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# Hearing Statement

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## M4 Corridor Around Newport Public Inquiry

Prepared on behalf for:

St Modwen Developments Ltd

by:

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### **PREFACE - PROFILE AND DECLARATION OF TIM GENT**

I am Tim Gent and I am a member of the Royal Town Planning Institute, with over 25 years of experience as a Chartered Town Planner. I hold a Bachelor of Arts (Honours) Degree in Town and Country Planning. I have been a member of the Royal Town Institute since 1992.

I am a Director of Savills, which has one of the largest teams of planners in the UK.

I have advised on all matters of town planning, regeneration and development consultancy. I have experience in all aspects of planning advice and the management of the planning / appeal process, together with the making of representations to the development plan process, for both public and private sector clients throughout the United Kingdom.

I have worked in South Wales for over 20 years – with a focus on the areas along and around the M4 corridor

I have worked with St Modwen Developments Limited for about twelve years. I was the agent for the outline planning application at the Llanwern Regeneration Site (which is now known as Glan Llyn), and have continued to provide planning advice on strategy and reserved matters applications and the Newport Unitary and Local Development Plans. I also work on the company's other development projects in South Wales which include Coed Darcy, Baglan Bay and Swansea University.

I have reached my conclusions independently and the evidence I am giving is based on my own professional judgement.

# Hearing Statement

## M4 Corridor Around Newport Public Inquiry

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<b>1.</b>	<b>Introduction</b>	<b>4</b>
<b>2.</b>	<b>The Glan Llyn Regeneration Scheme</b>	<b>5</b>
<b>3.</b>	<b>Description of the Black Route and Alternatives</b>	<b>8</b>
<b>4.</b>	<b>The Black Route</b>	<b>13</b>
<b>5.</b>	<b>The Blue Route</b>	<b>16</b>
<b>6.</b>	<b>Conclusion</b>	<b>22</b>
	<b>Appendices</b>	<b>25</b>
	Appendix A Approximate Site Location on Aerial Photograph	26
	Appendix B Value of Housebuilding Infographic	27
	Appendix C Newport LDP Proposals Map	28
	Appendix D Indicative Masterplan	29
	Appendix E Western Sub Area Masterplan	30
	Appendix F Site Photographs	31
	Appendix G Masterplan Showing 100m and 200m Contours from Queen's Way	32

## 1. Introduction

- 1.1. This statement is submitted to the M4 Corridor Around Newport Public Inquiry (the Inquiry) on behalf of St. Modwen Developments Limited (SMDL). SMDL is the owner and master developer of the Glan Llyn regeneration scheme which forms the focus of Newport's Eastern Expansion Area. Glan Llyn is one of Wales' largest regeneration schemes and proposes 4,000 new homes together with 1.5million square feet of new business space. The scheme will recycle and transform 243 hectares (600 acres) of previously developed land (until the early 2000's, and its closure by Corus, the site was the heavy end of the Llanwern Steelworks).
- 1.2. Regeneration of the site is now well underway. Outline planning permission for the whole scheme was granted in 2010 and since then the site has been investigated and prepared (as part of a phased strategy), infrastructure provided and new greenspace created. The first areas of housing are either completed or underway (to the west) and a new pub/restaurant has been opened in the local centre. To the east, work on what is known as the Celtic Business Park has also begun and the first unit was occupied just before Christmas.
- 1.3. A plan showing the location and extent of the Glan Llyn site is included as **Appendix A** to this statement.
- 1.4. SMDL has taken a consistent interest in proposals for an M4 relief road around Newport. Its position has been consistent too:
  - a) it has generally supported the principle of a **new** M4.
  - b) it has expressed serious concerns about any alternative route that runs alongside Glan Llyn. The Queen's Way or A4810 forms the **2km southern boundary of the site** and proposals for major change to the form or function of this route or conditions along it could have a significant impact on Glan Llyn.
- 1.5. This statement covers both matters. Following this introduction, section 2 describes the Glan Llyn scheme – and the progress made there - in a little more detail. Section 3 then records our understanding of the black route and the principal alternative to it (with a focus on what is known as the blue route). Section 4 sets out our position on the black route and section 5 reports our concerns with any proposal to pursue the blue route alternative. Section 6 provides a short conclusion summary (which also acts as the general summary to this statement that the Inquiry requires).

## 2. The Glan Llyn Regeneration Scheme

### Background

- 2.1. The Glan Llyn scheme is a very significant regeneration project. It sits on the eastern edge of Newport and extends across 243 hectares of previously developed (or brownfield) land. The site (and the Eastern Expansion Area that it forms part of) is one of the cornerstones of the City's sustainable growth strategy. The basic proposition is a new neighbourhood of 4,000 new homes in a high quality (and transformed) environment, a local centre and a business park (known as the Celtic Business Park or CBP) capable of accommodating 1.5million square feet of business space.
- 2.2. The site is rectangular in shape with longer sides of approximately 2km and shorter sides of 1km. Its western boundary is formed by Newport Retail Park District Centre, its northern boundary by the Tata and main railway lines and its eastern boundary by the retained Tata Llanwern Steelworks. Its long southern boundary is formed by the Queen's Way (the A4810).
- 2.3. The scheme is expected to take about 20 years to complete, by which time it will have created or supported 6,000 jobs. Many of these will have come from the development of the new housing on the site<sup>1</sup>. The project requires long term vision and long term commitment. SMDL has provided both. It is one of the UK's leading regeneration companies and acts as master developer and is responsible for installing the new hard and soft infrastructure and landscaping. SMDL has established a Management Company to maintain the new development and will develop most of the business park itself. Individual home builders, housing associations and other bodies will be responsible for the new homes

### Planning Policy and History

- 2.4. The Glan Llyn concept responded to the closure of the former Llanwern Steelworks site. In its Unitary Development Plan (or UDP), Newport City Council (NCC or the Council) allocated the former 'heavy end' of the steelworks and other land in the vicinity as the Eastern Expansion Area (EEA). This allocation continues in the adopted Local Development Plan (LDP). The strategy of the LDP recognises that the EEA is integral to the city's growth strategy, and is underpinned by the allocation and delivery of the Glan Llyn regeneration site. Strategic Policy SP11 relates solely to The Eastern Sub Area and states that:

*'The Eastern Expansion Area consists of the former Llanwern Steelworks regeneration site known as Glan Llyn H1(47) and EM1(vii), and housing sites at Llanwern Village H1(3), Hartridge High School H1(19) and Jigsaw Site H1(55). This Eastern Expansion Area is identified as a residential led mixed use, sustainable urban expansion area which will provide a range and choice of housing, employment land and community uses.'*

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<sup>1</sup> Included at **Appendix B** is an infographic from the Home Builders Federation's 'The Economic Footprint of UK House Building' Report published in March 2015. The full report is available online at the following link:

[http://www.hbf.co.uk/uploads/media/Economic\\_Fotprint\\_BPF\\_Report\\_March\\_2015\\_WEB.pdf](http://www.hbf.co.uk/uploads/media/Economic_Fotprint_BPF_Report_March_2015_WEB.pdf)

- 2.5. The relevant section of the LDP Proposals Map is attached as **Appendix C**.
- 2.6. As well as supporting wider growth and regeneration ambitions, Glan Llyn also helps NCC deliver its housing requirements in a sustainable way. The site provides 25% of the LDPs overall requirement to 2026 (and the EEA contributes just under 40%). Glan Llyn will also contribute to longer term housing requirements beyond the current plan period.
- 2.7. In terms of its planning history, outline planning permission was granted for a comprehensive scheme across the whole site on 1<sup>st</sup> April 2010 (LPA Ref. 06/0471). The outline permission approves:
- approximately 4,000 new homes
  - the Celtic Business Park (CBP) including new offices, workshops, factories and warehouses
  - a local centre including retail and community facilities
  - 37 acres of play and sports space, including the western park
  - Community facilities including 2 new primary schools
  - A network or green grid of open space including 23 acres of open amenity, parkland and new lakes
  - New accesses from the surrounding road and pathway network
  - Provision of a new park and ride facility
- 2.8. The permission also requires site clearance, treatment and preparation, the provision of new roads, accesses and paths, the installation of new services and infrastructure, the creation of new water bodies and drainage channels, and improvements to the highway network and other ancillary works.

### **Glan Llyn Masterplan and the Western Sub Area**

- 2.9. The outline planning permission for the site is based on a masterplan that shows how the development will be organised. The permission requires the agreement of a series of sub area masterplans and the first – for the western sub area – was approved in 2011. This area extends to about 60 hectares and comprises the first 1,250 new homes split into five main development areas. As its name suggests, the western sub area lies comprises the western part of the site next to the District Centre and close to where the Queen's Way turns into Queensway Meadows before it meets the A48.
- 2.10. A copy of the site wide masterplan is attached as **Appendix D** to this statement. A selection of images from the Western Sub Area Masterplan is **Appendix E**.
- 2.11. Significant progress has been made in the Western Sub Area:
- The site's industrial legacy – its ground conditions, structures and services – has been tackled
  - The first sections of new road (including the site's gateway) have been installed. This heads north into the site from the roundabout on the Queen's Way that has the "Newport Clock" in the middle. The ongoing programme of supporting road infrastructure works has unlocked development land, raised profile and provided a corridor for key services and utilities.

- The development of about 750 homes has been completed, or is underway, approved or in the planning pipeline. This is being delivered by Persimmon Homes, Charles Church, Bellway, St Modwen Homes and local housing associations.
- The first of the two primary schools for the development (to be referred to as 'Glan Llyn West') also forms part of the western sub area. Work on site is due to begin soon and the school is scheduled for opening in September 2018.
- The first parts of Glan Llyn's green and blue grid of open space have been provided, including a large play and sports space, known as 'the western park'

### Local Centre

- 2.12. A separate sub area masterplan has been approved for the local centre which includes a range of retail, leisure, residential and community facilities to serve the wider Glan Llyn community. The local centre is accessed directly from a traffic lit junction on the Queen's Way. The infrastructure has been installed and the first part of the local centre – Marston's Llanwern Bull Pub and Restaurant – opened last year.

### Celtic Business Park

- 2.12 At the eastern end of the site, work on the CBP is underway as well. This area also required its own sub area masterplan which was approved in 2015. The main road access has been approved and installed and the first unit of approximately 50,000 sq ft has been built and occupied. A further two employment units have been approved which will together deliver a further 68,000 sq ft of space. Other parts of the site provide the scope for much larger units and those to the north can also be rail saved. Provision is also made for a 1000 space park and ride linked to a new rail halt (which is to be delivered by others).
- 2.13 A selection of photographs of the site in its current (or relatively recent) state, or which emphasise the transformation that is taking place at Glan Llyn is attached as **Appendix F** to this statement

### 3. Description of the Black Route and Alternatives

#### The Black Route

- 3.1. The process of identifying the preferred route and general approach to the M4 around Newport has been well documented. After detailed consideration of a number of potential routes and following public consultation between September and December 2013, the 'Black Route' was identified as the Welsh Government's preferred route for the new M4. As we understand it, the scheme comprises of the following:
- A new 23km stretch of three lane motorway between Junctions 23 and 29 of the M4 south of Newport.
  - New junctions at Glan Llyn and Docks Way as well as the enhancement of Junctions 23 and 29
  - A new bridge over the River Usk.
  - The reclassification of the existing M4 around Newport to the north to a trunk road or 'A' road.
  - The reconfiguration of Junction 25 of the existing M4.
  - New sections of public rights of way and bridleway.
- 3.2. East of the River Usk and south of the Glan Llyn regeneration site the proposals consist of the following:
- A new junction at Glan Llyn with a link road connecting the junction to a roundabout at the A4810.
  - An overbridge connecting the A4810 at the eastern edge of the site to North Row
  - A new pedestrian and cycle link.
  - An overbridge at Pye Corner
  - A motorway maintenance depot.
- 3.3. As signalled above, the proposal to develop a new M4 (along a new route) has had a well publicised history (which has also been well reported). Last year further analysis was carried out in response to new traffic data and to reflect some changes to the scheme along the black route (and at the second Pre-Inquiry Meeting at the end of January the prospect of further changes to the scheme was also introduced). The key conclusion of the further analysis was reported in a press release in December 2016 from Mr Ken Skates, Secretary for Economy and Infrastructure. In the release he stated that:



*'My review concludes that the proposed M4 Project [namely the scheme along the black route] remains to be considered the long-term, sustainable solution to the long-standing, and worsening, problems associated with one of the key gateways to Wales.'*

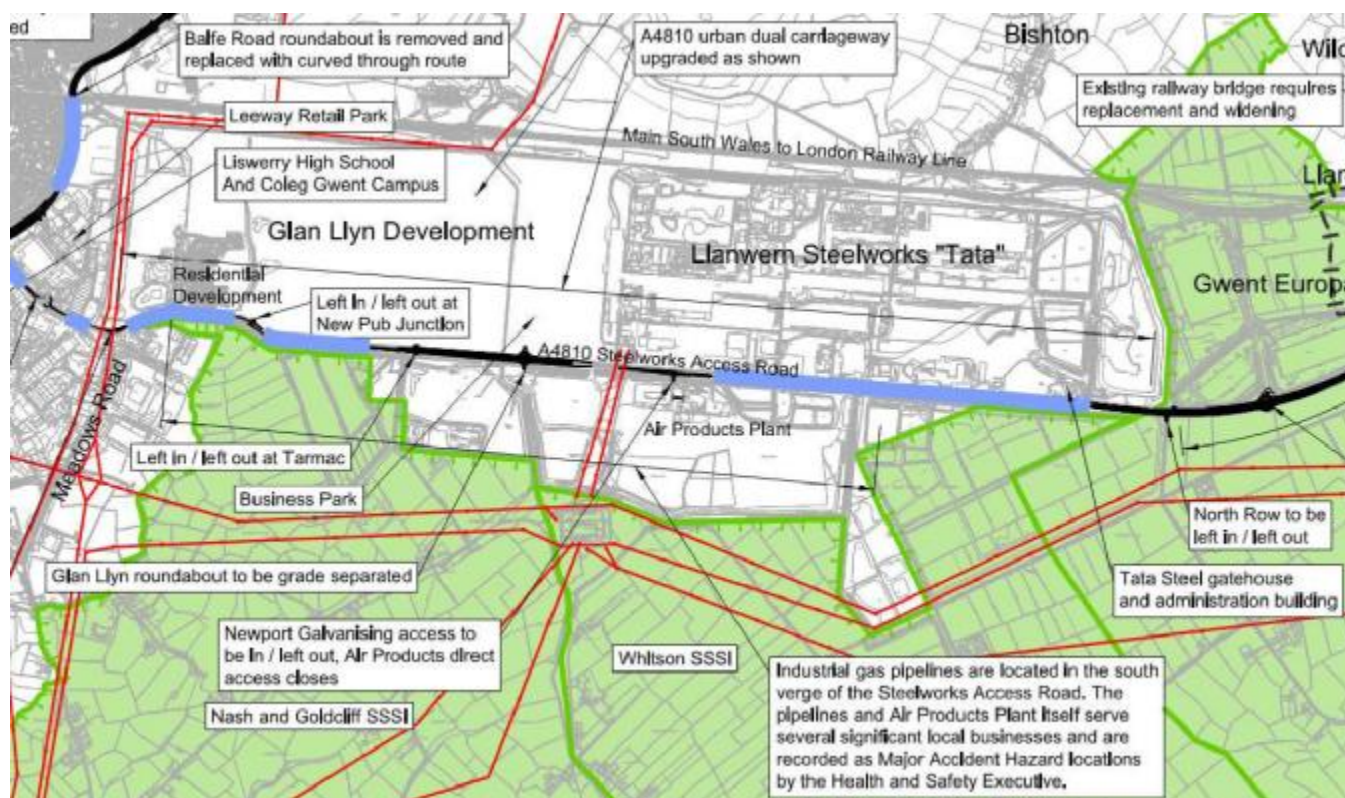
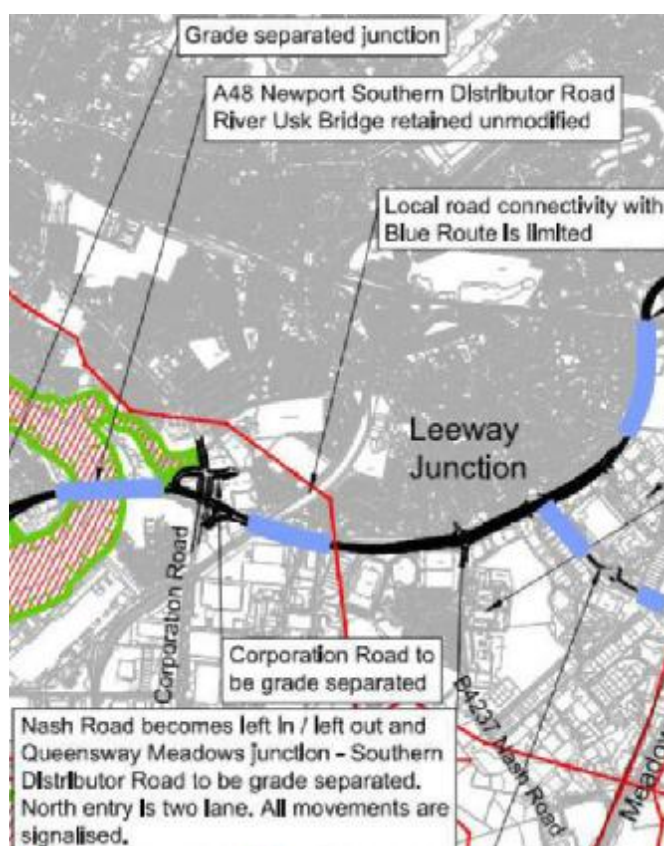
### Alternative Routes

- 3.4. Whilst the Black Route was identified as the Welsh Government's preferred route, alternative routes will be considered by the Inquiry too. As we understand it, the Inquiry cannot approve these alternatives, but it can conclude that they warrant further consideration. A decision on the black route could therefore be delayed whilst that consideration process takes place.
- 3.5. Paragraph 2.16.2 of the Welsh Government's Statement of Case identifies 13 alternative routes before the Inspector as set out below:
- a) Alternative route utilising the existing A48 and A4810, often referred to as the 'Blue route';
  - b) Alternative alignment west of Wilcrick;
  - c) Alternative alignment west of J23A;
  - d) Alternative alignment south of Magor;
  - e) Alternative alignment through ABP North Dock;
  - f) Alternative access to Magor Services;
  - g) Alternative access to Severn Tunnel Junction railway station from J23;
  - h) Alternatives M48/Severn Tunnel Junction railway station connection;
  - i) Alternative access at Junction 23 at Rogiet and Caldicot;
  - j) Alternative junction arrangement at J23a;
  - k) Alternative alignment south at Queensway (to accommodate Industrial Automation);
  - l) Works to Brynglas Tunnels;
  - m) A Magor to Castleton Tunnel.
- 3.6. Given the position, content and sensitivity of the Glan Llyn scheme, SMDLs interest focuses on the Blue Route alternative (which has also been one of the most well publicised).

- 3.7. The Blue Route was submitted as an alternative to Welsh Government as part of public consultation held between September and December 2013. It followed publication of a Paper by Professor Stuart Cole entitled 'The Blue Route: A Cost Effective Solution to Relieving M4 Congestion Around Newport'. Whilst 7 Blue Route Scenarios have been put forward suggesting various levels of alteration to the road network, Scenario 7 is understood to be that supported now by Professor Stuart Cole and preferred by a number of supporters of the Blue Route. It is therefore scenario 7 that is likely to be given most time at the Inquiry (although from the Pre-Inquiry meeting it is understood that a Green Route will also be examined and other alternatives may be presented to the Inquiry shortly after the deadline for the submission of evidence on the 7<sup>th</sup> February).
- 3.8. The Blue Route proposals centre upon improvements to the A4810 and A48, connecting at Junction 28 to the west and Junctions 23A and 24 to the east.
- 3.9. The two main stretches of the Blue Route (Scenario 7) that have the most significant impact on the Glan Llyn scheme are shown on the next page. These have been taken from the Welsh Government's appraisal document *M4 Corridor Around Newport – Appraisal of Objectors' Alternative Blue Route Proposals, December 2016*. We call this the Blue Route Document or BRD from this point forward.
- 3.10. East of the River Usk and south of the Glan Llyn regeneration site the most recently issued proposals consist of the following:
- Variable speed limits between 30mph and 50mph
  - A left in/left out junction at Queensway Meadows McDonalds
  - An eastbound dedicated left lane at Meadows Road
  - A left in/left out junction at the A4810 SAR Junction near the Llanwern Bull
  - A left in/left out junction at Tarmac
  - A grade separated junction at Monk's Ditch roundabout.
  - The retention and modification of eastern arm of the new steelworks entrance roundabout.
  - Left in/left out junctions at North Row.
- 3.11. During its evolution, increasing importance has been given to the sections of the Blue Route that pass near to or by Glan Llyn. Scenarios 6 and 7 changed a general approach of little physical change to the A4810 (the Queen's Way) as it ran alongside Glan Llyn and introduced much more substantial alterations to the junctions on the existing road and its overall condition. These changes appear to have been designed to capture or divert higher levels of traffic from the existing M4 (which was travelling from the east), or retain more traffic along the route (if it was travelling from the west).

# Hearing Statement

## M4 Corridor Around Newport Public Inquiry



- 3.12. The Welsh Government has spent considerable time on assessing the Blue Route and its overall position is documented in the Blue Route Document. The report provides a summary and appraisal of the route and Paragraph 11.1.8 concludes in a very open way that:

*'Whilst it has been demonstrated that the M4 Corridor around Newport Scheme would best address the identified problems and achieve the identified objectives, appraisal has demonstrated that the Blue Route would not address the transport related problems, or sufficiently address the objectives as well as the M4 Corridor around Newport Scheme, although acknowledging that it could offer some positive contributions to some of the objectives.'*

- 3.13. SMDL's position on the Blue Route is set out in Section 5 of this statement.

- 3.14. In terms of any other proposals or alternatives that might arise, paragraph 2.16.6 of the Welsh Government's Statement of Case states that:

*'Any alternatives that are submitted in sufficient detail for consideration at the Public Local Inquiry will be engineered and assessed by the Welsh Government, and included in an Alternatives Brochure, for consultation with those likely to be effected. There will be an opportunity for counter-objections to those promoted alternatives to the Scheme at the Public Local Inquiry.'*

- 3.15. At the time of submission of this Hearing Statement, the Blue Route is the only one of the 13 alternatives to have been engineered and assessed. As signalled already SMDL may wish to make further comments on any other alternative route put forward (or subsequently assessed).

## 4. The Black Route

### Introduction

- 4.1. As noted in Section 3 of this Statement, the Black Route is the Welsh Government's preferred route and it has been subject to a significant amount of technical, environmental, economic and social analysis. The WG's submissions to the Inquiry capture that analysis and explain why the black route is the best way forward.
- 4.2. SMDL's general position on the M4 as it passes by or around Newport, has reflected that of many commentators – namely that there is a clear problem in the area (and with the current motorway network) and something needs to be done about it. We have acknowledged that what that something is, is for others to determine, but given the clear constraints present and the nature of the issues that need to be tackled, any real, lasting or long term solution would need to be substantial and fundamentally new (in terms of the physical infrastructure it was based on).
- 4.3. There is considerable overlap at a high level between SMDLs and WGs positions. We have reviewed the significant amount of evidence contained within the Welsh Government's Statement of Case or the Proofs of Evidence of their consultants. We find no need to repeat what is said (and would also point the Inquiry to the useful summary of the position found in section 2 of the Blue Route Document). We do however, wish to record our basic support for the black route under four main sub headings

### Reduced Traffic

- 4.4. Bryan Whittaker's Proof of Evidence for the Welsh Government focuses on traffic and breaks the impact of the Black Route down into three main categories or benefits. The first is the reduction in the volume of traffic using the Brynglas Tunnels - which act as a major pinch point as the existing M4 goes from three to two lanes north of Newport. The second relates to the reduction in journey times for vehicles travelling between Magor and Castelton as well as for vehicles stopping at Magor Services and accessing Newport Docks. The third benefit centres upon the reduced accident rate. These benefits are substantial and lie at the heart of the M4 project.
- 4.5. On the face of it this could be of limited significance to the Glan Llyn scheme. However it appears that the scheme will be experienced there too. Stephen Bussell's evidence (for the Welsh Government) concludes that the Glan Llyn site will become more accessible:

*'The M4 will afford improved access to the sites. For example, the traffic model suggests that a journey from Glan Llyn (the former Llanwern Steelworks site) to Cardiff would be around 13 minutes quicker in 2037 as a result of the Scheme, whilst a journey from Glan Llyn to Bristol would be around 4 minutes quicker as a result of the Scheme.'*



- 4.6. This is as a result both of the reduced traffic between Castleton and Magor and as a result of a new junction south of the Glan Llyn regeneration scheme. The results may not be critical, but SMDL's interest in the general concept behind the M4, however, broader and sees it as a major strategic initiative that – by improving conditions on the trunk road network - will do a lot more than simply ease congestion around one of its larger sites or improve accessibility to and from it.

### **Economic Benefits**

- 4.7. A similar point can be made about the economic benefits of the Black Route (which are of course significantly linked to the traffic benefits of the scheme).
- 4.8. On one level, the implementation of a solution to a recognised brake on economic performance and growth will trigger a major strategic improvement to economic potential across south Wales. At this level, the reduction in journey time will have significant effect on both access to the labour market and access to employment.
- 4.9. This has a local dimension too and Figures 8 and 9 of Appendix C of Stephen Bussell's Proof of Evidence identify that for the Glan Llyn regeneration scheme there will be an increase of over 8% in terms of both access to employment and access to labour force.
- 4.10. This is particularly important considering the scale of the Glan Llyn scheme (and the wider Eastern Expansion of Newport). Glan Llyn itself is expected to deliver some 4,000 units which will house a new community of 10,000 people. It will also provide 1.5million sqft of B1, B2 and B8 floorspace at Celtic Business Park. The Black Route will both increase the labour market available to firms at Celtic Business Park and decrease the journey time of the work force.

### **Noise and Air Quality**

- 4.11. Peter Ireland's Proof of Evidence provides an overview of the Environmental Statement prepared in March 2016 and touches upon a range of other technical disciplines for which specialist proofs of evidence have been prepared.
- 4.12. Whilst it is not necessary for us to provide a detailed assessment and summary of these reports, it appears that the environmental impacts of the Black Route, unlike its alternatives at this stage, have been thoroughly assessed and appropriate mitigation has been provided to, where possible and appropriate, address concerns.
- 4.13. It is also clear that the Black Route is one that should reduce or improve air quality and noise conditions. This is for the obvious reasons described in the various submissions made on these points (and follows from a general road alignment that dips south of the most well populated areas in Newport). This will reduce traffic along the existing M4 as well as along the A48 and A4810. As a result it will trigger improvements to the air quality and noise levels of a large number of existing residents. This includes residents of Glan Llyn (because of the reduced vehicular movements and the proximity of parts of the completed development to the A4810). The Glan Llyn scheme doesn't rely on this benefit, but the new M4 will assist in maintaining current (or near current) levels of noise and air quality in the face of predicted general increases in traffic.

- 4.14. This last point recognises (or identifies) an overlap between the general and more specific comments we have made in this section. The Black Route will improve conditions for those **currently** living next to the roads that cross Newport. However, because of the location of planned or committed development and regeneration, by doing this it will also improve **future conditions for those not yet living in the City** (but who will live in the planned and committed schemes there). A significant new population is planned for Glan Llyn and they will all enjoy the benefit of the reduced traffic along the City's existing routes. This differentiation between existing and future populations (or existing and future development) is a significant but currently under reported factor in the discussion about the Black Route (or the M4 generally). It is also very important when the implications of the Blue Route are considered (which is the focus of Section 5 of this statement).

### **Reliability, Longevity and Certainty**

- 4.15. The final factor that weighs in favour of the Black Route (to SMDL at least) is the fact that it is the most likely to form a final or lasting solution to the issues and problems that lie behind it. Those issues have been well rehearsed and an approach that sees nothing done about them is not one that is being contemplated by this Inquiry. This has obvious implications for the economic, environmental and societal performance of the Black Route, but means a decision to invest and deliver the Black Route will also help to inform decisions and investment in and around the City (and further along the M4), or have a positive impact on them. The two other options, to dismiss the Black Route, or to delay a decision and pursue an alternative would not do this and the latter could have a significant negative impact on some decisions or on the progress of some initiatives. The reasons for this are explained in the next section of this statement which looks at the implications of the Blue Route.

## 5. The Blue Route

- 5.1. The summary of the Blue Route alternative in Section 3 of this Hearing Statement explains why it is of concern to SMDL. On one level – and according to the evidence presented by the Welsh Government - it will not do what the Black Route will and will not address the basic problems on the network. Others will submit and present (and defend) evidence on this overarching matter, but the mixture of road types and traffic conditions proposed along the Blue Route does indicate that it will not perform in simple traffic movement terms as well as the Black Route.
- 5.2. SMDL's main concern is on another level – which is that the Blue Route itself will have a significant and negative impact on the Glan Llyn project. We recognise this is probably not the intention of the Blue Route's sponsors but it will be the effect of it.
- 5.3. Equally whilst some statements have been made by WG and the Blue Route's supporters that connect the route to Glan Llyn, many of these are at a high level only or ignore some key points or consequences. Understanding these implications of the Blue Route is, however, important for the reasons set out in Section 2 (which describes Glan Llyn and the CBP as a key regeneration scheme and one of the cornerstones of Newport's growth strategy and Local Development Plan).
- 5.4. This section of SMDL's statement aims to capture these implications which fall under four main sub headings:
- a) the increased traffic along the Queen's Way associated with the Blue Route
  - b) noise and air quality effects
  - c) access proposals to Glan Llyn (associated with the blue route and compared with what is proposed and has been approved)
  - d) certainty
- 5.5. For each issue the implications of Scenario 7 of the Blue Route have been used.

### **Traffic Impact of Increased Vehicular Movement on Queensway**

- 5.6. The Blue Route Document reaches the fundamental conclusion that the Blue Route would, when compared to the Black Route, be an inefficient method of relieving traffic on the M4. Paragraph 11.1.1 says that:

*'The Blue Route would not address the identified transport related problems as well as the M4 Corridor around Newport Scheme. It would generally provide better access to Newport than existing, but would only offer little relief to motorway congestion at opening year or in the future. It would relieve less than 10% of traffic on nearly all sections of the existing M4 and would marginally increase the traffic levels on the heaviest trafficked section between Junction 28 and Junction 29.'*



- 5.7. As well as reaching the conclusion that the Blue Route would only offer limited overall relief, the BRD concludes that the A4810, which runs along the length of the southern boundary of the Glan Llyn regeneration scheme, as well as the A48, would experience significantly greater levels of congestion than at present. Paragraph 8.3.4 of the BRD states:

*'The Blue Route would lead to an increase in traffic along the A48 SDR and A4810 to Junction 23A of the existing M4. The Blue Route works would see traffic volumes increase on average by around 42%, although levels are much greater or much lower than that average depending on location.'*

- 5.8. The impact of this increase in traffic along the A4810 is described in Paragraph 11.1.1. as resulting in 'operational problems along some parts of the A48 SDR and A4810', the effects of which would be magnified in the case of accidents and delays.
- 5.9. It is not clear whether the stretch of the A4810 will be one where the increase is higher or lower than the 42% average. However, it is highly likely that the increase associated with the Blue Route will substantially change conditions along it (it has to do this for the Blue Route to perform its claimed function). This change could effect the assumptions made about the network and its ability or capacity to accommodate committed development as well as the anticipated increase and it is not clear whether the growth described in the BRD builds in commitments like Glan Llyn where outline planning permission exists for a new neighbourhood of 4,000 new homes, a local centre, a 1,000 space park and ride and over 1million square feet of business space. Other parts of the Eastern Expansion area would add another 1,100 homes, whilst the whole of the Tata steelworks also falls within the LDP's development boundary – as does a significant area to the south of Queen's Way.
- 5.10. This development is all served by the Queen's Way and would all be affected by the addition of Blue Route traffic (or the capacity on the network in this area the associated function will consume or claim). The route will also presumably have a higher network status with the Blue Route, which will influence future assessments of traffic impact (and make any new trip generating schemes more difficult to approve).
- 5.11. The increase in traffic on the roads (of the magnitude predicted) will also have an impact on the attractiveness of the site to potential residents (and this may transfer to differences in the commercial performance of the scheme).

### Noise and Air Quality

- 5.12. In addition to changing network conditions, the increased traffic along the A4810 will cause changes to environmental conditions along it. Again these consequences – even if unintended – are likely to be significant especially at Glan Llyn where one of the sites long 2km boundaries is formed by the Queen's Way.
- 5.13. The primary impacts are likely to be on noise and air quality. On noise, the Welsh Government states at Paragraph 8.2. of the Blue Route Document that:

*'By contrast [to the black route], properties near the roads which would form the Blue Route would experience a noise increase of approximately 2 to 3 dB. There are approximately 2,000 properties within 200m of the Blue Route that would experience a noise increase both during construction and once the works have been completed. Design measures would need to be explored that may offer some mitigation, for example noise barriers. However it should be noted that these can provide significant visual impacts when situated close to receptors such as residential properties, which would be the case along some lengths of the Blue Route.'*

5.14. It is not clear whether the 2,000 properties referred to are only those which currently exist. That looks likely though as based on the Glan Llyn masterplan, 800 new homes (or 20% of those existing or approved) there would fall within the WG's 200 metre zone. This would increase the WGs blue route figure of impacted properties by 40% on its own.

5.15. In terms of air quality, at Paragraph 8.3.4 of the BRD, the Welsh Government states that:

*'Properties and designated sites within 200m of the Blue Route (approximately 2,000 properties) would experience a deterioration in local air quality both during construction and once the works have been completed as a result of the increase in traffic. Given the measured existing elevated NO<sub>2</sub> concentrations adjacent to the A48 SDR, an increase in traffic would result in a risk of exceeding the annual mean NO<sub>2</sub> objective at properties situated within 100m of the route. GIS indicates there are approximately 575 properties within 100m of the Blue Route, which would be adversely effected.'*

5.16. At paragraph 7.4.2 the WG says that these 575 properties "could be blighted by being situated within 100m of the Blue Route". This impact could be increased as variable speed limits along the A4810 between 30mph and 50mph lead to vehicles speeding up, slowing down and then speeding up again.

5.17. As above it is not clear whether the 2,000 properties referred to include those committed at Glan Llyn or anywhere else (although it appears unlikely). Correcting this would again increase the 2,000 figure by 40%. With respect to the 575 properties within 100 metres, adding the 400 properties in this band at Glan Llyn alongside the Queen's Way would increase the number of properties by almost 70% (with a new total of 975). **Appendix G** to this statement is the site masterplan marked up to show those sections of Glan Llyn within 100m and 200m from the Queen's Way.

5.18. Increases in noise and falling air quality could affect the assessment of the schemes within the 100m and 200m contours and could either see planning approvals being withheld and/or being subject to very stringent controls and mitigation. The BRD refers to the potential impact of any mitigation – and highlights the potential need for fences or screens which could have a significant negative effects on large parts of the scheme before any other measures are considered.

5.19. As well as this primary effect on acceptability, the Blue Route will also have a major effect on the scheme's overall viability and deliverability – with either 10% or 20% of the new housing proposed being subject to very different environmental conditions and different costs. Both will affect marketability and/or the values that can be achieved at the scheme. This is a key concern for SMDL but is one which must be shared by anyone seeking the sustainable growth of Newport and the transformation of one of Wales' largest areas of previously developed land.

### **The Impact of the Proposals on Access to the Glan Llyn regeneration scheme**

- 5.20. The impact of the Blue Route on Glan Llyn is not, however, constrained or limited to noise and air quality (or highway network capacity). As currently proposed it will also change access to Glan Llyn – either in terms of the number of accesses proposed or allowed or the forms that they will take.
- 5.21. The masterplan for Glan Llyn approves four separate accesses for vehicles to and from the Queen's Way:
- a) a roundabout at the western edge of the site (which is known as the Gateway, and which is called the CHQ roundabout in the BRD)
  - b) a traffic lit all movements junction to provide access to and from the local centre
  - c) a third road entrance roundabout to the residential area to the east (which will take the form of a roundabout)
  - d) a separate roundabout access to and from the CBP which will also link the two parts of the Eastern Expansion Area and provide access to the Park and Ride.
- 5.22. These accesses can be seen on the approved masterplan for the site.
- 5.23. Scenario 7 of the blue route retains the CHQ roundabout as it is. It replaces the second access (to the local centre) with a left in left out only. It removes the third completely and turns the fourth into a grade separated junction.
- 5.24. In addition to the noise and air quality effects on residents at Glan Llyn, this revised junction strategy could have a major physical impact on the delivery of the Glan Llyn scheme. It will change the access strategy into and around the site and potentially alter the level of traffic associated with each of the junctions. This could lead to different amounts of development being assessed and declared to be acceptable, and could reduce the amount of development that can be delivered. It could also change the value of development that is achievable (or the costs associated with it). As well as raising clear commercial issues, this would further reduce the site's contribution to the City's growth strategy and its housing land requirements.
- 5.25. There would also be important negative impacts during the constriction phase of the Blue Route. The BRD makes specific reference to the impact of its construction on Glan Llyn. It also concludes that the construction period could be lengthy as to limit impacts on existing traffic, the construction process will need to be phased to ensure that the A48 and A4810 are not closed at the same time.
- 5.26. The construction process is described in Paragraph 4.6.5 of the BRD as having 'a significant adverse impact' upon both the A48 and the A4810. Glan Llyn is highlighted as experiencing impacts that will both interfere with existing residents and construction traffic associated with the development of the scheme's later phases. The BRD also makes the connection between constriction phase impacts and the deliverability of the Local Development Plan, with Paragraph 4.6.5 stating that:

*'This would be contrary to the Local Development Plan and national planning policy, which stresses the importance of housing delivery, especially on brownfield land, as is the case at Glan Llyn.'*

### Uncertainty

- 5.27. SMDL's fourth major concern about the Blue Route is the uncertainty it may create. There are four dimensions to this:
- a) the time it may take for a decision to be made on the principle of what is approved
  - b) the time it may take to confirm the detail of the scheme – the form of the route and the junctions along it
  - c) the time taken to design, assemble necessary land, compensate those affected and then implement the improvements that make up the scheme
  - d) the implication that the scheme could grow or change further in the future
- 5.28. Since the Welsh Government announced in July 2014 that the Black Route was its preferred route, it has been subject to thorough assessment. The Blue Route on the other hand, lacks thorough and detailed assessment with Professor Cole's Report and the Welsh Government's Appraisal being two of very few documents on it. No detailed studies have been carried out (to anywhere near the equivalent state or stage) and there can be no confidence that the Blue Route can accommodate additional traffic (acceptably or otherwise).
- 5.29. This is summarised in Paragraph 10.2.12 of the BRD which states that:
- 'The Blue Route would represent a new line of investigation, with associated unknown risks. As an example, any works to the A48 SDR would require contractual negotiations with the A48 SDR concessionaire. The Blue Route would also need to satisfy relevant statutory processes before construction, which would necessitate significant delay to providing a solution to the existing problems. The programme for the Blue Route would be significantly longer to that of the M4 Corridor around Newport Scheme, due to the requirement to satisfy the required statutory process and associated surveys and assessments, and due to the complexities of upgrading an existing, busy road whilst at the same time keeping traffic flowing'*
- 5.30. Elsewhere the BRD refers to legal agreements between SMDL and Tata and the Welsh Government (at paragraph 3.2.2) which would of course need to be respected. This position together with the potential need for additional land to be assembled to achieve the junctions proposed as part of the Blue Route raise significant procedural and financial issues for the Blue Route (which do not appear to be factored into the assessment of cost and deliverability at this stage).
- 5.31. With respect to the future, the final extent and nature of the Blue Route is not known at this stage. Whilst seven scenarios exist and number 7 is currently preferred, Professor Cole's Report, at Page 1 states that:

*'The land that has been acquired as Steelworks Road is sufficient for widening to a three-lane motorway at a future date if this is needed.'*

- 5.32. If the Blue Route was eventually chosen as the preferred strategy and pursued, it may not be the ultimate form of the road. Scenario 7 could be as far as anyone honestly wants to go at the moment but (perhaps due to its medium term shortcomings), pressure could mount to upgrade the route to a three lane motorway. This would cause even more damage to the Glan Llyn regeneration scheme and means the Blue Route could trigger greater uncertainty on a longer timeframe than the BRD currently anticipates.

## 6. Conclusion

- 6.1. St Modwen Developments Limited (SMDL) is the owner and master developer of the Glan Llyn scheme on the eastern edge of Newport. The scheme will transform the former heavy end of the Llanwern Steelworks into a new community of 4000 homes which will sit in a new green and blue network of environmental space. 2 new primary schools, a local centre and a business park (known as the Celtic Business Park), together with a park and ride and new railway halt are also part of the project.
- 6.2. Outline planning permission has been granted for Glan Llyn and regeneration is underway. The first phases of housing have either been completed, or are under construction or are in the planning pipeline. New physical and green infrastructure has been installed, work on the local centre has commenced and first unit on the business park is built and occupied (with other units approved and about to commence).
- 6.3. Glan Llyn is also part of Newport's Eastern Expansion Area (or EEA) which is one the cornerstones of the City Council's Local Development Plan (or LDP) and the housing it plans for. Once completed the 20 year scheme has the potential to deliver about 6,000 new jobs.
- 6.4. The scale of the project – and its connection to local and wider regional economic fortunes – means that SMDL has expressed consistent support for the new M4 project around Newport. This has always been on the basis that something like the Black Route would be pursued (as this would present the best prospect of successfully tackling the issues behind it). That general support remains – although it focuses on the route and junction strategy to the east of the Usk (and for obvious reasons we have little to say on how the route crosses the Usk and heads westwards to Junction 28).
- 6.5. Whilst progress of the Black Route is important, the progress of one of the alternatives to it (as promoted by others) has potentially greater significance to the Glan Llyn project. This is the Blue Route which broadly speaking looks to send motorway traffic along an improved or upgraded A48 and A4810 between junctions 23a and 28.
- 6.6. It appears to be clear that the Blue Route will fail to deliver the solution to the problems on the trunk road network around Newport.
- 6.7. SMDL's primary concern is, however, with the Blue Route's proposal to use and upgrade the A4810 which is also known as the Queen's Way. The 243 hectare Glan Llyn site is rectangular in shape with shorter sides of about 1 km and longer sides of 2km. Its southern longer edge is formed by the A4810 and this road provides principal access for vehicles to and from the site. The Blue Route runs all the way along this edge. It anticipates a significant increase in traffic along the A4810 and a different access strategy to and from it.
- 6.8. The potential consequences for Glan Llyn of the Blue Route are significant:
- a) the increase in traffic is likely to be substantial. Although no precise figure is known, the Welsh Government expects traffic to increase by an average of 42% (or nearly half as much again) along the Blue Route.

b) at Glan Llyn this has two main consequences. The first is the change in capacity of the road network. This could present a brake on regeneration and limit committed growth at Glan Llyn or increase the tests and costs associated with it. More traffic on the site's local road network would also change conditions for existing residents and their ease of access to the surrounding area

c) the second consequence is that the increased traffic will trigger significant changes to noise and air quality along the route – and therefore along a considerable section of the Glan Llyn site. The WG anticipates that a significant increase in noise and a substantial decrease in air quality would occur – leading to blight within 100metres of the route and a major adverse impact within 200 metres.

d) at Glan Llyn about 400 properties are completed or approved within 100 metres and about 800 within 200 metres. Development of these properties is jeopardised by the blue route either because of immediate effects or because of what happens to costs and values.

e) the Blue Route also proposes a significant change to the access and transportation strategy at Glan Llyn. The approved master plan approves four main at grade junctions – two roundabouts into the residential neighbourhood (to create an overall loop road), one traffic lit into the local centre and one roundabout into the Celtic Business Park.

f) Blue Route proposals show only one access into the residential area, propose a left in left out only for the local centre and show the Business Park access as grade separated.

g) these changes would have further important effects on the Glan Llyn scheme. These are likely to be negative because they would either limit the capacity of the junctions that remain (and the development it would serve), increase costs, change market conditions or eat into the developable area itself.

h) delivering the Blue Route would also take considerable time – mainly because existing roads would need to stay open whilst works were underway.

i) however, even getting to a position where those works could start would also take a lot of time. Substantial design work is required to confirm if the Blue Route could actually be acceptably delivered (in principle) and only then could work begin on the approval process and the assembly of the necessary land (and the agreement and payment of any compensation, which could be substantial, but is currently unknown)

j) added to this current uncertainty is the potential longer term growth of the Blue Route. The potential of increase the A4810 to a six lane highway has been raised in documents from the Blue Route's sponsors. Whilst this would do nothing to counter the real bottlenecks along the route, it cannot be ruled out (especially given the number of scenarios the current Blue Route has gone through already).

6.9. In this light SMDL makes two main recommendations to the Inquiry:

1. The first is to maintain its position that the Black Route (or something genuinely new like it) is approved as the long term and lasting solution to traffic conditions around Newport.
2. The second is to continue to resist the Blue Route (or any other alternative which proposes significant increases along Queens' Way or traffic conditions and accessibility along it). This is for the clear reasons set out above about its impact on the Glan Llyn scheme or the uncertainty it would introduce. The Blue Route places serious and unnecessary obstacles in the way of the continued delivery of this major regeneration scheme and should not be pursued.



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## Appendices

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# Hearing Statement

M4 Corridor Around Newport Public Inquiry

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## Appendix A

### Approximate Site Location on Aerial Photograph

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## Appendix B

### Value of Housebuilding Infographic

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# LAST YEAR THE UK HOUSE BUILDING INDUSTRY BUILT AROUND 140,000 NEW HOMES. ITS ECONOMIC FOOTPRINT WAS SIGNIFICANT

## Investment



**£12.5bn**  
invested in land and  
buildings for homes



**£5.5bn**  
spent on suppliers  
[90% stays in the UK]

## Jobs and Growth



**£19.2bn**  
**of Economic Output**  
based on the last quarter of  
construction sector orders

**More than  
600,000 jobs**

233,000 directly employed in the industry  
(18% of the construction industry)



**4.3 jobs for every  
home built**

**3,700 apprentices,  
400 graduates and  
500 other trainees**

each year, excluding those in  
contractors and suppliers

## Resources for Public Services



**£1.4bn**  
**of tax paid**  
Stamp Duty Land Tax, Corporation Tax,  
NI, PAYE, and Residents' Council Tax



**£3.1bn**  
**of new 'affordable housing'**  
38% of all new homes built in the UK  
are 'affordable'



**£576m** for infrastructure  
including £225m on new and improved schools

## Stronger Local Communities and Environment



**6.5m** trees and shrubs  
planted or retained



**£131m** invested in  
open space, community,  
sport and leisure facilities



**80%** of construction  
waste recycled

**£3.8bn** spent in local shops and  
services by residents of new homes  
Another £705m is spent to make each house "feel like home"



The UK should increase annual supply of homes by at least 100,000. Achieving this would mean:

**£1.1bn**  
more net capital  
expenditure

**£13.6bn**  
Increase in  
economic  
output

**430,000**  
extra jobs

**£1.2bn**  
more tax paid

**£432m**  
extra investment in  
local infrastructure

**£3.2bn**  
resident spending  
on goods and  
services

These extra benefits would be additional to the economic footprint of the current supply of 140,000 new homes.

# Hearing Statement

M4 Corridor Around Newport Public Inquiry

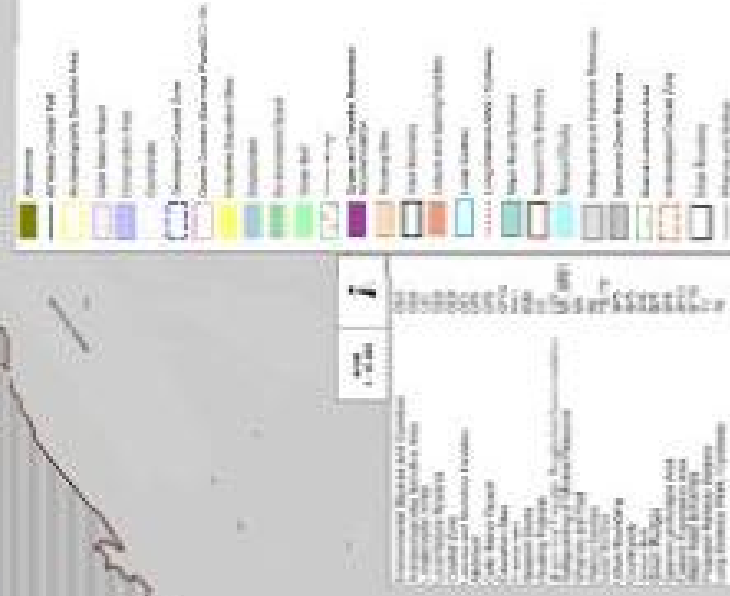
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## Appendix C Newport LDP Proposals Map

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# Hearing Statement

M4 Corridor Around Newport Public Inquiry

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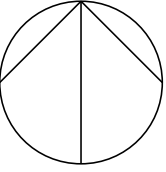


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## Appendix D Indicative Masterplan

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**Notes:**  
Residential areas quoted are approximate gross site areas and include Leaps, Laps and on plot road infrastructure

Project: Glan Llyn, Newport

Title: Indicative Master Plan

Drawn by: IY  
Date: Sept 2005  
Scale: 1:5000 @ A1  
Project no.: 8111  
Cad Reference: 8111A011  
Feasibility no.:  
Drawing no.: A011  
Revision: AC

# Glan Llyn - Indicative Master Plan

8111A011

STEPHEN GEORGE & PARTNERS

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# Hearing Statement

M4 Corridor Around Newport Public Inquiry

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## Appendix E Western Sub Area Masterplan

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5.2 WESTERN SUB-AREA MASTER PLAN



# Hearing Statement

M4 Corridor Around Newport Public Inquiry

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## Appendix F Site Photographs

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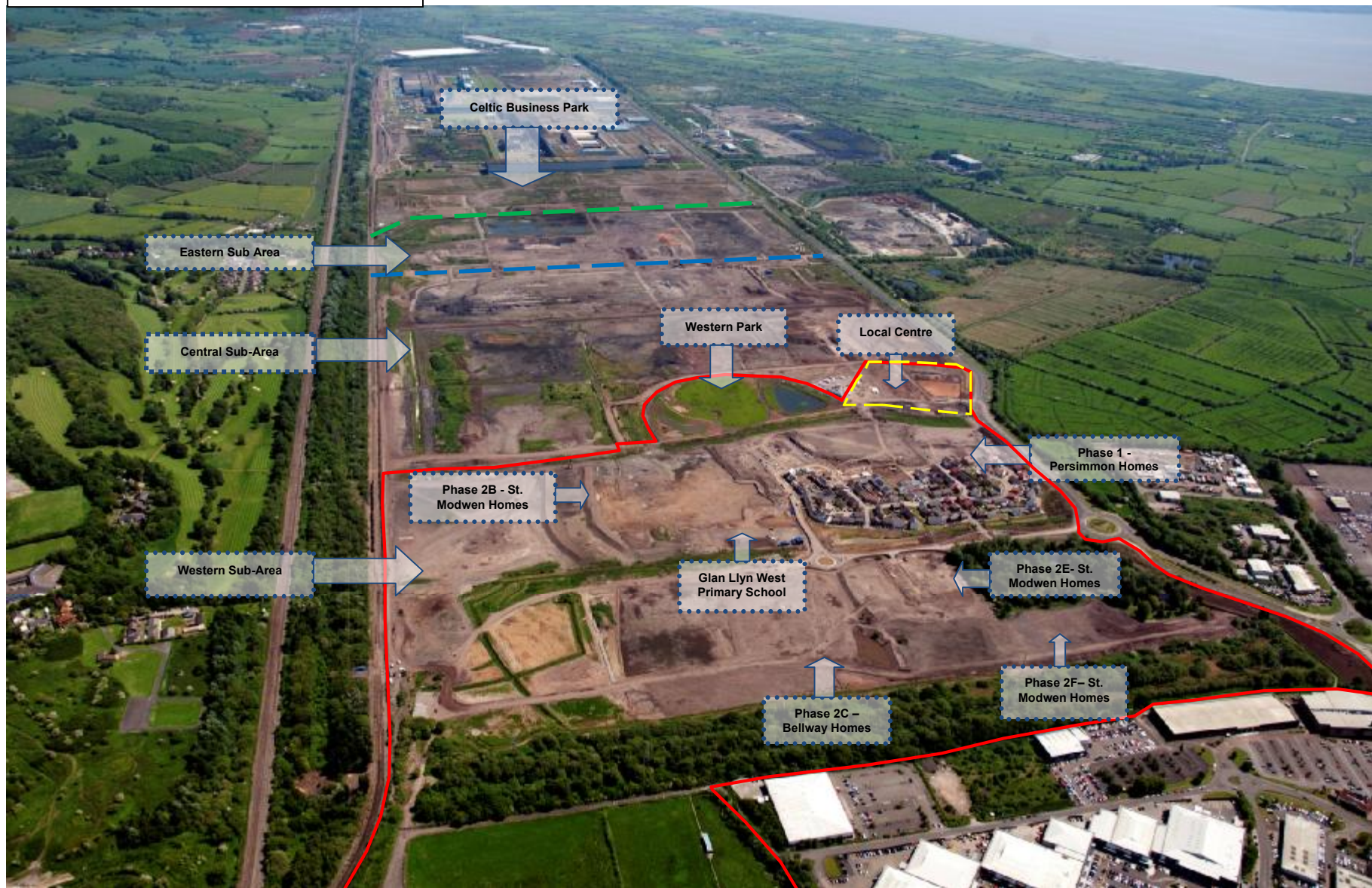
## The site

Figure 1: The former TATA steelworks site following clearance





**Figure 2: Regeneration proposals**





**Figure 3:** St. Modwen Homes (phases 2e and 2f) and Persimmon Homes (phase 1)





**Figure 4:** St. Modwen Homes (phases 2e and 2f), main access roundabout and the Gateway





**Figure 5:** Persimmon Homes (phase 1), access roundabout and Queensway





**Figure 6:** Progress so far and future development phases





**Figure 7:** Future development phases being prepared for development





**Figure 8:** Extent of Glan Llyn site and development progress





**Figure 9:** Western Park





**Figure 10:** Western Park and development progress (including the local centre)





**Figure 11:** Unit 1 Celtic Business Park





**Figure 12:** Future development phases on Celtic Business Park



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### Appendix G

### Masterplan Showing 100m and 200m Contours from

### Queen's Way

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Notes:  
Residential areas quoted are  
approximate gross site areas and  
include Leaps, Laps and on plot road  
infrastructure



Project: Glan Llyn, Newport  
Title: Indicative Master Plan  
Drawn by: TY  
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