

7. SOCIO-ECONOMIC IMPACTS

For the applicant; WBerksC; WokBC; RBC; RBWM; BFC; BCC; SBDC; SBC; LBHill; LBHous; GLA; RAC; AA; FOE.

SEI7.1 Does the scheme comply with the need to be designed to minimise social and environmental impacts and improve quality of life in accordance with para 3.2 of the NNNPS?

1. Paragraph 3.2 of the National Networks National Policy Statement (“NN NPS”) states that *“the Government recognises that for development of the national road and rail networks to be sustainable these should be designed to minimise social and environmental impacts and improve quality of life.”*
2. Due to the inter-related nature of the impacts, social and environmental impacts have been considered by topic area. This will enable a clearer picture of how quality of life might be improved (or otherwise affected) as a result of the Scheme, as well as how individual impacts have been mitigated or minimised. Further information relating to mitigation of construction nuisance can be found within Sections 6.2 and 6.3 of the Outline Construction Environmental Management Plan (Appendix 4.2A of the ES) (Application Document Reference 6.3). Paragraph 5.2.10 of the Socio-Economic Report (Application Document Reference 7.2) highlights that *“the effect of the operation of the Scheme on community and private assets in general is considered to be beneficial overall. The operation of the Scheme would relieve congestion and smooth the flow of traffic along the M4. It can therefore be expected for there to be improvements in the road network relied upon by local businesses and residents.”* Therefore, it can be considered that the Scheme could contribute to an improvement in quality of life in compliance with the NN NPS. Further detail is provided by topic area below.

Land-take

3. Temporary land-take required for the Scheme could have both a social and environmental impact. Land-take will be required from community assets as well as residential, commercial and agricultural assets. Details and land areas to be utilised during the construction period are provided in Tables 6.1, 6.2, 6.3, 6.4, 6.6, 6.8, 6.10, 6.12, and 6.14 of the Socio-Economic Report (Application Document Reference 7.2) . However, this impact would be temporary, thereby minimising the impact. Some permanent land-take will be required from community assets between the following links:
 - 3.1 junctions 11 to 10 (common land, whereby a replacement will be provided) (Table 6.2 of the Socio-Economic Report) (Application Document Reference 7.2); and
 - 3.2 junctions 7 to 6 (green space north of the Jubilee River) (Table 6.6 of the Socio-Economic Report) (Application Document Reference 7.2).
4. The Scheme seeks to retain existing green, open and natural spaces, and has been developed to minimise land-take (both permanent and temporary) where possible. Where land-take has been necessary, for example as described in paragraph 14.10.7 of the ES (Application Document Reference 6.1) in relation to allotment plots directly affected by the construction works between junctions 6 and 5, a worst case scenario has been described and assessed. Where possible, the number of people potentially affected by land-take has been minimised, thereby reducing the social and environmental impact.

5. Further, where common land, which forms part of the carriageway of the M4 motorway, is being acquired as part of the Scheme, replacement common land is being provided at plot 10-01c (shown on the replacement land plan submitted with the DCO Application (Application Document Reference 4.1). This represents a benefit of the Scheme as it provides additional common land to replace common land that is not capable of being used currently.

Accessibility

6. During construction, community severance issues could reduce accessibility to a range of community assets. In developing the Scheme, the most appropriate construction methodology for the required improvements to structures, such as overbridges and underbridges, has been selected based on the particular circumstances applying in relation to each structure. Potential social impacts have been minimised by considering the availability of diversion routes, and the existence of sensitive receptors in the vicinity of the structure.
7. Community severance issues are identified in the Socio-Economic Report (Application Document Reference 7.2) at:
 - 7.1 junctions 8/9 to 7 (paragraphs 6.6.11 to 6.6.21);
 - 7.2 junctions 7 to 6 (paragraphs 6.7.10 to 6.7.15); and
 - 7.3 junctions 6 to 5 (6.8.9 to 6.8.21).
8. Within these sections of the M4, overbridges are to be re-built. However, in most cases, offline options have been chosen in order to minimise potential severance issues and avoid travel delay. Appropriate diversion routes, signage and information will also be provided, further minimising this social impact. Where appropriate diversion measures for all travellers have not been identified, an alternative solution is identified. This relates to minimising the timing of closures between junctions 8/9 and 7 (paragraph 5.6.3 of the Socio-Economic Report) (Application Document Reference 7.2).
9. Between junctions 5 and 4b, Old Slade Lane Overbridge will be rebuilt on-line, which will necessitate the closure of both the road and bridleway. Appropriate information and diversion measures would be provided (see paragraph 5.9.1 of the Socio-Economic Report) (Application Document Reference 7.2). Between junctions 4b and 4, paragraphs 6.10.6 to 6.10.7 of the Socio-Economic Report highlight potential community severance issues from the lengthening of a subway. This may affect pedestrians travelling north/south to community facilities, employment areas and homes. A diversion would be put in place, which would minimise the significance of the impact. Paragraph 5.8.4 of the Socio-Economic Report (Application Document Reference 7.2) states that the Langley subway widening works will require closure and diversion of the pedestrian/cyclist route for the majority of the works' duration. A diversion route is planned to run beneath either the east or west main underbridge, dependent on the works programme.

Landscape and Light Pollution

10. Chapter 8 of the ES (Application Document Reference 6.1) refers to the Environmental Masterplan (Annex A1 to the Engineering and Design Report (Application Document Reference 7.4)), which provides information relating to on-going mitigation in relation to landscape and visual amenity. The implications of the Scheme (including proposed road lighting, and illuminated signs and gantries) for night-time characteristics has been assessed. A neutral significance of effect is anticipated as a result of the Scheme, principally because

road lighting will be retained at its current locations and no new road lighting will be introduced (see paragraph 8.2.11 of the ES) (Application Document Reference 6.1). In addition, where road lighting is required, existing lighting will be removed and replaced with modern light emitting diode (“LED”) lighting, with a central management control system (see paragraph 6.3.44 of the Engineering and Design Report) (Application Document Reference 7.3). It is therefore considered that the broad night-time landscape characteristics, i.e. the baseline Environmental Zones identified within each section, will not be affected by the Scheme, thereby minimising social and environmental impacts.

11. Furthermore, paragraph 5.6.7 of the Outline Construction Environmental Management Plan (Appendix 4.2A of the ES) (Application Document Reference 6.3) outlines that lighting will be designed, positioned and directed so as not to intrude unnecessarily on adjacent buildings, ecological receptors, structures used by protected species and other land uses to prevent unnecessary disturbance or interference with local residents, railway operations, or passing motorists. The requirements of the Construction Environmental Management Plan are secured under Requirement 8 at Schedule 2 of the Draft DCO (Application Document Reference 3.1). It should be noted that the Scheme will have the ability to switch off and dim lights if required, further enhancing the ability to respond to lighting impacts. The lighting provision will apply particularly to sites where night working will be required. In addition, at construction sites where potentially significant impacts are identified, the contractor will develop and implement lighting controls as part of their Environmental Management System.

Ecology

12. Chapter 9 of the ES (Application Document Reference 6.1) demonstrates the approach the Scheme has taken to avoid and mitigate impacts on ecology and nature conservation. Where possible, habitats will be restored after construction works have finished, and biodiversity will be taken into account during landscaping, including the use of wildflowers and native and fruit-bearing species which will provide benefits to wildlife in general (paragraph 9.16.4).

Air Quality

13. Paragraph 6.6.8 of the ES (Application Document Reference 6.1) highlights potential adverse impacts from construction dust emissions at sensitive receptors close to the Scheme route during construction works. Paragraphs 6.5.6, 6.7.6, 6.8.6, 6.9.6, 6.10.6, 6.11.6, 6.12.6, and 6.13.6 of the ES highlight that amenity impacts (including dust) will be minimised through the preparation and implementation of a Construction Environmental Management Plan, and thus secured by Requirement 8 at Schedule 2 of the Draft DCO (Application Document Reference 3.1). Mitigation measures are presented in Appendix 6.1 of the ES (Application Document Reference 6.3). Mitigation should reduce air quality impacts on social and environmental receptors during construction.
14. Paragraph 6.14.24 of the ES (Application Document Reference 6.1) states that, whilst adverse, the operational effects of the Scheme on air quality are not considered to be significant overall, therefore no mitigation is recommended during the operational phase. Therefore, it is considered that, social and environmental impacts from air quality would be minimal.

Noise and Vibration

15. For the mainline works (see paragraph 12.4.38 of the ES (Application Document Reference 6.1) for defined construction activities), phasing will be such that the section between junctions 12 to 8/9 should be completed by early 2018, as per paragraph 8.3.7 of the

Engineering and Design Report (Application Document Reference 7.3), thus residents within this section will experience minimal disturbance after this time. Similarly, people living between junctions 8/9 and 3 may experience only minimal disturbance until early 2019. Activities are all dynamic in nature, as the works move along the Scheme, and the worst case noise levels will prevail for only a short period of time (paragraph 12.4.50 of the ES). This will minimise the significance of the social and environmental impacts during construction. Impacts from construction compounds will also be minimised through optimising site layout. Noise bunding and/or barriers will further minimise the impact from noise on social and environmental receptors (paragraph 12.4.87 of the ES). A range of good site practices will be adopted in order to mitigate construction phase noise and vibration, and are described in paragraph 12.4.27 of the Outline Construction Environmental Management Plan (Appendix 4.2A of the ES) (Application Document Reference 6.3) and thus will be secured by Requirement 8 at Schedule 2 of the Draft DCO (Application Document Reference 3.1). Such measures, and other good site practice mitigation techniques, will include:

- 15.1 Selection of quiet and low vibration equipment;
 - 15.2 Review of construction programme and methodology to consider low noise/low vibration methods (including non-vibratory compaction plant and low vibration piling methods, where required);
 - 15.3 Optimal location of equipment on site to minimise noise disturbance;
 - 15.4 The provision of acoustic enclosures to static plant, where necessary;
 - 15.5 Use of less intrusive alarms, such as broadband vehicle reversing warnings;
 - 15.6 Local screening of equipment and employment of perimeter hoarding; and
 - 15.7 Where existing noise barriers are removed during the construction works, replacement with temporary noise barriers.
16. Paragraph 12.11.10 of the ES (Application Document Reference 6.1) identifies a small number of receptor locations along the route of the Scheme which may experience noise increases and appropriate mitigation has been identified. During operation, additional noise barriers will be incorporated between junctions 5 and 4b. Low-noise surfacing has been incorporated across all lanes of the Scheme along the Scheme extent (paragraph 12.11.11 of the ES) during operation. The relevant local authorities and affected residents will be kept informed of the works to be carried out, and of any proposed work outside normal hours. Residents will be provided with a point of contact for any queries or complaints (paragraph 12.4.27 of the ES). This could help to minimise stress levels and improve quality of life during the construction works.
17. Compared to a Do Minimum scenario, the residual operational noise effects of the Scheme are predicted to be negligible or beneficial (paragraph 12.4.110 of the ES) (Application Document Reference 6.1), demonstrating that quality of life may be improved as a result of the Scheme. An enhanced noise mitigation strategy (to provide further long term benefits to residential areas along the Scheme) is provided in Appendix 12.5 of the ES (Application Document Reference 6.3).

Soil and Water Pollution

18. Construction works will occur near to and within watercourses, abstraction points and surface water features and will also involve works to the drainage network. The majority of predicted residual effects within Chapter 10 of the ES (Application Document Reference 6.1) are neutral or slight adverse following the minimisation of impacts through mitigation measures, with the exception of the former landfills below offline link roads (junctions 5 to 6; 6 to 7; and 7 to 8/9). During operation, where it is necessary to safeguard highway users and the wider environment, long-term monitoring of settlement and leachate/gas regimes within disturbed areas of landfill will be implemented (paragraph 10.5.8 of the ES), thereby minimising any potential negative impacts on the local population and environment. Such areas will be identified during the detailed design stage of the Scheme and will be included in the Construction Environmental Management Plan and thus the monitoring will be secured by Requirement 8 at Schedule 2 of the Draft DCO (Application Document Reference 3.1).
19. The details of certain construction operations, such as piling, excavation of soft ground below newly widened embankments and excavation below the water table all have potential to cause migration of contaminants (suspended solids and chemical contaminants from landfill materials) which may affect groundwater quality and in particular affect public water drinking supplies, which could have social and environmental impacts, and thus will be considered further during the detailed design phase (paragraph 10.5.4 of the ES) (Application Document Reference 6.1). Appropriate measures will reduce/mitigate any effect where such operations are not able to be eliminated (paragraph 10.5.4 of the ES) (Application Document Reference 6.1). Chapter 10 of the ES outlines that mitigation of the effects on soils both within and outside the highway boundary, which relates mainly to the spread of pollution, will be achieved through appropriate control measures which will be administered through the Construction Environmental Management Plan (and thus secured by Requirement 8 at Schedule 2 of the Draft DCO (Application Document Reference 3.1)) and will be incorporated into the construction phase of the Scheme.
20. Chapter 15 of the ES (Application Document Reference 6.1) provides a summary of the predicted impacts on road drainage and the water environment and includes measures that will augment existing pollution control measures. Environmental impacts could occur on the local water resources and associated infrastructure from plant and access to the works. Appropriate control measures will be secured through the Construction Environmental Management Plan under Requirement 8 at Schedule 2 of the Draft DCO (Application Document Reference 3.1). Regular maintenance of highway drainage infrastructure, in accordance with industry best practice requirements and guidance, will ensure that contaminants that might be released accidentally onto the operational highway would not significantly impact adjacent geology and soils or surface and groundwater regimes (Table 15.15 of the ES) (Application Document Reference 6.1). Pollution control measures would include active systems (requiring operators) comprising penstocks, valves and notched weirs. Passive systems would comprise swales, ponds, wetlands, ditches, basins, silt traps, filter drains, soakaways and oil separators (referred to in paragraph 15.2.4 of the ES (Application Document Reference 6.1)). The current drainage network within and serving the M4 is designed for a 1 in 2 year storm event and has not been designed with an allowance for climate change. For the existing M4, improving the existing drainage system and implementing a routine maintenance plan will have benefits and will be designed for a 1 in 5 year storm event, with a 20% allowance for climate change, which will enhance flood attenuation (referred to in paragraph 15.2.4 of the ES (Application Document Reference 6.1)).
21. To ensure the quality of the water environment does not deteriorate during construction, a Construction Environmental Management Plan will document all construction phase mitigation measures. The requirements of the Construction Environmental Management Plan will be secured by Requirement 8 at Schedule 2 of the Draft DCO (Application Document

Reference 3.1). An Emergency Flood Response Plan is required by the Construction Environmental Management Plan. Mitigation measures proposed should minimise predicted social and environmental impacts during construction in compliance with the NN NPS. Paragraph 15.4.60 of the ES (Application Document Reference 6.1) notes that the risk of fluvial flooding to or from the Scheme during operation will not increase more than the existing situation as a result of widening works. The drainage plans available at this stage of the Scheme's design (contained within the Drainage Strategy Report (Application Document Reference 7.5)) indicate that there are no identifiable risks to the water environment from the operation of the Scheme.

Community Safety and Stress

22. Traffic management measures associated with construction of the Scheme, including the use of narrow lanes and reduced lane speeds, may lead to temporary increases in journey times and congestion, which may in turn have a negative effect on all travellers from increased levels of stress. More detailed information can be found in Chapter 13 of the ES (Application Document Reference 6.1). Paragraph 4.1.1 of the Outline Construction Environmental Management Plan (Appendix 4.2A of the ES) (Application Document Reference 6.3) requires a community engagement strategy to be prepared for the Scheme which will include a programme of high quality, effective and sustained communication with communities and stakeholders, setting out areas affected by construction works and information regarding planned construction works. This, along with the temporary nature of the impacts, may reduce some aspects of stress.
23. Paragraph 5.6.7 of the Outline Construction Environmental Management Plan (Appendix 4.2A of the ES) (Application Document Reference 6.3) also includes that site lighting and signage will be provided by the Contractor to enable the safety and security of the construction sites, thereby reducing potential social impacts. Paragraph 5.6.8 of the Outline Construction Environmental Management Plan (Appendix 4.2A of the ES) (Application Document Reference 6.3) states that, where appropriate, lighting to site boundaries will be provided and illumination will be sufficient to provide a safe route for the passing public and that motion sensor lighting will be used where appropriate to prevent unnecessary usage, minimising environmental impacts. The requirements of the Construction Environmental Management Plan will be secured by Requirement 8 at Schedule 2 of the Draft DCO (Application Document Reference 3.1).
24. Paragraph 13.8.12 of the ES (Application Document Reference 6.1) identifies beneficial effects of the Scheme in relation to factors such as road safety and reduction of general congestion. Journey time reliability will improve as a result of the introduction of the Scheme. In addition to the benefits associated with the introduction of a smart motorway, following consultation it has been decided to resurface all lanes with a Thin Surface Course System, otherwise known as "low noise" surfacing, along the complete Scheme extent (paragraph 13.8.13 of the ES). With this mitigation in place, in addition to the predicted negligible changes or decreases in noise levels within the Scheme corridor with the Scheme in operation, the surfacing will reduce tyre noise and consequently in-vehicle noise levels, which will have a beneficial impact on driver stress (paragraph 13.8.13 of the ES). This could lead to improvements in quality of life, in compliance with the NN NPS.
25. Furthermore, in compliance with the need to improve quality of life in accordance with the NN NPS, an important objective of the Scheme is to continue to deliver a high level of safety performance of the network using smart motorway techniques. The WebTAG Appraisal Summary Table (Appendix 1 of the Socio-Economic Report) (Application Document Reference 7.2) produced for the Scheme indicates that as a consequence of implementing the

Scheme, there is likely to be a decrease of 33 fatal, 303 serious and 1,622 slight injury accidents across the modelled timeframe (60 year). This demonstrates that the Scheme could have a positive impact, potentially reducing the casualties within the study area.

26. Driver information will improve considerably as a result of the introduction of the Scheme - gantries with lane-specific Variable Message Signs ("VMS") being a key feature of smart motorways (paragraph 6.1.1 of the Engineering and Design Report (Application Document Reference 7.3)). The reduction of general congestion and the likelihood of 'traffic flow breakdown' are other key outcomes that have been identified from studies following the introduction of a smart motorway. Each of these factors is considered to be able to reduce driver stress (as noted in paragraph 13.8.16 of the ES (Application Document Reference 6.1)) and improve quality of life in compliance with the requirements of the NN NPS.

Access to Work and Training

27. Paragraph 14.4.13 of the ES (Application Document Reference 6.1) notes that the Scheme provides an opportunity to develop good practice in terms of use of a proportion of the workforce from local communities, development of skills and training programmes, and apprenticeship schemes. The Socio-Economic Report (Application Document Reference 7.2) highlights that the construction phase of the Scheme is likely to have a positive impact on employment in the sub-region. Construction of the Scheme is estimated to create in the region of 400 temporary full time employment jobs, equating to some 2,000 person years of employment over a five year period (paragraph 6.2.1).
28. Paragraph 6.2.7 of the Socio-Economic Report (Application Document Reference 7.2) identifies that traffic congestion is a possible constraint to the further economic development of the sub-region, affecting not only travel to work journeys, but also the attractiveness of the wider area as a place to live and visit. The operation of the Scheme is anticipated to relieve congestion and smooth the flow of traffic along the M4. Therefore, it can be expected for there to be improvements in the road network relied upon by local businesses and residents. Paragraph 14.4.19 of the ES (Application Document Reference 6.1) summarises the findings of the Regeneration Report produced for the Scheme (a copy of which is provided at Appendix A of this response), which notes that the Scheme passes within close proximity to five regeneration areas, namely Reading, Wokingham, Bracknell, Maidenhead and Slough. The overall conclusion of the analysis is that the Scheme does have a slight beneficial impact on travel times in relation to regeneration areas which are close to the Scheme.
29. It is also considered that the Scheme could lead to an increase in potential employment opportunities. This is through improvements to the road network, which is relied upon by local businesses and residents, and the associated beneficial effect of the Scheme on the future economic growth of the sub-region (as described in paragraph 6.2.13 of the Socio-Economic Report (Application Document Reference 7.2)).

Minimising the Use of Resources

30. Table 11.11 of the ES (Application Document Reference 6.1) highlights that the design approach has been and will be carried out to minimise the amount of the excavated materials exported offsite, thereby minimise environmental impacts. The production of a Materials section within the Construction Environmental Management Plan (secured by Requirement 8 at Schedule 2 of the Draft DCO) (Application Document Reference 3.1), a Material Management Plan and a Logistics Plan (Annexes B and C of the Outline Construction Environmental Management Plan (Appendix 4.2A of the ES (Application Document Reference 6.3)) will support the contractor in identifying and maximising opportunities for

the reuse of materials onsite as the Scheme progresses. Throughout the design process, “designing out waste” principles have been considered in order to minimise the quantity of material resources required for the Scheme. One objective of the Materials Management Plan, as stated in paragraph 11.2.36 of the ES, will be to ensure that material resources and waste arisings are handled and used in a manner which prevents harm to human health and pollution of the environment. The Materials Management Plan will be based on an appropriate risk assessment that underpins the Scheme design and any need for remediation.

31. Paragraph 11.4.68 of the ES (Application Document Reference 6.1) states that the Scheme will, where possible, maximise the reuse of site-won materials and procure materials with a high percentage of recycled content. However, the magnitude of impact of the embodied carbon contained within the main material resources to be used on the Scheme is assessed as significant. Through the maximising of the amount of material resources and waste to be reused onsite, the overall demand for materials from offsite sources could be reduced, thereby minimising the potential environmental impact.
32. Section 10.5 of the ES (Application Document Reference 6.1) summarises mitigation measures including at offline side roads, where earthworks retaining solutions have been included within the design of the Scheme in order to minimise the footprint of the works and hence reduce any effects on soils at these locations. Areas of land falling within the footprint of new earthworks may be stripped of potentially valuable topsoil which may be reused within the Scheme or, where surplus to requirements, potentially offered for beneficial reuse offsite in the surrounding area. Topsoil existing at temporary construction compound locations would be stripped and stockpiled for later reinstatement following the decommissioning and removal of the construction compounds (paragraph 10.5.3 of the ES).

Cultural Heritage

33. Potential impacts on cultural heritage assets are discussed in Chapter 7 of the ES (Application Document Reference 6.1). Paragraph 7.5.14 of the ES states that mitigation measures to reduce impacts include the introduction of an archaeological watching brief in areas where unknown archaeological remains may be present. This will be applicable across the entirety of the Scheme (Table 7.3 of the ES), thereby minimising any potential negative impacts. Paragraph 7.8.15 of the ES notes that between junctions 8/9 and 7, due to the presence of a nearby scheduled monument, mitigation would take the forms of a geophysical survey and archaeological trenching in accordance with a Written Scheme of Investigation, to better understand the nature and extent of the remains (secured by Requirement 16 at Schedule 2 of the Draft DCO) (Application Document Reference 3.1).

SEI7.2 Appendix B to the Socio-economic Report APP-090 sets out the applicant's WebTAG appraisal of the scheme. To what extent are the summaries of key economic and social impacts agreed? Can evidence be produced to support any disagreement with the conclusions set out in App B?

1. The Socio-Economic Report ("SER") (Application Document Reference 7.2) provides an overview of the assessment of the Scheme. In particular, Section 6 of the SER comprises an assessment of the residual construction and operational effects of the Scheme as a whole and on a link by link basis. The results of the individual components of the appraisal are drawn together in the Appraisal Summary Table ("AST") at Appendix B of the SER.
2. The reports have all been subject to the governance process embedded in Highways England's Project Control Framework ("PCF"), together with appropriate level scrutiny by the Department for Transport ("DfT") and the Office of Government Commerce ("OGC"), which was established to support public sector organisations to improve value for money for the taxpayer.
3. Each of the entries in the AST has been derived through application of the respective topic guidance within WebTAG. Where it is feasible to monetise the impacts, the principles set down in TAG Unit A1.1 (cost-benefit analysis) have been applied. The AST together with its supporting worksheets has been subject to scrutiny by the Transport Appraisal and Strategic Modelling ("TASM") and Roads Economics team of the DfT to ensure TAG guidance has been correctly followed and applied. The entries in the AST, and the topic guidance on which they have been derived, are as follows:
 - 3.1 Journey time and reliability have been assessed in line with TAG Unit 1.3 (user and provider impacts);
 - 3.2 Regeneration impacts have been assessed using TAG Unit A2.2;
 - 3.3 Environmental impacts have been assessed in accordance with the principles set down in TAG Unit A3, as applied to highway schemes in DMRB and described in the respective chapters of the Environmental Statement (Application Document Reference 6.1);
 - 3.4 Physical activity, journey quality, accidents and affordability have been assessed in line with guidance in WebTAG Unit 4.1 (social impact appraisal);
 - 3.5 The distributional effects across society have been assessed in line with TAG Unit 4.2 (distributional impact appraisal); and
 - 3.6 The cost aspects have been assessed in line with Unit A1.1.
4. To date, no party has challenged any of the individual elements of the AST. Reading Friends of the Earth (Relevant Representation No. 295) have challenged aspects of the Scheme's assessment and drawn on values quoted within the AST to make particular points. However, they have not challenged the correctness of those values.