
WRITTEN STATEMENT

Michael Webb

ON BEHALF OF

GWENT WILDLIFE TRUST

In the matter of:

**Public Local Inquiry into the M4 relief road around Newport: The effects of the
proposed M4 extension across the Gwent Levels**

February 2017

Introduction: I am Michael Webb. I am an officer of the Gwent Wildlife Trust, and a chartered town planner. I hold a BSc (Hons.) in Environmental Biology and Plant Biology from Queen Mary College, University of London, and a MSc in Environmental Planning from Liverpool John Moores University. I have 18 years' experience as a planner, in both the statutory and non-statutory sectors.

Background: The Welsh Government routinely provides consultation reports in respect of its consultations, in the interests of transparency and good governance. It does this in order that people and communities throughout Wales may gain a full appreciation of the breadth and strength of opinion on the matter which has been consulted upon.

This written statement will show that the Consultation Report pursuant to the Draft Orders application produced by the Welsh Government is deficient, for the following reasons:

1. The Consultation Report fails to refer to the majority of the Gwent Wildlife Trust's (and others') reasons for objection, even though these reasons are clearly material considerations. Even in instances where it does refer to such material considerations, in the majority of cases, it merely name-checks them, and makes no attempt to refer to their substance, much less consider the merits of their argument.
2. Where summaries exist of elements of GWT's objection, they are inaccurate, trivialising and even sometimes factually incorrect.
3. Objections Lodged by Members of the Public with the Assistance of Environmental Charities: The Consultation Report is deficient in the way in which it addresses the large number of legitimate objections lodged by people and communities throughout Wales and beyond. These deficiencies consist of:

- A. Summarily dismissing thousands of legitimate objections, based on material considerations, by giving then the same weight as one objection. This is deficient because firstly it ignores the sheer weight of legitimate opinion expressed by such a large group of people and communities, and secondly because in doing so, the Welsh Government implies that the very fact that such people/communities chose to accept the guidance of charities in order to better frame their objections in some way completely de-legitimises their concerns. This is in direct contradiction to the stated aim of the Welsh Government to work positively with the Third Sector in Wales.

We are firmly of the view that, far from de-legitimising these concerns, the fact that people and communities actively sought out charities in order to obtain assistance, should actually increase the weight given to them, rather than the opposite.

- B. Failing to notice or ignoring the fact that many of the thousands of such objections dismissed out of hand by the Welsh Government also included “bespoke” material.

In conclusion, we consider that the downplaying and misleading representation of the huge groundswell of opinion and reaction to this damaging proposal is a deliberate ploy on the part of the Welsh Government, in order to create the incorrect impression that there is little or no opposition to it, either in South East Wales or beyond. The sheer area of SSSI which would be destroyed directly by it makes it one of the most damaging current consent applications in the whole of the UK (and this is excluding indirect damage, which could be far larger even than that), and the habitats and species that would be destroyed are of UK and European importance. It is little wonder then, that the proposal has attracted such a huge number of objections, which the Welsh Government appears keen to ignore.