assessments by the Welsh Government.

Many environmental as well as civil society and transport organisations stakeholders emphasise concerns about the Red Route option’s impact on the Gwent Levels and its designated and protected areas, wildlife and habitats. Similarly to the Black Route option, stakeholders are concerned about the potential loss of a proportion of area of the Gwent Levels as well as the perceived fragmenting effect that the route would have. They believe that this would create a barrier and isolate parts of the Gwent Levels, and their species, from the wider area.

“This route would seriously fragment the Gwent Levels wetland system... The Gwent Levels is one of the largest areas of ancient grazing marsh and reen systems in Britain, a fragile system vulnerable to changes in water levels, flow and pollution.” Buglife (The Invertebrate Conservation Trust)

Several stakeholders think the Red Route option would affect rivers and watercourses. One comment emphasises the importance of the Gwent Levels in supplying water and preserving its quality, which stakeholders say should be highlighted in impact assessments.

Stakeholders also register concern about the Red Route option's potential impact on the River Usk and the Usk Special Area of Conservation (SAC). Some stakeholders express concern that this route option might increase the risk of flooding on the Gwent Levels, questioning whether this impact has been sufficiently assessed.

Other concerns expressed include impacts on cultural heritage, with the scheduled monument of Castell Glas Castle Mound (near Maes Ebbw School, Newport) being specifically mentioned, and the potential loss of areas of ancient woodland associated with the Red Route option.

In contrast, some stakeholders suggest that environmental and landscape impacts of the Red Route option would be minimal or lesser than other options.

Purple Route option

As with the other route options, when considering environmental impacts of the Purple Route option, several stakeholders make reference to the irreversible damage they believe the Purple Route option would have on the Gwent Levels and associated SSSI's and SAC.

"Putting a motorway across multiple SSSIs with the inherent damage due to construction, plus issues with run-off and upsetting the ecological and hydrological balance of these important habitats should not be permitted when there are other alternative routes." Wildlife and Countryside Services

However, Newport Liberal Democrats believes the Purple Route option would have a lesser impact on the St Bride's SSSI than other route options.

Several stakeholders express concern about the Purple Route option's negative impact on biodiversity and wildlife in the Gwent Levels. Concerns include habitat destruction, increased pollution. Stakeholders highlight the presence of important species such as water voles in the area, expressing concern that the Purple Route option may be detrimental to the survival of these species.

Again, stakeholders comment on the wetlands and reens found within the Gwent Levels, highlighting the unique importance of these ecosystems and expressing concerns about the detrimental impact that the Purple Route option would have on these fragile ecosystems, through severance and increased pollution. The Association of Chief Police Officers (ACPO) Cymru expresses concern that the Purple Route runs through a flood plain, suggesting that flooding may amplify pollution and run-off. Stakeholders also raise concerns about increased noise pollution and impacts on the Docks Way Landfill Site and Castell Glas Castle Mound associated with the Purple Route option.

Do Minimum Scenario

Only Cadw refers to the environmental impacts of the Do Minimum Scenario. They argue it would have limited or no impact on the historic environment resource.

5.2.7 Social impacts of the draft Plan, Reasonable Alternatives and Do Minimum Scenario

Further information on the social impacts of the draft Plan and Reasonable Alternatives can be found in the WelTAG Stage 1 (Strategy Level) Appraisal Report available at www.m4newport.com.

Black Route option

Concerns regarding possible social impacts of the Black Route option include:

- the road might act as a barrier severing communities from each other and from services and amenities;
- residents close to the proposed Black Route would suffer considerable disruption and disturbance; and
- impact on cyclists, considering the importance of the Gwent Levels as a route for cyclists undertaking local and long-distance travel.

A few stakeholders argue that in comparison to other options, the Black Route option would be less destructive and reduce the proximity of traffic to residential areas, whilst others note that benefits accruing from the Black Route option, such as improved journey times, only apply to car owners, and that there are no benefits to economically deprived groups.

Marshfield Community Council accepts the assessment of health impacts and welcomes the anticipated benefits.

“[T]he Draft Plan has no adverse health impacts and several areas of improvements and welcomes these gains to the local environment.” Marshfield Community Council

Red Route option

Several stakeholders raise concerns about the proximity of the Red Route option to residential areas of Newport. Some stakeholders mention Duffryn in particular, often expressing concerns about the disturbance this community might experience and the Red Route option’s impacts on its schools and the health of their pupils.

“[T]he Route will have a more direct effect on the population of Newport by bringing the road closer to residential areas, particularly in Dyffryn [sic]. This option is indicated as following a route close to the local schools which will have a number of environmental and public health impacts.” Newport City Council

Gwent Wildlife Trust believes that the impacts on the Gwent Level’s role as an area of recreation, education, health and wellbeing have not been adequately assessed.

Purple Route option

Comments regarding the social impacts of the Purple Route option are similar to those raised for the Red Route option, including concerns about its potential impact on the local community, particularly considering its proximity to homes in Duffryn as well as Duffryn High School. Some stakeholders think the Purple Route option would negatively impact residents’ quality of life, as well as their health. Also, similarly to both other route options, some stakeholders suggest the

Purple Route option may adversely affect recreation and amenity, with CTC Cymru highlighting the importance of the Gwent Levels as a local cycling destination.

In contrast, Newport Liberal Democrats suggests the Purple Route option offers the most significant health benefits of the proposed route options, due to the reduction in air pollution they believe it would offer.

Do Minimum Scenario

Discussing the social impacts of the Do Minimum Scenario, Newport Liberal Democrats notes that a greater negative impact on equality occurs under the Do Minimum Scenario compared to the proposed route options. However, this is disputed by Friends of the Earth Cymru, who also express concern about the scoring of the physical fitness criterion for the Do Minimum Scenario.

“We note that the only significant negative equalities impact comes from the do minimum scenario.” Newport Liberal Democrats

5.2.8 Complementary measures

In their responses to the consultation, some stakeholders discuss the complementary measures included in each of the route options, as referenced in the first three consultation questions. All route options include the following complementary measures:

- M48 – B4245 Link
- Provide cycle friendly infrastructure
- Provide walking friendly infrastructure

The Black and Purple Routes also include the complementary measure of reclassifying the existing M4 between Magor and Castleton as a trunk road. For more details on the complementary measures, see Table 1.1.

General comments on the complementary measures

A few stakeholders express support for the complementary measures in general because they believe they would improve accessibility, including to public transport facilities.

“The complementary measures are helpful to the city of Newport. They maintain access to the city from both the existing M4 (as a re-designated road) and from the Southern Distributor Road, A 48.” Newport Liberal Democrats

One stakeholder, Marshfield Community Council, maintains that the complementary measures should be given equal importance to ensure that wider negative effects of the new road are minimised.

Reclassify existing M4

Newport Liberal Democrats welcomes the reclassification of the existing M4 from Magor to Castleton. However, Torfaen County Borough Council expresses reservations that reclassifying the M4 would result in the perception that Torfaen is further from the motorway network and this, ultimately, could hinder economic growth in the county. The Council therefore prefers the existing M4 maintain its

classification. The Freight Transport Association emphasises the strategic importance of the existing M4 and argues to maintain this if a new section of motorway would be built.

“The Freight Transport Association believes that if a new motorway standard road is built to replace the existing M4 around Newport then the M4 should remain a strategic part of the Welsh road infrastructure. The two routes would provide alternatives in times when the network is under stress.” Freight Transportation Association

South Wales Fire & Rescue Service notes that appropriate investment in Brynglas Tunnels is needed to align them with comparable current road tunnel safety standards.

B4245/M48 link

A small number of stakeholders mention support for a connection between the M48 and B4245. In particular, Network Rail proposes a park-and-ride facility at Severn Tunnel Junction as a potential complementary measure. This is supported by Magor Action Group on Rail and Act Travelwise (who promote sustainable travel choices). Act Travelwise also suggests that either this facility include a freight consolidation centre or greater use of the Wentloog rail freight terminal is promoted. Meanwhile, Newport Liberal Democrats observes that the introduction of a link from the M48 to Severn Tunnel Junction would greatly help the integration of road and public transport. Jessica Morden MP indicates that many of her constituents would be supportive of the link road.

“Park and ride facility at Severn Tunnel Junction is essential. This could include a freight consolidation centre; alternatively promote greater use of Wentloog Rail Freight Terminal.” Act Travelwise

Cycle/walking-friendly infrastructure

A few stakeholders express support for providing new or improving existing infrastructure that promotes cycling and walking as an alternative to the car. One of these stakeholders, Monmouthshire County Council, states that the final proposals should retain and enhance such infrastructure’s convenience and amenity for users.

“SWWITCH is very supportive of the opportunity to provide strategic walking and cycling infrastructure as part of this project and [it] would be an excellent signal of intent in support of the Active Travel Bill on the part of the Welsh Government.” South West Wales Integrated Transport Consortium

5.2.9 Alternative, or additional approaches to the draft Plan and Reasonable Alternatives

Some stakeholders discuss other approaches to improving traffic movement and transportation around Newport. These approaches include options such as alternative routes; traffic management; improvements to existing roads and infrastructure. Stakeholders also discuss measures that complement the proposals, such as those related to public transport, walking and cycling.

All alternatives submitted during the consultation have been considered and are appraised in a Strategic Appraisal of Alternatives Report¹⁸, which accompanies this Consultation Participation Report.

Further information on the alternatives suggested during consultation can be found in the Strategic Appraisal of Alternatives Considered during draft Plan Consultation Report available at www.m4newport.com.

Alternative routes and route alignments

A few stakeholders discuss preferences for an alternative route. Some stakeholders suggest generally that they would like to see a different or less intrusive route. Goldcliff Community Council specifically recommends a relief road for traffic in one direction to the north of the existing M4 should be considered, which they suggest would allow traffic moving in the other direction to use the existing lanes through both of the Brynglas Tunnels.

The Wildlife Trusts Wales recommend choosing alternative routes that are cheaper, more sustainable and do not have detrimental impacts on the environment. Goldcliff Community Council states that options that improve the flow of traffic on the M4 and within Newport should be considered further. A few stakeholders also suggest that the Welsh Government should look more holistically and consider an integrated approach to traffic and transport issues.

Many stakeholders, including transport organisations, private sector, business and regeneration organisations, environmental organisations, political organisations and individuals, support what they often refer to as the Blue Route, which is a specific set of upgrades to the A4810 and A48 proposed in a report by Professor Stuart Cole for the Institute of Welsh Affairs (IWA) and Chartered Institute of Logistics and Transport. Stakeholders who favour this alternative maintain that it would deliver additional road capacity, be more sustainable and environmentally friendly, cost less, and be built more quickly than the proposed route options. Several stakeholders have actively endorsed the Blue Route on their websites and in the media, although it is notable that much of this endorsement was in advance of published details.

However, Newport City Council offers a concern about the proposal known as the Blue Route, believing it would not improve capacity and resilience.

“Whilst [the Blue Route] would appear to be beneficial in terms of its effect on the levels we believe that this option will not provide the additional capacity and resilience needed to accommodate general peak hour traffic flow between junctions 24 and 28 of the M4 Motorway.” Newport City Council

In addition, a few other stakeholders, including Magor with Undy Community Council and Gwent Wildlife Trust make similar suggestions, also mentioning the A4810 (Steelworks Access Road) and the A48 (Southern Distributor Road).

“Similarly, early signs suggests [sic] that the benefits of the Steelworks Access Road - are being enjoyed by a growing number of people with lower journey times for some journeys, which when made on the M4 would have been horrendously long.” Monmouthshire County Council

¹⁸ M4 Corridor around Newport Strategic consideration of alternatives submitted during Consultation Report (July 2014)

Several stakeholders, including environmental organisations, transport organisations and political organisations and individuals, support widening or upgrading the A48 Southern Distributor Road and cite its reduced cost as compared to building a new road. Some of these stakeholders express surprise that this option is not included in the consultation.

In contrast, Newport City Council opposes this proposal, noting that it would result in closure of a significant number of existing junctions. They also believe this suggestion would cut off communities located to the south and would not provide needed resilience during an incident on the M4.

“The upgrading of the Southern Distributor will also necessitate the closure of a significant number of existing junctions on the road which will result in severance of communities located to the south which would not be acceptable. This option is also not anticipated to provide the resilience required during any incident on the M4 and would have little benefit over the current highway network.” Newport City Council

Modifying the existing M4 and other road improvements

Several stakeholders discuss improvements to the existing M4. Suggestions include widening and upgrading the existing motorway, and improving junctions. Others recommend measures to reduce car use on the existing M4, such as by closing junctions around Newport to restrain local access and therefore improving traffic flow by decreasing local trips on the M4.

Some stakeholders, including local authorities, town and community councils, transport organisations and environmental organisations, refer to improvements on the existing roads. A few stakeholders suggest that existing roads be improved, either in conjunction with or in place of constructing a new road. Specific improvements these stakeholders mention include updating signage on existing roadways and improving safety and speed limits at Coldra.

Some stakeholders, including environmental organisations, local authorities, transport organisations and political organisations and individuals, argue that resources should be spent on sustainable options rather than on building a motorway. Some mention that the Welsh Government has pledged to put sustainable development at the core of its policies.

Traffic management

Several stakeholders, including environmental organisations, transport organisations and local authorities, discuss traffic management, maintaining that it is imperative for improving traffic flow. Friends of the Earth Cymru specifically mentions improving traffic management near the Brynglas Tunnels during peak periods as a way to reduce traffic congestion.

A few stakeholders such as Chepstow Friends of the Earth, Sustrans Cymru, Campaign Against the Levels Motorway (CALM) and Monmouthshire County Council, discuss speed limits on the M4. Some of these responses support a fixed speed limit, adding that this increases reliability of journey times, enhances safety and improves air quality, while others prefer a variable speed limit.

“A speed limit of 40mph (enforced with cameras) for several miles either side of the tunnel would actually allow for a greater volume of traffic to flow more safely.” Chepstow Friends of the Earth

Severn Bridge toll

SEWTA mentions that proposals for the M4 need to be closely coordinated with decisions regarding the tolling strategy for the Severn River Crossings, as a reduction or removal of the tolls is predicted to result in an increase in traffic using the M4.

Public transport improvements

Many stakeholders, including environmental organisations, transport organisations, local authorities, town and community councils and civil society organisations, suggest that there is a need for an array of transport options that contribute to an integrated transportation system. They frequently mention public transport and, in particular, support improvements to public transportation. Jessica Morden MP states that there is strong public demand for improved public transport. Several stakeholders cite the consultation document, noting that 40 percent of traffic on the M4 comes from trips of 20 miles or fewer and that these journeys could be made on public transport.

“Reducing congestion can only be attained by a modal shift away from cars to public transport, cycling and walking.” Newport Friends of the Earth

A small number of stakeholders, including Newport City Council, observe that the area has experienced an increase in residents who do not own a car and therefore improved public transport services are needed for social equality.

In contrast, the Confederation of British Industry questions the extent of the benefits of public transportation, stating that increasing use of public transport would not decrease traffic flow on the M4.

“Studies have shown that major investment in new or improved public transport services, whilst providing benefits in terms of general accessibility/ modal shift, would have only minimal impact with respect to reducing traffic on the M4. Generally, investment in public transport measures is more likely to be aimed at achieving wider benefits than relieving motorway traffic.” Confederation of British Industry (CBI)

The RAC Foundation expresses scepticism about the public transport complementary measures. In particular, they maintain that the solutions to congestion and capacity issues on the M4 would be short-term if only these proposals are adopted, as these proposals would not have the capacity and quality of service needed to support the long term health of the South Wales economy.

“As currently reported, the public transport plans mainly comprise strengthening of the existing network, with its strong north/south links reflecting the geography of the Welsh valleys, and a few new east/west linkages to the north and west of Newport. Whilst the proposals appear well conceived, they will mainly enhance local accessibility; have minimal effect of [sic] goods traffic and only a small impact on the longer distance personal travel in the M4 corridor. As such it is reasonable to assume that the anticipated traffic demand in the corridor will be little affected by the proposed public transport improvements.” RAC Foundation referring to the Welsh National Transport Plan

Cardiff Capital Region Metro

A number of stakeholders, including local authorities, transport organisations, private sector organisations, and political organisations, express support for a South Wales, or South East Wales Metro project (more recently referred to as the Cardiff Capital Region Metro in Welsh Government publications) and indicate that the project offers an alternative to reduce congestion on the M4 and other roadways.

A few stakeholders mention that the draft Plan does not include public transport measures because the Welsh Government has commissioned a separate study and report on proposals to develop a metro system for South Wales. Many of these stakeholders express frustration that the Cardiff Capital Region Metro is not considered in the draft Plan's proposals.

However, some of these stakeholders question whether the two proposals should be considered in tandem.

Cardiff Council sees the development of the Metro project as crucial to the future economic growth and competitiveness of the Cardiff City Region and notes that it would be potentially disastrous for the region if the scale and quality of the Metro project were reduced in order to make the M4 scheme affordable.

Rail improvements

Some stakeholders, including environmental organisations, transport organisations and political organisations, mention rail improvements, including providing new rail stations and electrification of rail lines.

“Further, we believe that you cannot consider the M4 in isolation from other transport choices. Investment in the Metro concept, plus the impact of electrification on both local and long-distance journeys, will have an impact on transport flows around Newport.” Chartered Institute of Logistics and Transport

However, the RAC Foundation observes that a disproportionate amount of investment goes to railways compared to roads, particularly given that rail accounts for a small amount of passenger and freight traffic in Britain. The CBI argues that investment in rail would have a minimal impact on reducing congestion on the M4.

Network Rail, The Welsh Liberal Democrats and Natural Resources Wales (Strategic Assessment Team) refer to freight vehicles and their impact on roadway congestion and safety. These stakeholders suggest that encouraging more rail freight could improve this.

Non-road alternatives

A few stakeholders prefer the use of non-road alternatives to solve traffic issues on the M4 and other roads.

Similarly, several stakeholders, including transport organisations and environmental organisations, mention that a reduction in car use and car-dependency is needed to reduce congestion and improve the environment and public health, yet building a new roadway would only serve to encourage more traffic.

For a full list of the alternatives submitted, please refer to the Strategic Appraisal of Alternatives Considered during draft Plan Consultation Report that accompanies this Consultation Participation Report.

6 Strategic Assessments

This section summarises responses received in relation to the strategy level assessments of the draft Plan, which were published alongside the draft Plan Consultation Document. The strategy level assessments include:

- Strategic Environmental Assessment (SEA);
- Consideration of the options in relation to the requirements of the Habitats Regulations;
- Health Impact Assessment (HIA); and
- Equality Impact Assessment (EqIA).

Consultation documents for each of the above assessments were published and subject to the draft Plan consultation. All available documents can be found at www.m4newport.com. The single consultation response form asked specific questions on each of the associated assessments, in order to understand the views of statutory consultees, the public and other stakeholders on them. The results were intended to help review and finalise the strategy level assessments.

Many comments received regarding the assessments refer to or ask for detailed information which is more relevant to scheme level appraisal. However, should a Plan be progressed, these comments will help inform the development of any of its schemes.

6.1 Strategic Environmental Assessment

Should the draft Plan be adopted, a Strategic Environmental Assessment Statement would be provided to address comments made on the SEA Environmental Report that was subject to the draft Plan consultation. This would also demonstrate how the SEA participation process has informed the Welsh Government's decision making.

Some comments have been more appropriate to a scheme level of assessment, and these will be taken into account in due course, should a Plan be adopted and schemes progressed for more detailed appraisal.

Further information on Strategic Environmental Assessment can be found in the Strategic Environmental Assessment (SEA) Environmental Report available at www.m4newport.com. Should the draft Plan be adopted, further information would be provided within the SEA Statement.

6.1.1 Representations from members of the public and other organisations

General comments about the Strategic Environmental Assessment

Respondents discuss the Strategic Environmental Assessment both positively and negatively.

About 30 respondents support the Strategic Environmental Assessment, suggesting it is clear, comprehensive or satisfactory, while approximately 30 believe it is unclear or insufficient. Respondents commenting on the document

suggest that it is too long and too complex for the general public to properly understand. Some respondents state they do not have the expertise to comment. A small number of respondents state they are not interested in the Strategic Environmental Assessment, suggesting that environmental assessments are a hindrance to essential infrastructure development.

Respondents present a range of criticisms of the Strategic Environmental Assessment. Many of these challenge the documentation without giving any further details.

Some respondents suggest the Strategic Environmental Assessment lacks detail, or that the scope of the assessment is too limited to be considered balanced. Some respondents think that the Strategic Environmental Assessment should prioritise the needs of people and communities over environmental concerns. This is in contrast to other comments which suggest the assessment focusses too heavily on human factors, places too much emphasis on economic growth, or disregards the environment.

Information, content and conclusions about the Strategic Environmental Assessment

Some respondents disagree with the content and conclusions outlined in the Strategic Environmental Assessment. Respondents challenge the methods used and the justifications and projections arrived at. A small number of respondents challenge the credibility of the document, suggesting it is unscientific, subjective or not supported by evidence. Some respondents challenge the method and scoring of the assessment believing that it displays bias. Most of these respondents express concerns that the assessment is weighted in favour of the proposed route options or is biased against the Do Minimum Scenario. In contrast, some believe the assessment scores the Black Route option too severely.

“The environmental assessment for landscape and biodiversity is given too great a negative assessment for the Black Route in particular. Both should be at least ‘Orange’ not ‘Red’.”

Some respondents would like more information on environmental impacts, such as on the Gwent Levels and biodiversity and wildlife, as well as broader issues such as increasing emissions, flood risk, and the health implications associated with these. One respondent suggests more assessment is required of the possible contamination of soils in areas that have been historically industrial.

“...very little information is given about the effects on the environment, particularly the Gwent levels.”

A small number of respondents express other concerns arguing that the Strategic Environmental Assessment is outdated, focused on too small an area or not addressing long term impacts. Requests for further information include information on details of road design, such as the layout of junctions, and further details on construction.

A number of respondents are concerned about the absence of assessment of viable alternatives, such as public transport, comparing these to the proposed route options.

One respondent wants to know more about the monitoring of environmental impacts and what would be done if adverse impacts occurred.

Criteria of the Strategic Environmental Assessment

A number of respondents express concerns about differences in criteria between the Strategic Environmental Assessment and the consultation document, suggesting that this makes comparisons between the two documents difficult. Many are concerned that certain environmental impacts, such as on the Gwent Levels, wetlands, wildlife and biodiversity and designated areas have been underestimated or understated.

“The SEA is fatally flawed because it totally underestimates the very serious and unacceptable damage that would be done to the environmental quality and integrity of the internationally-important Gwent Levels.”

One respondent suggests that some designated areas near the proposed routes have been excluded from the assessment. In contrast, one respondent suggests the possible impacts on the Gwent Levels and the SSSIs have been exaggerated and can be easily mitigated. One respondent suggests that important species that may be affected have been omitted from the assessment.

“Otters, bats, great crested newts, dormice, water voles and barn owls are all found within the study area but are not taken into account.”

One respondent suggests the Strategic Environmental Assessment fails to take into account the impact of noise from the proposed routes on wildlife in the area. Some respondents challenge the emissions and carbon cost projections, believing that these do not include those from associated with construction. A small number of respondents believe the relocation of impacts is inadequately dealt with in the Strategic Environmental Assessment, arguing that the document factors in improvements around the existing M4 but fails to factor in deterioration of the same criteria around the new development. In contrast, one respondent believes the assessment underestimates the positive visual impact of a new route, with specific mention of a new bridge over the River Usk.

Some respondents would like more information about what mitigation measures could be employed, and some express concern that environmental mitigation would not be possible or may not be effective.

“It’s impossible to mitigate disturbing wildlife. Once habitats have been destroyed it is unrealistic to expect species to obligingly remove themselves to an artificially created alternative place.”

In contrast, a number of respondents believe the environmental issues associated with the proposed development would be minimal and suggest mitigation measures would be effective in addressing any impacts.

6.1.2 Representations from Key Stakeholders

General comments about the Strategic Environmental Assessment

Stakeholders make a range of general and specific comments regarding the Strategic Environmental Assessment.

The statutory consultee for SEA, Natural Resources Wales, agree with the appraisal of biodiversity impacts to be large negative for all three road building options. They provide comments on other elements of the appraisal, which will be taken into account as part of an SEA Statement, which will demonstrate how they

have informed the Welsh Government's decision making process, should the draft Plan be adopted.

Many stakeholders, particularly environmental organisations, argue that the Strategic Environmental Assessment is insufficient, with many highlighting areas of the assessment they find contentious. Some environmental organisations and transport organisations suggest the Strategic Environmental Assessment is inaccurate, inadequate or flawed.

A pre-action protocol letter was received in December 2013 from solicitors acting for Friends of the Earth England Wales and Northern Ireland and Gwent Wildlife Trust. It sought to challenge the strategic environmental assessment and the consultation carried out in respect of it.

"[W]e do not feel that the SEA is an accurate measure of the impacts that the roads involved in the draft plan [would have] on the environment." Welsh Liberal Democrats

Some stakeholders discuss the aims, objectives and purpose of the Strategic Environmental Assessment. The Campaign for the Protection of Rural Wales argues that the Strategic Environmental Assessment is not in line with the Welsh Government's policies and commitments regarding environmental protection and sustainable development. Natural Resources Wales (Strategic Assessment Team) refers to the Welsh Government's commitment to taking into account statutory stakeholder responses, received during the scoping stage of SEA, in the preparation of the document, but notes some organisations, including the RSPB, have not been included.

Wildlife Trusts Wales and Natural Resources Wales (Strategic Assessment Team) challenge the Strategic Environmental Assessment for not including alternatives to a proposed motorway. For example, Wildlife Trusts Wales suggests the lack of alternatives in the assessment is contrary to the requirements set out in the regulations for Strategic Environmental Assessments. Some stakeholders present alternatives such as the Blue Route, Cardiff Capital Region Metro and other public transport projects¹⁹.

Information, content and conclusions of the Strategic Environmental Assessment

The RSPB and Gwent Wildlife Trust express concern about differences between the current Strategic Environmental Assessment and a previous environmental assessment in November 2012, highlighting that the scoring for some environmental impacts has been downgraded, although no evidence of new data or research to justify this is provided.

"The statement in Section 5.1 (Biodiversity, Flora & Fauna) that 'the net benefit for biodiversity (of any of the three schemes, presumably) is considered to be positive in the long-term' does not inspire confidence that this is a proper assessment of environmental effects." Campaign for the Protection of Rural Wales

¹⁹ More detail on the assessment of alternatives which were raised during this consultation can be found in the Strategic Appraisal of Alternatives Considered during draft Plan Consultation Report (July 2014). Available to download from www.m4newport.com

A number of comments are made about the assumptions and conclusions put forward by the Strategic Environmental Assessment. While Natural Resources Wales (Strategic Assessment Team) agrees with aspects of the assessment they, along with other stakeholders, challenge other aspects.

A common concern among stakeholders is that environmental impacts have been underestimated or undervalued in the Strategic Environmental Assessment. Some stakeholders offer detail and give specific examples as to why they believe the scoring is flawed. For example, while Natural Resources Wales (Strategic Assessment Team) support the Strategic Environmental Assessment's finding that the Gwent Levels Landscape of Outstanding Historic Interest in Wales would be negatively impacted by all three proposed routes, other comments suggest the impact on this area and protected or designated sites within it has been underestimated.

Some stakeholders, including statutory environmental bodies and environmental organisations, challenge the Strategic Environmental Assessment's consideration of impacts on wildlife. Some comment on the mitigation of these impacts, suggesting that mitigation may not be possible or effective.

Natural Resources Wales (Strategic Assessment Team) contributed a high proportion of the detailed comments provided about the assessment. They express concerns about noise and vibrations, suggesting the impact of these factors on biodiversity should be considered within the Strategic Environmental Assessment. They also advise that the assessment should consider a number of other criteria in greater detail, including air quality, pollutants, climate change and flood risk. They seek more details on the construction and design of the proposals. They also noted that the proposed Black Route may incorporate junctions, but that the possible impacts of these are not assessed in the Strategic Environmental Assessment. Additionally they question why the environmental effects of potential remedial work to infrastructure such as housing have not been included. As a result they stated they are unable to agree to the assessment's score for material assets.

A number of stakeholders discuss the mitigation of possible environmental impacts contained within the Strategic Environmental Assessment. Some stakeholders, including South Wales Trunk Road Agency, are broadly supportive of measures to mitigate environmental impacts, while the RSPB suggests it may not be effective or may not be possible. Natural Resources Wales (Strategic Assessment Team) suggests that due to the lack of specific detail in the proposals, it is inaccurate to state with certainty that all impacts could be mitigated.

6.2 The Habitats Regulations Assessment

A Strategic Habitats Regulations Assessment (SHRA) would be published alongside a potential Plan, to take into account comments made as part of the participation process. Some comments have been more appropriate to a scheme level of assessment, and these will be taken into account in due course, should a Plan be adopted and schemes progressed for more detailed appraisal.

A Habitats Regulations Assessment is only relevant for European Sites including Special Areas of Conservation (SACs), Marine SACs and Special Protection Areas (SPAs). However it is government policy in England and Wales to also include Wetlands of International Importance (Ramsar sites), potential SPAs

(pSPA), candidate SACs (cSAC), and possible Ramsar sites as European Sites. Comments provided in this section sometimes refer to sites not subject to Habitats Regulation Assessment, but are noted for completeness.

Further information on the Habitats Regulations Assessment can be found in the strategic Habitats Regulations reports, available at www.m4newport.com.

6.2.1 Representations from members of the public and other organisations

General comments about the Habitats Regulations Assessment

A range of positive and negative comments are given by respondents regarding the Habitats Regulations Assessment. Overall, respondents are critical rather than supportive of the assessment. The assessment is criticised on a number of grounds, including lack of clarity, complexity and length. Respondents often express concerns about the document being too long and difficult to understand with some suggesting that a non-technical summary would be appropriate. Some respondents offer general support for the assessment, stating it is thorough and appropriate.

“It was clearly presented and the highlighted significance made it easy to understand.”

Some respondents criticise the Habitats Regulations Assessment’s emphasis on protecting habitats, with a few suggesting some negative impacts on the environment are acceptable in the pursuit of economic growth and job creation. The lack of alternatives included in the Habitats Regulations Assessment is a concern for some respondents.

“As with the SEA the scope of the HRA is too limited to present a balanced assessment of the wider alternatives. The HRA should be re-commissioned to allow it to present a robust assessment of all the viable and reasonable alternatives in addition to those included in the consultation.”

One respondent suggests that the assessment content differs from the consultation document, in particular, that the Habitats Regulations Assessment lacks consideration of the possible impact of future developments on the SACs and SPAs in the area.

Information, content and conclusions regarding the Habitats Regulations Assessment

While some respondents say the information within the Habitats Regulations Assessment is adequate, many challenge the content and methodology. Some suggest the data is insufficient or out of date, and some suggest that the assessment should be re-commissioned. Respondents express particular concern about bias in the assessment and challenge the assessment and scoring of the proposals. Some suggest specific instances where they believe the assessment is incorrect. A number of respondents criticise the Habitats Regulations Assessment for its use of “professional judgement” without further specification as to what this is, suggesting this renders the assessment flawed.

“Professional judgement is not evidence and, when the precautionary principle is taken into account, would not be adequate to satisfy Article 6(3) of the Habitats Directive.”

A number of projections and assumptions within the Habitats Regulations Assessment are contested by respondents, such as the claim that congestion hinders economic development in South Wales. Some respondents also challenge the assessment's assumptions of the impacts on bird populations on the Gwent Levels. Respondents are concerned that these conclusions are not supported by evidence. A number of respondents specify that because of this, they fundamentally disagree with the conclusions of the Habitats Regulations Assessment.

Criteria and the Habitats Regulations Assessment

Many respondents are concerned that the Habitats Regulations Assessment underestimates the value of certain aspects of the environment.

“There is minimal discussion of the Gwent Levels Site of Special Scientific Interest whose biodiversity will be most directly affected by the proposals.”

Some respondents suggest the Habitats Regulations Assessment places too little value on protected or designated areas such as SSSIs and Ramsar sites, their wildlife and their value as areas of recreation. One respondent suggests that the assessment should be revised following consultation with the appropriate Ramsar Convention Authorities. A few respondents suggest that negative impacts on protected or designated sites must be properly mitigated, particularly wetlands.

Respondents think the assessment should provide further information about particular habitat impacts. Some comments emphasise a need to maintain access and to minimise disruption and noise pollution. A number of respondents raise concerns about the level of detail provided about impacts on wildlife and request further information. Some respondents suggest that the Habitats Regulations Assessment omits some species.

“Whatever is built, some habitats will be affected. However, road verges can become habitats – perhaps wider-than-usual verges are the answer. Prepare new habitats in advance of the road-building.”

Respondents suggest natural habitats need to be protected and highlight the need to minimise any impacts on biodiversity and wildlife. A number of respondents comment on the mitigation proposed within the Habitats Regulations Assessment. Of these comments, most support the mitigation measures, believing they can be implemented and would be appropriate. In contrast, a number of respondents say that the proposed mitigation measures are insufficient and would not be effective. In particular, some respondents worry that it would not be possible to mitigate the severance of habitats by a new road.

“This is inadequate, and no matter what is done to mitigate it, all three proposals dissect and destroy habitats.”

Some respondents seek more detailed information about mitigation measures while others offer suggestions for mitigation such as enhancement of Sites of Special Scientific Interest and SAC's in the area.

6.2.2 Representations from Key Stakeholders

General comments on the Habitats Regulations Assessment

Some stakeholders, including Public Health Wales and statutory consultee Natural Resources Wales (Strategic Assessment Team), support some aspects of the Habitats Regulations Assessment. Some others challenge or criticise this assessment. A number of stakeholders make detailed comments on the Habitats Regulations Assessment and advise on what they believe needs to be included in the assessment.

“Not adequate to establish the real impact of the proposal.” Goldcliff Community Council

As with the Strategic Environmental Assessment, Natural Resources Wales (Strategic Assessment Team) contributes a high proportion of the detailed comments provided about the assessment. They suggest that the Welsh Government consults Natural England. They also seek further involvement in the consultation, stating they are the appropriate nature conservation body for the area.

Information, contents and conclusions of the Habitats Regulations Assessment

Many stakeholders challenge the Habitats Regulations Assessment in some way, often regarding the scoring of particular criteria. Most stakeholders raise concerns about the lack of detail or value placed on environmental criteria. In contrast, Newport Liberal Democrats suggests some negative environmental impacts are acceptable and inevitable.

“We have to be realistic in accepting that there are already 2 million people and associated settlements. We must strike a balance between economic and environmental considerations.” Newport Liberal Democrats

Stakeholders suggest specific areas they believe need to be included in the Habitats Regulations Assessment or considered in greater detail. Natural Resources Wales (Strategic Assessment Team) highlights several, including the impact on designated sites such as the River Usk SAC, Newport Wetlands National Nature Reserve and the Severn Estuary Ramsar site. A number of other stakeholders also highlight the importance of these designated sites and the legal requirement to assess any potential impacts. Natural Resources Wales (Strategic Assessment Team) suggests that it would be incorrect to determine that there would not be adverse impacts on a number of species prior to the proposals being finalised.

Similarly, some other stakeholders raise concerns about the assessment of biodiversity and wildlife within the Habitats Regulations Assessment. These stakeholders, including Newport City Council and Natural Resources Wales (Strategic Assessment Team), highlight the need for greater assessment of protected and designated areas and several species as well as pointing out some species that have been omitted, such as the European Eel and a number of bird species. Some stakeholders also express concerns that the cumulative impacts of the proposals have not been adequately addressed in the Habitats Regulations Assessment.

Natural Resources Wales (Strategic Assessment Team) also highlights the Welsh Government's intention to investigate a junction strategy if and when the Black Route is adopted. Some other stakeholders express concern that the implications of this junction strategy are not investigated in the Habitats Regulation Assessment, and that this compromises the ability of the Habitats Regulation Assessment to achieve its purpose.

A number of stakeholders, including transport organisations, political organisations and statutory environmental bodies, explore the mitigation of impacts raised by the Habitats Regulations Assessment. Most stakeholders accept the need for appropriate mitigation with some suggesting the Welsh Government should work with the relevant agencies or organisations to reduce impacts on habitats. Others suggest mitigation measures for specific species or issues such as carefully managing construction work and retaining breeding habitat.

"We agree that it could be possible to avoid adverse effects on the otter feature of the River Usk SAC through ways of working during the construction phase and the retention of suitable breeding/resting habitat where appropriate." Natural Resources Wales (Strategic Assessment Team)

6.3 The Health Impact Assessment

A strategic Health Impact Assessment of the Plan would be published alongside a potential Plan, to take into account comments made as part of the participation process. Some comments have been more appropriate to a scheme level of Health Impact Assessment, and these will be taken into account in due course, should a Plan be adopted and schemes progressed for more detailed appraisal.

Further information on the Health Impact Assessment can be found in the draft Plan Health Impact Assessment (HIA) Report, available at www.m4newport.com.

6.3.1 Representations from members of the public and other organisations

About 15 respondents state that they support or are satisfied with the Health Impact Assessment, with most of these noting that the assessment, including the list of stakeholders, is comprehensive. A few suggest that the assessment is so comprehensive that it could be challenging for readers to determine the main points. Several respondents suggest that they do not have the expertise to comment on the assessment.

"There's a lot of good detail in here but you have to dig deep to get to it! – I would have preferred to see a short document summarising the key points with all the background and technical details shoved into annexes."

About five respondents suggest the assessment is unconvincing, biased or irrelevant to the project. One respondent observes that some negative aspects mentioned in the Health Impact Assessment do not appear in the consultation document.

Some respondents challenge the assumptions and justifications used in the assessment. For example, a few respondents observe that the assessment focuses solely on physical health and not the broader issue of well-being. Some

respondents argue that the scope of the assessment is too narrow, as it confines health benefits to those related to journey times or because it does not consider secondary health impacts resulting from potential impacts on wetlands and other habitats and the curtailment of recreation use this could entail. A few respondents dispute the assessment's figures or projections, mainly those regarding air quality and emissions. These concerns lead some respondents to state they oppose the assessment. One respondent expresses confusion as to whether the assessment is complete.

A small number of respondents remark that the health impacts of reduced car use or an increase in other modes of transportation – such as cycling – are not sufficiently discussed. A few respondents suggest the assessment does not pay regard to mental health, while a few others believe that the health impacts from a reduced quality of life that could result from the project are not mentioned.

“As with the SEA the scope of the HIA is too limited to present a balanced assessment of the wider alternatives.”

Some respondents argue that the assessment is not complete without additional information, such as about noise – and mitigation of noise – during construction and operational phases of the project, and about air quality. A few respondents suggest specific details they would like the assessment to include, such as a list of the communities and vulnerable groups that would experience negative health impacts, and the inclusion of all viable alternatives.

A few respondents argue that the assessment should be re-run. One respondent asks whether other Welsh Government schemes have Health Impact Assessments.

A small number of respondents discuss the potential forms of mitigation available and the impact that they may or may not have. One respondent asserts that mitigation measures are needed because of the potential impact the project would have on air quality. Another respondent doubts that mitigation efforts to provide cycling and walking routes would have an impact on health, claiming few people would have an incentive to use them.

6.3.2 Representations from Key Stakeholders

General comments on the Health Impact Assessment

A small number of stakeholders give comments on the Health Impact Assessment. Most do not offer an overall indication of support or opposition, commenting on aspects of it instead.

Some stakeholders are concerned about a lack of detail within the Health Impacts Assessment and suggest more information and data should be included.

“This is a qualitative assessment but the quantitative environmental health data should also be included, along with cross reference to the data and evidence contained in the other assessment reports.” Public Health Wales

Several stakeholders seek clarification on particular issues. For example, Public Health Wales ask for further information on which communities would be affected by severance and degradation in air quality. As well as suggesting the assessment should include more detail about environmental health data, crash risk

and severity, Public Health Wales also seeks more defined timescales and direct engagement with affected residents.

Public Health Wales and NHS Wales Health Impact Assessment Support Unit say they welcome that the assessment would be updated with comments from the stakeholder workshop and the consultation. These stakeholders also believe the assessment is currently very general, recommending a further Health Impacts Assessment is carried out at scheme level under the WelTAG requirements.

A number of stakeholders express concerns that alternatives to a new road have not been taken into account in the assessment. These stakeholders suggest benefits to health can be better accessed through alternatives such as increased use of public transport.

A few stakeholders comment on the complementary measure of providing more walking and cycling infrastructure in relation to the Health Impact Assessment. The public health benefits of walking and cycling are highlighted by some stakeholders, with the Campaign for Better Transport suggesting more detail of these complementary measures is needed in the Health Impact Assessment.

“Without further understanding of the permeability of both the proposed new road and the downgraded existing M4, it is difficult to make an assessment of the consequential improvements to public health from increased walking and cycling.” Sustrans Cymru

Information, content and conclusions of the Health Impacts Assessment

Some stakeholders, including transport organisations, public sector and community organisations and town and community councils, raise concerns about aspects of the Health Impacts Assessment, often disagreeing with its conclusions due to the scoring of certain criteria. Stakeholders express particular concern about the assessment's claim that air quality would improve and the health benefits resulting from this. Several stakeholders, including Sustrans Cymru, suggest the assessment fails to consider the increase in car use stimulated by a new road and the subsequent increase in pollutants, which they believe would reduce or eliminate any improvements to air quality.

Sustrans Cymru expresses concern that even though the Health Impact Assessment acknowledges there would be changes in levels of air quality and noise pollution, the health benefits are scored positively. Newport City Council expresses concerns that there is a lack of detail regarding possible junctions along the route, suggesting the location of junctions can play a crucial role in local air quality. They suggest further assessment is required in regards to this issue and if needed, mitigation measures should be included.

Newport City Council expresses concern over the possible impacts construction could have on local air quality.

Newport City Council also makes comments on contaminated land within the construction area. They highlight the danger of re-using material recovered from contaminated sites and suggest a thorough human health and environmental risk assessment of this material before its re-use.

6.4 The Equality Impact Assessment

A strategic Equality Impact Assessment of the Plan would be published alongside a potential Plan, to take into account comments made as part of the participation process. Some comments have been more appropriate to a scheme level of assessment, and these will be taken into account in due course, should a Plan be adopted and schemes progressed for more detailed appraisal.

Further information on the Equality Impact Assessment can be found in the draft Plan Equality Impact Assessment (EqIA) Report, available at www.m4newport.com.

6.4.1 Representations from members of the public and other organisations

About ten respondents find the assessment satisfactory, remarking that it is thorough, covers all impacts and its conclusions are accurate.

Several respondents highlight the equality impact assessment's finding that the Black Route option would have a positive impact, while taking no action would have a negative impact on equality. A few respondents state that they do not agree with the Equality Impact Assessment's conclusions. A few others state that they do not think the assessment demonstrates the need for a new road.

Several respondents say that they found the assessment document too long and that it was hard to find the information they were looking for within it. One respondent wishes for a shorter non-technical summary version to be made available. In contrast, a few respondents found the document too brief and too vague.

Where respondents are critical of the assessment they often challenge the assessment's objectivity, suggesting that it is a subjective interpretation of the potential impacts, presented as fact and, accordingly, such processes could be manipulated to help secure a preferred outcome. Similarly, respondents argue that the assessment is prejudiced in favour of car transport, claiming that it works from the assumptions that not building a new road would have a negative impact and that car use would increase.

Another criticism from respondents is that the assessment only considers the options proposed in the consultation document. Some respondents think this is too limited a scope, saying they would like to see a broader range of alternatives considered.

"As with the SEA the scope of the Equality IA is too limited to present a balanced assessment of the wider alternatives."

A small number of respondents state that the assessment should be redone in order to include these additional alternatives.

Many respondents state that they do not believe equality considerations are relevant to a project such as this and that the assessment is a bureaucratic exercise driven by what they regard as political correctness.

A few respondents discuss the different social groups identified within the assessment. One respondent is concerned about social exclusion and suggests that

it would have been useful to characterise specific groups by the types of transport they typically use. Others state that the assessment should have considered those people who are unable to drive, for example, due to medical conditions. One respondent suggests that the impacts on non-human life should also be included in the assessment.

6.4.2 Representations from Key Stakeholders

General comments on the Equality Impact Assessment

A number of stakeholders comment on the Equality Impact Assessment, in varying levels of detail. Most of these comments, including comments from transport organisations, environmental organisations, private sector, business and regeneration organisations and town and community councils, are critical of the assessment, with some suggesting it is weak, incorrect or inadequate.

Some stakeholders criticise the Equality Impact Assessment for not including alternatives to a new road in its assessment. They highlight the importance of alternatives such as public transport improvements and the Cardiff Capital Region Metro and suggest the lack of alternatives is a limitation of the assessment²⁰.

“The fact that the potential impact of the Metro is excluded from the social inclusion, equality, diversity and human rights consultation assessments severely weakens their validity.” Federation of Small Businesses Wales

Information, content and conclusions of the Equality Impact Assessment

Several stakeholders are critical of the scoring, justifications and evidence used in the Equality Impact Assessment. Sustrans Cymru disputes the impact of possible improved journey times while CTC Cymru suggests the assessment makes unsubstantiated claims about possible economic opportunities.

Many stakeholders express concerns regarding the impacts road development could have on equality within the local community, suggesting individuals without access to a car would not benefit from the proposals.

“Most people in the lowest income quintile do not own cars/vans. It is therefore difficult to reconcile the assertion that the needs of poorer people will be met.” Friends of the Earth Cymru

CTC Cymru makes a number of detailed comments regarding the Equality Impact Assessment, criticising several statements. They argue that the Assessment is incorrect in suggesting that lack of access to a car is the main factor in the social exclusion of low income households, giving examples of European cities which have low car usage.

Some stakeholders, including CTC Cymru, Age Cymru and Friends of the Earth Cymru, raise concerns about the changes in car usage the proposals may have, with several stakeholders suggesting it would make Newport and its residents more dependent on cars. Some express concern that this would be detrimental to equality within the local community, as they believe a more car orientated city

²⁰ More detail on the assessment of alternatives which were raised during this consultation can be found in the Strategic Appraisal of Alternatives Considered during draft Plan Consultation Report (Jul 2014). Available to download from www.m4newport.com

would result in the social exclusion of those without cars. Some stakeholders also believe the assessment of traffic levels in the Equality Impact Assessment is insufficient. Age Cymru suggests the assessment does not fully consider the possible impact on traffic levels in Newport city centre as well as the safety of pedestrians.

Age Cymru makes reference to mitigating possible impacts on equality. They suggest that, if replacement community facilities are constructed as part of a compensation package, they should be located in the same area as previous facilities to ensure they are fully accessible by local people.

7 Evaluation

7.1 Engagement Activities Feedback Form results

An Engagement Activities Feedback Form was distributed at all public exhibitions and workshops as well as being available on the consultation website. This questionnaire asked for feedback on the publicity, documentation and events used throughout the consultation. 96 feedback forms were received, the results of which are provided in Appendix A16.

The majority of respondents agree that the draft Plan Consultation Document provided enough information on the draft Plan, the Reasonable Alternatives and the Do Minimum Scenario, and that it was easy to understand.

94% of these respondents attended a public exhibition, and 80% of these agreed that this helped them to understand the consultation information.

7.2 Other feedback

Some respondents and key stakeholders provided comments on the consultation process undertaken by the Welsh Government within their consultation response form. These comments are summarised in this section.

Many respondents and key stakeholders criticise the consultation process, although there is some support. Of the key stakeholders who commented, some ten offer explicit support for the consultation process but approximately 25 stakeholders criticise it generally.

In addition to stakeholder comments, the public and other organisations also provided their views on the consultation process. Approximately ten respondents offer explicit support for the consultation process that has been undertaken, whilst approximately 120 comments express general opposition to the process.

Specific aspects of the consultation that stakeholders and/or other respondents criticise are in relation to:

- Scope and content;
- Questions;
- Available information and documentation; and
- Events.

The feedback received is detailed in the Full Factual Report, found at Appendix A1. All comments have been reviewed and, where relevant, taken into account when preparing the Plan, the Strategic Appraisal of Alternatives Considered during draft Plan Consultation Report, and updating the Strategic Assessments. In addition, the comments will also feed into future engagement activities that might take place, should the Plan be adopted. For example, if any schemes are progressed from a Plan, then consultation would be undertaken on an Environmental Impact Assessment (EIA).

As with the feedback received during the M4 CEM consultation, this feedback will also play a key role in the design of any future consultation.

8 Next steps

The consultation responses reported within this M4 Corridor around Newport Consultation Participation Report, in addition to the wider engagement and consultation that helped shape the development of the M4 Corridor around Newport draft Plan, will help inform the Welsh Government's decision making for the M4 Corridor around Newport.

This Consultation Participation Report and all responses received during the consultation period have also helped the Welsh Government to review, update and/or prepare the associated assessments documents as outlined below:

- The comments received on the SEA Environmental Report inform the preparation of an SEA Statement, and should a Plan be adopted, would be published in accordance with the SEA Regulations. The purpose of the SEA Statement is to outline how the environmental assessment and consultation have influenced the decision making process;
- A Strategic HRA would be published to take into account the comments from Natural Resources Wales, and others, in accordance with the HRA Regulations;
- A Strategic HIA will be published to take into account the comments received from the HIA Workshop and the Welsh Health Impact Assessment Support Unit (WHIASU) as well as others; and
- A Strategic EqIA will be published to take into account the comments received during the EqIA workshop and telephone interviews, in addition to taking into account comments received from Welsh Government's Fairer Futures department and Department of Economy, Transport and Science's Equality Support Unit, and others. It will also take into consideration the equality data collected as part of the single Response Form to the draft Plan consultation.

The Welsh Government will use the responses to the draft Plan Consultation to help it decide whether to adopt the draft Plan, with or without amendments taking into account responses to the associated assessments.

Should it adopt a Plan for the M4 Corridor around Newport, the Welsh Government then may decide to announce a Preferred Route, which would protect the corridor for planning purposes. The Welsh Government would then engage with local people and other interested parties on specific and detailed elements of any of the options that may be progressed. These options will require further work as they are developed for delivery.

Should it adopt a Plan, the Welsh Government will develop schemes in detail to deliver the Plan, building on its strategy level assessments and associated development work. Scheme development will require Environmental Impact Assessment and a decision as to whether to proceed with construction is likely to be informed by a public local inquiry.

The potential key dates for progressing an M4 Corridor around Newport Plan, if published, are:

1. Publication of draft Orders and Environmental Statement: Spring 2016;
2. Public Local Inquiry: Winter 2016/2017;
3. Start of Construction: Spring 2018;
4. Completion of Motorway Construction: Autumn 2021; and
5. Completion of work associated with reclassification of existing motorway: Spring 2022.

The Welsh Government thanks those who have participated to the M4 Corridor around Newport engagement and consultation process so far.

9 List of participants

All participants are listed below, except where no name was provided as part of a response.

9.1 Organisations

Organisation
ACPO Cymru
Act Travelwise.
Age Cymru
Amphibian and Reptile Conservation (ARC) Trust
Associated British Ports South Wales
Automobile Association
Buglife - The Invertebrate Conservation Trust
Cadw
Campaign Against the Levels Motorway (CALM)
Campaign for Better Transport
Campaign for the Protection of Rural Wales
Cardiff Council
CBI
Chartered Institute of Logistics and Transport
Chepstow Friends of the Earth
Church Action for Sustaining the Environment
Chwarae Teg
CTC Cymru - the national cycling charity
Federation of Small Businesses Wales
Freight Transport Association
Friends of the Earth Cymru
GMB
Goldcliff Community Council
Gwent Wildlife Trust (organisation response)
Health and Safety Executive
Magor with Undy Community Council
Marshfield Community Council
Monmouthshire County Council
Monmouthshire Local Access Forum
Nash Community Council
National Grid
Natural England
Natural Resources Wales (South Operations Directorate)
Natural Resources Wales (Strategic Assessment Team)
Network Rail

Organisation
Network Rail Infrastructure Limited
Newport City Council
Newport Civic Society
Newport Friends of the Earth
Newport Harbour Commissioners
Newport Liberal Democrats
Newport Local Access Forum
NHS Wales Health Impact Assessment Support Unit
Orb Electrical Steels
Plaid Cymru Group on Torfaen Council
Public Health Wales
RAC Foundation
Ramblers Cymru
Response by lawyer (GVA) on behalf of Tata Steel UK Ltd
Road Haulage Association
RSPB
RSPB North Wales Local Group
SEWTA
South East Wales Regional Equality Council
South Wales Branch - Chartered Institution of Highways and Transportation
South Wales Fire & Rescue Service
South Wales Mammal group
South Wales Trunk Road Agent
St Modwen Properties PLC
Sustrans Cymru
SWITCH
The Coal Authority
The Institution of Civil Engineers Wales Cymru
The Newport Harbour Commissioners
The Woodland Trust
Torfaen County Borough Council
Torfaen Friends of the Earth
University of South Wales
Valleys Bat Group
W E Dowds (Shipping) Ltd
Wales Green Party
Welsh Liberal Democrats
Wildlife & Countryside Services
Wildlife Trust Wales
Ymddiriedolaeth Genedlaethol / National Trust

9.2 MP, AMs and Councillors

MP, AM and Councillor	Region, Constituency, Ward
Lindsay Whittle AM	South Wales East Region
Bethan Jenkins AM	South Wales West Region
Jessica Morden MP	Newport East
Cllr Jessica Crook	Elm Ward- Magor with Undy Community Council
Cllr Frances Taylor	Mill Ward- Magor with Undy Community Council
Cllr Margaret Cornelius	Graig Ward
Cllr Martyn Kellaway	Llanwern Ward
Cllr Tom Bond	Rogerstone Ward

9.3 Public

Title	First Name	Surname
	Rhys	Ab Elis
	Ian	Abbott
Mr	Ross	Adams
Mrs	Sylvia	Adcock
Dr	John	Aggleton
	John	Aggleton
	Liz	Aiken
	M	Alcock
Mr	Philip	Alder
Mr	Gordon	Alderdice
Mrs	Alison	Alexander
Mr	Razwan	Ali
Mr	David	Allan
	Keith	Allen
Prof	Paul	Allin
	N	Alun
Dr	James	Anderson
	Neil	Anderson
	Philip	Anderson
	T N D	Anderson
Mr	Christopher	Andrews
	Dick	Andrews
Mr	Mark	Andrews
Mr	Marcus	Annandale
Dr	Martin	Anthoney
Mr	Malcolm	Appleton

Title	First Name	Surname
	David	Ardron
	Carolyn	Arnold
	Leigh	Arthur
	Carolyn	Arthurs
	Donald	Arthurs
Miss	Dawn	Ashford
Mr	John	Atkins
	Janet	Atkinson
	Ronald	Atwell
Mr	Jon	Aylwin
	G.M.	Ayres
	Catherine	Baart
Mr	Frederick	Bagley
Mr	David	Bailey
	Peter	Bailey
Mr	Roger	Bailey
Dr	David	Bainton
Mr	Andrew	Baker
	David	Baker
Mrs	Emma	Baker
Mr	Richard	Bakere
Mr	Mark	Balch
Mr	Tristan	Ballard
	Ian	Banner
	David	Barber
Mrs	Kathy	Barclay
	Monica	Barlow
Mr	Michael	Barrell
	Rhian	Barrell
	Andy	Barrett
Mr	Christopher	Barron
Mr	Andrew	Bartlett
	Roger	Bartlett
Mr	Gavin	Batten
Mrs	Susan	Baugh
	Julia	Bawn
Mr	Keith	Baxter
Miss	Fran	Bayley
Mr	Gareth	Beak
Mr	Nick	Bebb
Mr	Martin	Bebell

Title	First Name	Surname
Mrs	Dilys	Beckett
	Neil	Beckhelling
	Jonathan	Beels
	Kate	Bellew
	Doug	Bennett
Mr	Peter	Bennett
Mr	Phil	Bennett
Miss	Rachel	Bennett
Miss	Zoeie	Bennett
Mr	Phillip	Bennington
Mrs	Jacqueline	Berrington
Mr	Ieuan	Berry
Mr	Stephen	Berry
	Nicholas	Beswick
	Andrew	Bevan
Mr	Trystan	Bevan
Mrs	Paddy	Beynon
	Arnold	Bibbings
FL	D	Biddles
Mr	Allan	Birch
	Eleanor	Bird
	Glen	Biseker
Mr	L.G.	Bishop
Mr	S	Bishop
	Sean	Bishop
Mr	Allan	Blackmore
Mr	Edwin	Blackmore
Mrs	Louise	Blackmore
Dr	Tom	Blaen
Mr	Kevin	Blakemore
	Paul	Blick
	Chris	Bolton
Cllr	Tom	Bond
Mr	David	Booker
	Andrew	Borland
Mr	Gwynne	Bosley
	Michael	Bosley
Mr	Simon	Bottomley
Mrs	Pavla	Boulton
Mr	Johnathan	Bowden
Mrs	Gillian	Bowen

Title	First Name	Surname
Miss	Lianne	Bowen
	Lianne	Bowen
Mr	Stephen	Bowen
	Robin	Bowles
Mr	Alan	Bowley
	Naomi	Bowyer
Mrs	C.S.	Boyce
	George	Boyce
	Douglas	Boyes
Mr	Mike	Boyland
Mr	Cliff	Bradshaw
	Godfrey	Bradshaw
Mrs	Linda	Bradshaw-Wood
	Helen	Bralesford
Mr	David	Brannigan
	Patrick	Brannigan
	Tanya	Brannigan
Ms	Indigo	Branscombe
Mr	Julian	Branscombe
Miss	Tansy	Branscombe
Mr	Jonathan	Bray
	Sarah	Breeze-Roberts
	Kevin	Brew
	Tom	Brewis
Mr	Roger	Bridgwater
Mr	Allan	Brinkley
Mr	John	Britton
Miss	Emma	Broad
Mr	Andrew	Broadwell
Mr	Simon	Brook
Mr	Michael	Brooke
	David	Brooks
Mr	Ian	Brooks
	J	Brown
	Rebecca	Brown
	Terry	Brown
	Neville	Bruce
Dr	Richard	Bryant
	Dave	Bubier
	David G	Buckley
Mrs	Helen	Bucknall

Title	First Name	Surname
	Brian	Bull
	Leighton	Bull
Revd	Adrian	Bulley
	Anthony	Bullock
	Greg	Bullock
Mrs	Chrysi	Burgham-Malin
Dr	Richard	Burkmar
Mr	Steve	Burnhill
	Rob	Burstow
Mr	Steve	Burt
Mrs	Siobhan	Burton
	Simon	Butler
Mr	Tomos	Buttress
Mr	James	Byrne
	Gordon	Cadden
Mrs	Diana	Callaghan
Mr	Jeremy	Callard
	David	Calver
Mr	David Stuart	Calver
Mrs	Elizabeth	Cameron-Wilton
Mr	Colin	Camies
Mrs	Jean	Campbell
Mrs	Susan	Campbell
	L.J.	Cantnell
	William	Capper
	Mildred	Carey
Mr	Christopher	Carini
Mr	Derek	Carpenter
Mr	Neil	Carpenter
Mr	Chris	Carrel
Mr	Ron	Carrie
Miss	Elizabeth	Carter
	Ian	Cassidy
Mr	Ian	Cater
	Ivor	Cavill
	Amy	Challis
Mr	Kit	Chan
Mrs	Gill	Chapman
Mr	Kevin	Chapman
	Kirstin	Chapman
	Gaynor Elizabeth	Chapple

Title	First Name	Surname
Mr	Christopher	Charles
	Michael	Charles
Mr	Paul	Chase
Mr	Colin	Cheesman
	Donna	Chinnick
	Thomas	Chinnick
Mr	Graham	Chivers
	Rich	Chnadler
Mr	Stephen	Cieslik
Mr	A. P.	Clark
Mr	John	Clark
Mr	John	Clark
	Roderick	Clark
Prof	Timothy	Clark
	Tony	Clark
	John And Mary	Clark & Ward-Jackson
Mrs	Liz	Clarke
	Nicholas	Clarke
Mr	Stuart	Clarke
Mr	Tom	Clarke
	Malcolm	Clayton
Mrs	Sarah J	Clayton
Mr	Steve	Clifton
	David	Clubb
Mr	Timothy	Coe
	Chris	Coldrey
	Dick	Cole
	Ismene	Cole
Mr	John	Coleman
Miss	Katie	Coleman
	Richard P.H.	Coleman
Mr	John	Colleypriest
	Stuart	Collings
	Nigel	Collins
Mr	Andrew	Collinson
	Jenny	Comont
	E.A.	Cook
Mr	James	Cook
Mr	Ralph	Cook
	John & Gillian	Cooke
Mr	Barrie	Cooper

Title	First Name	Surname
Dr	Kenneth	Cooper
	Mark	Cooper
	Frank	Coote
Dr	Stephen	Coppell
Miss	Jane	Corey
Cllr	Margaret	Cornelious
	Jeremy	Corson
Mr	Richard	Coser
	David	Coton
Ms	Wendy	Cottis
	David	Cousins
	Mary	Cousins
Miss	Gabrielle	Cowcill
Mr	Mark	Cowley
Mr	Chris	Cox
Mr	Linden	Cox
Mr	Owen	Cox
Mrs	Angela	Craig
Mr	Christopher	Crane
Dr	Frederick	Cranfield
Mr	Paul	Crawshaw
Mr	David	Crean
	Dave	Crewe
	Alan	Cripps
	Martin	Croft
Mr	Richard	Crompton
	Len	Cronin
Cllr	Jessica	Crook
Mrs	Laura	Cropper
	John Barrie	Crosbie
	Michelle	Cross
Mrs	Ceri	Crossland
Mr	Anthony	Crothers
Mr	Jonathan	Cryer
Mr	Brian	Cudlip
	Cheryl	Cummings
Mr	Ian	Cumper
Mr	Gareth	Cunningham
Ms	Jan	Cunningham
Mr	Don	Curnuck
	Joan	Curnuck

Title	First Name	Surname
Mr	Christopher	Curtis
Mr	Stephen	Curtis
	Jeremy	Cutter
	Sion	Dafis
	Sarah	Dale
Mr	William	Dallimore
Mr	Stuart	Daltrey
Mr	Robert	Dando
Mr	Leigh	Daniels
Dr	Rachael	Daniels
Mrs	Susan	Danziger
Mrs	Elaine	Davey
Mr	John	David
	Henry	Davidson
	Robert	Davidson
	Caroline	Davies
	Catherine	Davies
Mr	Colin	Davies
Mr	Colin	Davies
	David	Davies
Mr	Gareth	Davies
Mr	Graham	Davies
Mr	Huw	Davies
Mr	Ian	Davies
Mr	Jeremy	Davies
Mr	John	Davies
Mr	John	Davies
	John	Davies
	John A.	Davies
	Llyr	Davies
	Margaret	Davies
Dr	Matthew	Davies
	Nicola	Davies
Mr	Richard	Davies
Mr	Ronald	Davies
Mrs	Rosemary	Davies
Mr	Ryan	Davies
Mrs	Sarah	Davies
Miss	Shirley	Davies
Dr	Stephen	Davies
Mrs	Sylvia	Davies

Title	First Name	Surname
Mr	Terry	Davies
Dr	William	Davies
Mrs	Carol	Davis
Miss	Susan	Davis
	Stephen	Davison
Mr	Phillip	Davy
Mrs	Alex	Dawson
	C. Graham	Dawson
Ms	Suze	De Lee
Mrs	Nicola	De Val
Dr	Stacey	Deamicis
Dr	Toity	Deave
Miss	Laura	Dell
	Michael	Denman
Mr	Rick	Dennis
	R W	Dennison
Ms	Aline	Denton
	Margery	Devlin
Ms	Lisa	Dew
Mrs	Janet	Diamond
	Laura	Dicken
Mr	Jack	Dickson
	Alan	Doble
Mr	Andrew	Doe
Mr	Lawrence	Doncaster
Mr	Keith	Douglas
Mr	Sam	Douthwaite
Mr	Stephen	Dover
Mrs	Ruth	Dow
	Kevin	Dowler
Mr	Allan	Dowson
Ms	Susan	Dray
Mr	Richard	Drew
Miss	Julia	Dudley
Dr	Kate	Dufton
Mr	James	Duke
Mr	Jon	Dunkelman
Mrs	Marilyn	Dunkelman
Mr	Timothy	Dykes
Mr	Tom	Dynes
Miss	Susan	Earnshaw

Title	First Name	Surname
	Anthony	Easson
Dr	Jeff	Edwards
	Jenny	Edwards
Mrs	Lynne	Edwards
	Malcolm	Edwards
Mr	Mark	Edwards
	Miranda	Edwards
	Stan	Edwards
Mr	Steven	Edwards
Mrs	Ynys Ann	Edwards
Mr	David	Eggleton
Mr	Peter	Elkington
Mr	Richard	Ellis
	Geoffrey	Elms
Mr	Gary	Elson
	Shane	Emanuel
Mr	William	Embrey
	Edward	
	Maxine	Esser
	Alan	Evans
	Christine	Evans
	Colin	Evans
Mr	David	Evans
Mr	David G	Evans
Mr	Geoffrey	Evans
	Gillian	Evans
Dr	Huw	Evans
Miss	Joanne	Evans
Mr	John	Evans
	Paul	Evans
Mrs	Rebecca	Evans
Mr	Richard	Evans
Dr	Roger	Evans
Mrs	Susan	Evans
Mr	Tom	Eyles
	Sadie	Ezard
Dr	Nigel	Faithfull
Mr	Jonathan	Fant
	Louise	Farrant
Mrs	Judy	Fear
	William	Felton

Title	First Name	Surname
Mr	John	Fender
Miss	Imogen	Fernando
Dr	Christopher	Field
	Roy	Filkins
Mr	Richard	Finch
Mr	Roger	Finn
	Rosemary	Fisher
	Stephen	Fitzgerald
Mr	Paul	Flegg
	David	Fletcher
	Ian	Fletcher
Mrs	Susan	Fletcher
	Julie	Fletcher-Dougherty
Mr	David	Flint
	Richard	Foinette
Mr	Matthew	Ford
	S	Ford
Mr	Jason	Forde
Mrs	Leigh	Forman
Dr	Wayne	Forster
Dr	Derek	Foster
Mr	Gareth	Foster
Mr	Tom	Fowler
Miss	Diane	Fox
Mr	Cyril	Francis
Mr	M	Francis
Mr	Rory	Francis
	Ruairidh	Francis
Mr	Nick	Frayling
Mrs	Louise	Freeman
	Mason & Christine	French
Mr	Peter	French
Mr	Nicholas	Frost
Dr	Danielle	Fry
Mr	David	Fry
Miss	Julie	Furber
	Roy	Fussell
Mr	Andrew	Gainsbury
Dr	O P	Galpin
	Ian	Galt
	Robert	Gandee

Title	First Name	Surname
	Sally	Gandee
Mrs	Nicola	Gane
Mrs	Julie	Gaskell
	Katrina	Gass
	Ph	George
Mrs	Linda	Gershenson
Mrs	Catherine	Gibbons
Mr	Javid	Gilani
	Matthew	Gillard
Mrs	A	Gimblett
Mr	Simon	Glover
	Ian M.	Goddard
	Jennifer	Goddard
	Una	Goddard
	Rebecca	Good
Mr	Mark	Goodger
	John	Goodwin
Mr	Mark	Goodwin DBA.,LRPS.
Dr	Paul	Gordon
Mr	Stuart	Gordon
	Charles & Thalia	Gordon Clark
Mr	Patrick	Gore
Mr	Mike	Gorton
Miss	Helen	Graffham
	Amanda	Graham
	Robert	Graham
Mr	Steve	Grainger
Mr	John	Granger
Mrs	Ceri	Gray
Mr	Brian	Greaves
	Andrea	Green
Mrs	Lynette	Green
	Tim	Green
	Arnold	Greenhalgh
Mr	Richard	Greenwood
	William Paul	Griffin
	Pete	Griffith
	David & Janet	Griffiths
Mrs	Ruth	Griffiths
Mr	Terry	Griffiths
	Terry	Griffiths

Title	First Name	Surname
Mr	Neil	Grinham
Mr	Howard	Grocutt
	Richard	Groves
	Daniel	Guth
	A.M.	Guthrie
Mr	Steve	Hack
Mrs	Christine	Hales
Mrs	Teresa	Halfpenny
Mr	Anthony	Hall
	Mike	Hall
	Sally	Hall
Mr	Stephen	Hall
Mr	Guy	Hamilton
Mr	David	Hand
Mr	Laurence	Hando
	David	Hanell
Dr	David	Hannell
Mr	Mark	Harley
Mrs	Stephanie	Harnett
Mrs	Christine	Harper
Mr	John	Harper
	John	Harper
Mrs	Judith	Harrhy
Mr	David	Harries
Mrs	Susan	Harrington
Mrs	Angela	Harris
Mr	David	Harris
Mr	Neal	Harris
Mr	Peter	Harris
Mrs	Sue	Harris
Dr	Wendy	Harris
Mr	Christopher	Harrison
	Ian	Harrison
Mr	Martin	Harrison
	Matthew	Hart
Mr	Neville	Hart
	Johana	Hartwig
Mr	Thomas	Harward
Mr	Lee	Haskins
Mr	David	Hawke
Mr	Lawrence	Hay

Title	First Name	Surname
Mr	Anthony	Hayes
	David	Haylins
Mrs	Jinny	Hayward
Mr	Peter	Hayward
Mr	David	Hazelden
Dr	Tim	Healing
Dr	Timothy	Healing
Ms	Elizabeth	Heard
	Frank	Heathman
Mrs	Catherine	Heley
	Alan	Hemsley
Mr	James	Henderson
Mrs	Katharine	Henderson
	Peter & Janet	Henderson
	Mandy	Heneghan
Mrs	Roger	Henthorn
Ms	Susan	Heppenstall
	Dave	Hern
Ms	Rhiain	Hewinson
	Kevin	Hewitt
	Colin	Heyman
Mr	Neil	Hickery
	Toby	Higgins
Mr	Cyril	Highman
Mr	Simon	Hiiemae
	Alan	Hill
	Andrew	Hill
Mr	Andy	Hill
Mr	Christopher	Hill
Mrs	Margaret	Hill
Mrs	Hilary	Hillier
Mr	Peter	Hitchings
Mr	Tryfan	Hobbs
Mrs	Barbara	Hobday
Mr	David	Hodges
Mr	Martin	Hole
Mr	Darren	Holems
Mr	John	Holiday
Mr	Christian	Holland
	Martin	Holmes
	Sarah	Holmes

Title	First Name	Surname
Mr	Paul	Holt
Mrs	Caroline	Holt-Wilson
Mrs	Claire	Honess
	Carole	Hopkins
Mr	Dennis	Hopkins
	Graham	Horder
	Vanessa	Horsell
Mrs	Ann	Horton
Miss	Gabrielle	Horup
Mr	John	Hosier
Mr	Jeffrey	Hoskins
Mr	Philip	Hourahine
Mr	Paul	House
	Paul	House
Mr	Stephen	Howard-Jones
	Stephen	Howe
	David	Howell
Mr	Richard	Howell
Mrs	Rosemary	Howell
	Ann	Howells
	Pauline	Huelin
Mr	Brian	Hughes
Mrs	Claire	Hughes
	Jan	Hughes
Mr	Jason	Hughes
	John	Hughes
	John	Hughes
	Michael	Hughes
	Robert	Hughes
Mr	Rod	Hughes
	Simon	Hugheston-Roberts
Mr	Derek	Humble
	Pamela	Humphreys
Ms	Christine	Hunt
	Terence	Hurford
Mr	Atif	Hussain
Mr	Richard	Hutchings
Mr	Steve	Hutchings
	David	Huxtable
Mr	John	Iles
Mr	Peter	Iles

Title	First Name	Surname
	Philip	Inskip
	Owen	Ip
Mr	Paul	Ireland
Mr	Paul	Ireland
Mr	Robert	Jack
Dr	Alasdair	Jacks
Mr	Clive	James
Mr	David	James
Mr	John	James
	John	James
Mrs	Julia	James
Mrs	Marjorie Harris	James
Dr	Martin	James
Mr	Mike	James
	Roger	James
	Susan	James
Mr	Elwyn	Jarrett
Dr	David	Jarrom
Mr	Grzegorz	Jaworski
Miss	Abigail	Jebson
	Brian	Jelf
	Alan	Jenkins
Mr	David	Jenkins
Mr	Lee	Jenkins
Mr	Mark	Jenkins
Mr	Mark	Jenkins
Mr	Michael	Jenkins
	Peter	Jenkins
Mr	Ray	Jenkins
Mrs	Sheena	Jenkins
	Mike	Jennings
Mr	Philip	John
Mr	Vernon	John
Mr	Mike	Johns
Mr	Christopher	Johnson
Miss	Elizabeth	Johnson
	Ian	Johnson
	K.A.	Johnson
Mrs	Lee	Johnson
	Lucie	Johnson
Ms	Sua	Johnson

Title	First Name	Surname
Mrs	Janet	Johnston
	Ian	Johnstone
Miss	Sophie	Jonas
	Andrew	Jones
Mrs	Anne	Jones
Mrs	Carly	Jones
Miss	Ceri	Jones
Dr	Charlotte	Jones
Mr	Chris	Jones
Mr	Christopher	Jones
	Clare	Jones
Mr	D	Jones
Mr	Darren	Jones
Mr	David	Jones
Mr	David	Jones
Mr	David	Jones
	David	Jones
Mr	David Colin	Jones
	Debra	Jones
Mrs	Emily	Jones
	Gareth	Jones
Mr	Grahame	Jones
Mr	Howard	Jones
	Hywel	Jones
Mr	Ian	Jones
Ms	Julia	Jones
	Julia	Jones
Ms	Katherine	Jones
Miss	L	Jones
	Malcolm	Jones
Mr	Matthew	Jones
Mr	Nathan	Jones
Mr	Nick	Jones
Mrs	Olivia	Jones
Mr	Philip	Jones
Miss	Rosy	Jones
Mrs	Sorrel	Jones
Mr	Steve	Jones
Mr	Stuart	Jones
Mrs	Susan	Jones
Mr	Tim	Jones

Title	First Name	Surname
Mrs	Valerie	Jones
Mr	Westley	Jones
Mr	William	Jones
	Patricia	Jones-Jenkins
Mr	Owen	Jordan
	Rachel	Jordan
Mr	Rupert	Joseland
Mr	Howard	Joynes
Mr	Mark	July
Mr	Andy	Karran
Ms	Jan	Keelan
	Gordon J.H	Keeley
	Robert	Keenan
Ms	Lesley	Keetley
Cllr	Martyn	Kellaway
	Arthur	Kemp
Mr	Andrew	Kendall
Mr	James	Kennedy
Miss	Jane	Keogh
Mrs	Joanna	Kerr
Mrs	Penelope	Kerr
Mrs	Ellen	Kershaw
	John	Keruish
	James	Keyse
Mrs	Yvonne	King
Mr	Tim	Kingston
	Paul	Kinnersley
	Ian	Knight
Mr	John	Knight
Mr	Jonathan	Knight
	Amanda	Knopp
Dr	Jay	Kynch
	Richard	Lake
Mr	Mark	Lane
Mr	Robert	Lane
Mr	Steve	Lane
	Bill	Lang
Miss	Caroline	Langdon
Ms	Amanda	Langley
	Tom	Langton
Mr	Ian	Lapthorn

Title	First Name	Surname
Dr	Ben	Lau
Mr	Anthony	Lawrence
Mr	Ian	Lawrence
	Lambrick	Lawrence
	Philip	Lawrence
Ms	Tracey	Lawrence
Mrs	Jeanette	Lawrenson
Miss	Sophie	Lawrenson
	Sophie	Lawrenson
Mr	David	Layton
	David	Layton
Mr	David	Leat
	Amy	Lee
	Hilary	Lee
Mr	James	Lee
Mr	Gareth	Lee-Allen
	Iestyn	Leek
Mr	Stephen	Leek
Mr	Darren	Lees
Dr	Roger	Legg
	Andrew	Leighton
Mrs	Chris	Leighton
Mr	Martyn	Lennon
Mrs	Frances	Lester
Ms	Maria	Lester
Mr	John	Lewer
Mrs	Abigail	Lewis
Mrs	Anne	Lewis
Miss	Beverley	Lewis
Mr	Chris	Lewis
Mr	Darren	Lewis
	Eldon	Lewis
Miss	Elizabeth	Lewis
Ms	Jayne	Lewis
Mr	John	Lewis
Mr	Joseph	Lewis
Mr	Kevin	Lewis
Mr	Mark	Lewis
Mr	Peter	Lewis
Mr	Simon	Lewis
	Vernon	Lewis

Title	First Name	Surname
Mr	Nick	Lia
Mr	Thomas	Lia
Miss	Bernice	Liddington
Mr	Ben	Lidgey
Dr	Catherine	Linstrum
Mr	Christopher	Llewellyn-Jones
Mrs	Brenda	Lloyd
	Claire	Lloyd
Mr	Dewi	Lloyd
	Edwina	Lloyd
	Emma	Lloyd
	Jill	Lloyd
Ms	Nerys	Lloyd-Pierce
	Peter	Locke
	Julie	Lockett
Dr	Hannah	Loebl
	John	Loebl
	Ruth	Loebl
	Paul	Long
	Richard	Loosmore
Dr	Robin	Loveland
	Ruth	Lovell
Ms	Glenda	Lowe
Mr	Laurence	Lowe
	Stephen	Lowe
Miss	Helen	Lucas
	Robert	Lugg
Ms	Katie	Luxton
	Emma	Lynch
Miss	Sinead	Lynch
Ms	Caroline	Lynch-Blosse
Mr	Stephen	Lyons
Ms	Glynis	Macdonald
Mr	Brian	Mace
	Steve	Macsorley
Mr	W A	Manchester
	Colin	Mansell
Mrs	Fay	Mansell
Mr	Keith	Marchant
Mr	Ronald	Marchant
Mrs	Catherine	Marlowe

Title	First Name	Surname
Ms	Amanda	Martin
	Geoff	Martin
Mr	Jeremy	Martin
Ms	Patricia	Martin
Mr	Andrew	Mason
Mr	Crispin	Masterman
Mr	John	Mather
	Peter	Mathias
Mr	Clive	Matthews
	Jonathan	Matthews
	Robert	Mattin
	Ken	Maurice
Mr	Christopher	May
Miss	Sophie	May
Mr	Michael	Mayled
Mrs	Sasha	Maylin
Mrs	Alison	Mcbain
	Jools	Mccarthy
Mr	Alistair	Mccormick
Miss	Karen	Mccullough
Mr	Andrew	Mcdermid
	Philip	Mcdermott
Mr	Alastair	Mcdougall
Mr	David	Mcdowell
Mr	Sean	Mchugh
	Susanna	Mcintyre
Miss	Sarah	Mcleod
Prof	Mary	Mcmurran
Miss	Elinor	Meloy
	Catherine	Mendez
Miss	Samantha	Meredith
Miss	Michelle	Merrill
Mr	Michael	Messenger
Mr	Cellan	Michael
	David	Midgley
Mr	Alun	Milcoy
Mr	Frank	Miles
Mr	Stephen	Millson
Mr	Jonathan	Mitchell
Mr	Niall	Mitchell
Mr	David	Mobbs

Title	First Name	Surname
Mr	Paul	Mogford
Ms	Louise	Money
Mr	Paul	Moon
Mr	Christopher	Moore
	Jeremy	Moore
Mrs	Anna	Morgan
	Donald	Morgan
Mrs	Elizabeth	Morgan
Miss	Laura	Morgan
Mr	Richard	Morgan
Dr	Robert	Morgan
Mr	Robert	Morgan
Mrs	Sharon	Morgan
Mr	Terrence	Morgan
Miss	Clare	Morgans
	Amy	Morris
Mr	Clive	Morris
Mr	Colin	Morris
Mr	John	Morris
Mr	Ray	Morris
	Richard	Morris
Mr	Rodney Edward	Morris
Mrs	Louise	Morse
Mr	Richard	Morse
Mr	Kenneth	Morton
Dr	Paul	Morton
	Sandra	Morton
Mr	Christopher	Moss
	Nicholas	Moylan
Mr	Spencer	Mumford
Mr	David	Mundow
Prof	Denis	Murphy
Mr	Noel	Muteham
Dr	Sally	Naish
Dr	Ken	Neal
Miss	Fiona	Neil
Mr	Christopher	Nelson
Mr	Oliver	Newcombe
Mr	David	Newland
Mr	David	Newman
Mrs	Genevieve	Nickolls

Title	First Name	Surname
	John	Norris
	Marc	Norvill
Mr	Richard	Nosworthy
Mr	Robert	Nottage
Mr	Ameryst	Oak
	Stephen	O'brien
	Hugh	O'donnell
Mr	Michael	O'donovan
Mr	Chris	O'driscoll
Mr	Geoff	Ogden
Mr	William	O'keefe
Mr	Peter	Oldfield
Mrs	C	Oliver
Ms	Kay	Oliver
Mr	John	Olsen
Mrs	Fiona	Openshaw
	Karl	Orbell
Mr	Robert	Ormerod
Mr	Andy	O'rourke
Mrs	Carol	O'Rourke
Mr	David	Osborn
	Claire	Osborne
Mr	David	O'Shaughnessy
Mr	Paul	O'sullivan
Dr	Gillian	Otlet
Dr	Anthony	Owen
Mr	Arthur	Owen
	David	Owen
Mr	John	Owen
	Berwyn	Owens
Mr	Alun	Page
Mrs	Andrea	Page
Mr	Glenn	Page
Mr	Neil	Page
Ms	Emma	Palmer
Mr	John	Palmer
Mr	Jonathan	Palmer
	Mary	Palmer
	Trevor	Pannell
	David	Pantry
Mr	Stephen	Pantry

Title	First Name	Surname
Mr	Stephen	Paradise
	Helen	Pargeter
Mr	Andrew	Park
Mr	William	Parke
Mr	Alan	Parker
Mr	Don	Parker
Mrs	Eleanor	Parker
Mr	Henry	Parker
Mrs	Rosemary	Parkhouse
Ms	Fiona	Parnaby
Mr	Glyn	Parry
Miss	Katie	Partington
Mr	Dick	Partridge
	Charles	Pattinson
Mrs	Christine	Pattison
Ms	Jacqueline	Peacock
Miss	Jennifer	Pearce
Mrs	Lucy	Pearce
Mrs	Nicola	Pearce
Mr	Richard	Pearcy
	Richard	Pearcy
Ms	Polly	Pearshouse
Dr	Adrian	Pearson
Prof	Paul	Pearson
	Richard	Pearson
Mr	Brian	Pentland
	Jane	Percy
Mr	Michael	Peres Da Costa
	Mike	Perkins
Mrs	Margaret	Perring
Mr	Glen	Perry
Dr	Hilary	Perry
Mr	John	Perry
Mrs	Melissa	Perry
Mr	Michael	Perry
	Tessa	Perry
Mr	Keith	Phillips
	Rebecca	Phillips
	Stuart	Phillips
Mr	David	Philp
	Mark	Philpott

Title	First Name	Surname
	Verity	Picken
Mr	Anthony	Pickup
Dr	Chris	Piddington
Mrs	Claudia	Pinches
Mr	Maurice	Pinches
	Megan	Pinnell
Mrs	Claire	Piper
	Bryn	Pitcher
Mr	Allan	Pitt
Ms	H	Pitt
Mr	Mike	Pitt
Mr	William	Pitt
Mr	Keith	Plow
Dr	John	Plowman
Dr	Alexandra	Pollard
Mr	Neil	Pollard
	Nick	Pooler
Miss	Marion	Pope
Mr	Martin	Potter
	Maureen	Potter
Mr	John	Poulton
Mrs	Carolanne	Powell
Mr	David	Powell
Mr	Ian	Powell
Ms	Kay	Powell
Mr	Martin	Powell
Mr	David	Powrie
Prof	Kenneth	Prandy
Ms	Frances	Preedy
Miss	Linda	Prenderville
Mr	Ian	Preston
Mr	John	Preston
Mr	Julian	Price
Mr	Warren	Price
	Sandra	Prince
Mr	Andrew	Pring
Mrs	Keri	Pritchard
Mr	Robert	Pritchard
	Robert	Pritchard
Mr	Simon	Pritchard
Mrs	Liz	Procter

Title	First Name	Surname
Mr	Michael	Procter
Mr	Albert	Proctor
Mr	David	Proffitt
Mr	Dean	Protheroe
Ms	Sue	Proudlove
	Paul	Pudney
	Jacqueline	Pugh
Mr	John	Putman
Miss	Laura	Pyke
Mrs	Helen	Radcliffe
Mr	Jeremy	Randles
	John	Random
	Mike	Ratcliffe
Mr	Richard	Raybould
	Martin	Reader
	Pamela	Reading
Dr	Mark	Reardon
	Nicholas	Reason
Mrs	Alison	Reed
Miss	Beverly	Reed
	Marian	Reed
Mr	David	Rees
Mr	Simon	Rees
	Barnaby	Reeves
Ms	Bettina	Reeves
	Colin	Reeves
Mr	Michael	Reeves
Dr & Mrs	K J & R H	Regelous
Mrs	Mary	Rendell
	Margaret	Renshaw
Dr	Christopher	Retallick
Miss	Rose	Revera
Mr	Jeffrey	Rice
	Heidi	Rich
	Helen	Rich
Mrs	Katharine	Rich
Mrs	Lindi	Rich
Mr	Andy	Richards
Mr	Bruce	Richards
Mr	David	Richards
	Sue	Richards

Title	First Name	Surname
	Susan	Richardson
Mrs	R	Rickard
	Paul	Ridealgh
Dr	Tracey	Rihll
Mrs	Lorna M.	Riley
Fr	William	Ritchie
Ms	Be	Ro
	Alexander	Roberts
Mr	Andrew	Roberts
Mr	Antony	Roberts
	Dafydd	Roberts
Mr	Garrod	Roberts
Mr	Ifan	Roberts
Miss	Karen	Robins
	Lisa	Robinson
	Karen	Roden
Mrs	Andrea	Rodley
	Alan C.	Rogers
Mr	Clive	Rogers
	Natakie	Romano
Miss	Katherine	Ronchetti
Mr	Stuart	Room
Dr	Martin	Roscoe
Mr	Elliot	Ross
Miss	Maria	Routley
Mr	David	Rowan
Mrs	Heather	Rowe
Mr	David	Rowlands
Dr	Andrew	Ruddle
Mrs	Hazel	Rudland
	Janet	Rumsey
	Harry	Rundle
	Neil	Rushton
	Jo	Russell
Mrs	Rosemary	Russell
Mr	Julian	Sadler
	Francesca	Salmon
Ms	Emma	Salvato Smith
	Pina	Sammartino
Mrs	Elizabeth	Samphire
Mr	Michael	Samuel

Title	First Name	Surname
Mr	Graham	Sanders
	Mary	Sanders
	Nick	Sandford
Mrs	Susan	Sandham
Mrs	Susan	Sandham
Mrs	Angela	Sandles
	David	Sankson
Mr	Mark	Satchell
Dr	Stephen	Satterthwaite
	Camilla	Saunders
Ms	Angela	Saunderson
Ms	A	Scarfi
	Claire	Scott
Mr	David	Seels
Mr	Mark	Seymour
Mr	David	Sharp
	Josh	Shaw
Ms	Susan	Shaw
Mrs	Danielle	Sheahan
Mrs	Rebecca	Sheahan-East
Mr	John	Sheen
Mr	Bob	Shepherd
	Chris	Shepherd
	Tony	Shepherd
	Mark	Sheppard
	Gaye	Sheridan
	Jennie	Simons
Mr	Graham	Sims
Miss	Emily	Sinclair
Mrs	Gillian	Sivertsen
Mr	Ian	Skinner
Ms	Paula	Skyrme
Mr	Philip	Slater
Mr	Shaun	Slaughter
Mr	Barrie	Small
Mrs	Charlotte	Smart
Miss	Sarah	Smart
Mrs	Anne	Smith
	Annie	Smith
Ms	Carol	Smith
Mr	Geoffrey	Smith

Title	First Name	Surname
Ms	Jane	Smith
Mr	M	Smith
Mr	Nicholas	Smith
	Peter	Smith
Mrs	Susan	Smith
	Gordon	Smith-Vieira
	Keith	Snell
	Roger	Snook
Mr	Edmund	Somerville
Mrs	Sharon	Spackman
Mr	Steven	Spence
Mr	Ian	Spencer
Ms	Gayle	Spillane
Mr	Darryl	Spittle
	Paul	Spooner
	Richard	Spooner
Mr	Nhatuveetil	Sreekumar
Mr	Kevin	Stables
	Iwan	Standley
	Tom	Stanger
Mr	Lee	Stephens
Mr	Rachel	Stephens
	Robert	Stephens
Mr	Wiard	Sterk
	Bridget	Stevens
Ms	Gillian	Stevens
Mr	Kevin	Stevens
Mr	Roger	Stevenson
	David	Stewart
Mr	James	Stewart
	Ron	Stewart
	Elizabeth	Stokes
Dr	Alison	Stone
	Christopher	Stott
Ms	Stina	Strangis
	Alex	Strangward
Mrs	Lesley	Strawson
	Lesley	Strawson
	Caroline	Street
Mrs	Diana	Street
	Pat	Stride

Title	First Name	Surname
Ms	Jill	Stringfellow
Mr	Michael	Strong
	Rachel	Stroud
Ms	Rachel	Stubley
	Steve	Sudlow
	David	Sutherland
Mr	Chris	Sutton
Mr	Paul	Sutton
	Barbara	Symons
Dr	Caroline	Syred
Dr	Katherine	Syred
Prof	Nicholas	Syred
	Gareth	Tanner
Mr	Robyn	Tanner
	Bob	Tanswell
Ms	Alison	Taylor
Mr	Chris	Taylor
	Chris	Taylor
Mr	David	Taylor
Cllr	Frances	Taylor
Mr	Jonathan	Taylor
Mt	Marc	Taylor
Mr	Paul	Taylor
Mr	Roger	Taylor
	Shirley	Taylor
	Andrew	Thomas
Miss	Dana	Thomas
	Dana	Thomas
Mr	David	Thomas
Mr	Edmund	Thomas
Mr	Elliot	Thomas
Mr	Gareth	Thomas
Mr	Ian	Thomas
	Keith	Thomas
	Michael	Thomas
	Natalie	Thomas
Mr	Nathan	Thomas
Mr	Owain	Thomas
Mrs	Patricia	Thomas
Mr	Peter	Thomas
	Raymond	Thomas

Title	First Name	Surname
Mr	Rhys	Thomas
	Ryan	Thomas
	Vera	Thomas
	Gillian	Thompson
	John	Thorn
	David	Thorne
Mrs	Deborah	Thornton
Mr	Cezar	Tigaret
	Brian	Timson
Mr	Olaf	Torjesen
Miss	Allison	Tovey
Mr	Damian	Townsend
Miss	Christine	Trow
	Michael	Turley
Mr	Mark	Turner
Mr	Paul	Turner
Mr	Paul	Twyman
Ms	Linda	Tyler
Mr	Robert	Tyler
Dr	Stephanie	Tyler
Mrs	Toni	Van Der Linde
Mr	Marc	Van Der Zwan
	Vanessa	Van Eecke
	Amy	Vanstone
	D.	Vaughan
Mr	Martyn	Vaughan
Mr	Owain	Vaughan
	Vivienne	Vick
M.	Jérôme	Vuarand
Mrs	C	Vyner
	Eleanor	Wade
	Steve	Wadley
	Elizabeth	Wainwright
	Howard	Wainwright
Mrs	Emma	Wakeham
Ms	Christine	Walby
	Mary	Walker
Dr	Pete	Wall
Mrs	Rosie	Wall
Ms	Tamsin	Wallbank
Mr	Robert	Waller

Title	First Name	Surname
	Max	Wallis
	Deb	Walls
Mr	David	Walters
Mr	Gareth	Walters
	Sandy	Walther
	Aimee	Ward
Mrs	Barbara	Ward
Mr	Mark	Ward-Jones
	Ian	Warren
	Vic	Warren
	P	Warwick
	Sue	Watchurst
Mr	Richard	Waters
Mr	Stuart	Waters
	Christopher	Watkins
	Russell	Watkins
	Tim	Watson
	Joyce	Watson Am
Mr	David	Watt
	Graham	Wattley
	Andy	Wattson
	Nick	Webb
Mr	Ryan	Weller
Miss	Sarah	Wells
Mr	Terry	Wells
	Carl	Welsby
	Edward	Wesson
	Angela	West
Mr	Julian	Westwood
Mr	Simon	Wetter
Mr	Thomas	Wheeler
	Anthony	White
Mr	Bernard	White
Mr	Chris	White
Ms	Liz	White
	Richard	White
Mr	Kevin	Whitehead
	Kevin	Whitehead
Mr	William	Whitehead
Mr	Phil	Whitney
Mr	Kenneth	Whittaker

Title	First Name	Surname
	Kenneth	Whittakker
Miss	Felicity	Widlake
Dr	Lizzie	Wilberforce
Mr	Andrew	Wildin
	Brian	Wiles
Mrs	Lesley	Wilford
Mrs	Patricia	Wilkins
	Mark	Willet
	Bleddyn	Williams
Mr	Charles	Williams
	Dave	Williams
Mr	David	Williams
	David	Williams
	Debra	Williams
Mrs	Eleanor	Williams
Mr	Geoffrey	Williams
Mr	Gerrard	Williams
	Gethyn	Williams
Mr	Graham	Williams
Mrs	Gretel	Williams
Mr & Mrs	H J & M A	Williams
	J	Williams
	Jeremy	Williams
Mr	Jonathan	Williams
Ven	Jonathan	Williams
	Melindwr	Williams
Ms	Pam	Williams
Mr	Peter	Williams
Mr	Richard	Williams
Mr	Robert	Williams
Miss	Sally	Williams
Mr	Steven	Williams
Mrs	Alison	Willott
Mr	Andrew	Wilson
	Anna	Wilson
	Elizabeth	Wilson
	Ian	Wilson
Mr	Jon	Winder
Miss	Natalie	Witchard
	Mel	Witherden
Mr	Barry	Woodman

Title	First Name	Surname
Mrs	Claire	Woodman
Mr	Gareth	Woodman
	Cyril	Woodroffe
Mr	Brian	Woods
Mr	John	Woodward
Dr	Chris	Wooff
	Chris	Wooff
Mr	Darren	Woolfall
	Arnold	Woolley
	John	Woolven
Mr	N	Worman
	Liz	Worsley
	Tim	Wort
	Michael	Worthington
Miss	Belinda	Wreford
Mr	Colin	Wright
	Jenny & David	Wright
	Jim	Wright
Mr	Martyn	Wright
Mr	Peter	Wright
	Tim	Wright
	Nick	Wysoczanskyj
Mr	Edward	Yarnold
Mr	Mark	Young
	Simon	Young
	Dominique	
	Lorna	

10 Appendices
