

**Public Local Inquiry into the
Draft Scheme and Draft Orders
for the proposed
M4 Corridor around Newport**

**Summary
Proof of Evidence**



**Peter A. Ogden, BSc MRTPI
Director
Campaign for the Protection of Rural Wales**

Document Reference: CPRW 1(ii)

February 6th 2017

Summary of the Campaign for the Protection of Rural Wales'

Proof of Evidence

1. I am Peter A. Ogden BSc. MRTPI, Director of the Campaign for the Protection of Rural Wales (CPRW).
2. I have a BSc (Hons) degree in Geography, am a Member of the RTPI, a member of the IUCN's World Commission on Protected Areas and one its Technical Advisors on World Heritage matters.
3. I have 40 years' experience in environmental and landscape planning, advising and appraising the importance of and scope for landscapes to accommodate change.
4. I represent CPRW, which campaigns to conserve and enhance the landscapes of rural Wales' and safeguard the interests of those who live in, depend upon or enjoy these rural environments.
5. **CPRW objects to the proposed M4 Relief road.** This Proof of Evidence is one of two complementary statements justifying our objection submitted by Mr Vic Warren, Chairman of CPRW's Newport and Valleys Branch.
6. CPRW's evidence focuses on
 - The adequacy of Welsh Government's assessment of the impacts of their road proposal on the landscapes of the Gwent Levels, its surroundings, their associated qualities and public values.
 - The manner the Environmental Statement fulfils the requirements of the Environment (Wales) Act 2016.
7. This evidence is based in part, on my interpretation of professional advice provided by Mr Simon White, DipLA, DipUD (Dist) MA. CMLI of White Consultants, Cardiff

8. Notwithstanding our objection to the scheme, we endorse the M4 NGO Environmental Group's Joint Statement that.
- The scheme is not needed nor justified given its objectives can be achieved by alternative less environmentally damaging means.
 - The road would have significant unacceptable impacts on the nationally important habitats and biodiversity of the Gwent Levels, and associated ecosystems.
9. This evidence doesn't replicate the submissions of our partner environmental NGOs.

The importance of all Welsh landscapes

10. The European Landscape Convention recognises **"All landscapes matter"** and each defines a location's sense of place and the quality of life it offers for those who live in or depend on it. The Convention also states that because a landscape is not designated, that does not devalue its importance locally.
11. The importance of our landscapes and ecosystems is specifically recognised as a dimension of public wellbeing in the Wellbeing of Future Generations Act (2015). The Welsh Government's Draft Natural Resources Policy, also recognises
- ***Improving the quality and connectivity of our habitats;***
 - ***Retaining the distinctiveness of our places and historic landscapes;***

as Key Challenges in achieving the sustainable use of natural resources.

The landscape and cultural resources of the proposed route

12. Welsh Government Interim Advice note 135/10 (Wales), describes a "Landscape resource" as
- "...the interplay of the physical, natural and cultural components of our surroundings. ... Character is not just about the physical elements and features that make up a landscape, but also*

embraces the aesthetic, perceptual experiential aspects of the landscape that make different places distinctive'

13. It continues

"...whilst designated areas will tend to be highly valued, the majority of the country comprises undesignated areas which can still be of high quality and/or of great local importance. The local landscape is usually intimately understood by the people who live and work there, but its value is often overlooked or underestimated in landscape assessments."

14. Landscapes therefore have inherent values and added associative values with the "*perceptual experiential aspects of the landscape*" contributing to their character. The importance of the relationships between man and nature, people and place and the past and present are therefore far greater than simply the sum of their individual values.

15. If these relationships are not considered as one, a location's overall distinctiveness is undervalued and any assessment of change on its values and sensitivity, may be underestimated.

16. Because this shift recognises landscapes as combinations of value added resources, it follows the diversity, significance and benefits these value systems provide, must be fully assessed and the consequences of change to them fully accounted for in relevant decision making processes.

17. CPRW does not believe the Welsh Government's Environment Statement addresses these issues fully.

The effects of the route on the landscape

18. The Welsh Government's Environmental Statement admits the road will cause major long term impacts to the character and heritage value of certain Local Landscape Character Areas of the Gwent Levels and the Gwent Levels Historic Landscape.

19. The significance of these impacts are also registered by Natural Resources Wales and CADW both contending that the integrity of the distinctive landscapes of the Gwent Levels and its surroundings, would be adversely compromised should the scheme proceed.

The Landscape Visual Impact Assessment (LVIA) method

20. Whilst acknowledging the LVIA is broadly in line with current guidance, this guidance and the LVIA has only three categories of adverse magnitude of change Major, Moderate, Minor.
21. The effects of the road on the landscape can therefore be understated given the marked difference between “*major adverse*” i.e. total loss or large-scale damage, and “*moderate adverse*” i.e. partial loss or noticeable damage.
22. Although the LVIA acknowledges the overall significance of effects on the Gwent Levels landscapes, (LLCAs 2 and 7) are large adverse, we believe the scale of impacts are at the top end of that level of significance.
23. We therefore conclude the road’s impact could be justified as major/moderate as it is likely to be a prominent feature, very noticeable and significantly out of character with the Gwent Levels’ landscapes not only because of its physical appearance but for two other reasons;
- Its effects on a crucial landscape value of this area, its tranquillity / undisturbed character.
 - The increase in clutter resulting from its construction.

The effects of the road on the undisturbed character and tranquillity of the Gwent Levels.

24. Our evidence highlights the Gwent Levels having qualities of tranquillity and darkness which add value to its undisturbed character. Whilst these are not the highest category of “undisturbed area” in Wales, they are important and contribute to the area’s’ distinctiveness.
25. The Welsh Government’s assessment understates the road’s impact on this quality. The use of neutral language to describe the impact of the road on Wentlooge Levels illustrates its failure to qualify the effect fully. Instead of

assessing the actual magnitude of the effect, the relevant text merely expresses the potential effects on the perceptual aspects. The equivalent assessment of Caldicott Levels, makes no mention of the road on its tranquillity.

The Baseline landscape situation

26. The Landscape and Visual Effects section of the Environmental Statement illustrates Zones of Theoretical Visibility which fairly show development currently visible from the Gwent Levels and other areas.
27. Whilst this assists in illustrating the baseline situation, a fundamental difference exists between the character of existing developments which are static and emit relatively small levels of noise and that when constant flows of moving traffic day and night, emitting additional noise prevail. These additional effects would be significant compared to the comparatively undisturbed circumstances which currently characterise the Gwent Levels and its surroundings.
28. The Cultural Heritage section of the Environmental Statement also highlights that additional road noise affects *“a person’s ability to appreciate the historic landscape”* and

“...This is a high value heritage asset and the consequent significance of effect has therefore been assessed as large.”

The addition of further clutter in the landscape

29. Previously noted adverse impacts will be further compounded by the additional clutter associated with road’s construction and operation. Ancillary features such as gantries and lighting will be very noticeable, as will the movement of high sided vehicles across essentially a previously static landscape.
30. All these factors lead CPRW to believe the road’s impact will be more significant than the Welsh Government indicate.

The sustainability credentials of the proposed road scheme

31. Whilst the LVIA appears to be substantially in line with current guidance, its associated Sustainability Assessment has been challenged by the Future Generations Commissioner, We defer the Inspector's judgement as to whether the revised Appraisal satisfies these concerns.
32. Irrespective of that, in terms of the road's sustainability credentials from a landscape perspective, Mr John Davies judges;

"... the landscape impact associated with the physical presence of this new section of motorway, in a landscape currently lacking such infrastructure, would remain by 2037 in a number of Landscape Character Areas of very large, large or moderate adverse significance."

33. He judges the road's impact,

"... on the Gwent Levels Landscape of Outstanding Historic Interest as 'large adverse'."

How the road scheme reflects the requirements of the Environment (Wales) Act

34. This Act places a duty on Welsh Ministers to further the Principles of Sustainable Management of natural resources.
35. Despite the enactment of this legislation, the Environment Statement includes no reference to this matter.
36. From a Sustainable Land use Planning perspective, Mr Davies states however that because the road

"...would conflict with planning policies in respect of cultural heritage, landscape, ecology and nature conservation. it would not comply with the fourth part of the planning policy definition of the sustainable development principle in PPW"

37. He finally judges

“ I give some weight to my conclusions, first, that the Scheme would meet all but one part of the planning policy definition of the sustainable development principle and, second, that it would satisfy the sustainability objectives defined in PPW and so would contribute to the Well-being goals in the 2015 Act.

Against this I give considerable weight to the impact on the SSSIs, the long term effect on the landscape and the impact on heritage assets”

38. Clearly the sustainability credentials of the proposed road cannot be wholly or satisfactorily substantiated as it fails a fundamental sustainability test which Welsh Government is legally obliged to fulfil.
39. CPRW’s concludes the Welsh Government assessment of the new road has underestimated three fundamental issues;
 - The overall significance of its impact on the landscapes through which it passes.
 - The magnitude of these impacts, given the area’s visual, sensory and cultural values should be considered as one.
 - The lack of an objective assessment of the area’s ecosystems services, their associated values and the scheme’s impacts on them.
40. We therefore respectfully request the Inspector to ascribe significantly greater weight to the landscape importance of the Gwent Levels, its surroundings and the scheme’s impacts on their values when judging the balance of the road’s environmental impacts against its supposed merits.