

Environment and Sustainability Committee

Meeting Venue:
Committee Room 3 – Senedd

Meeting date:
6 November 2013

Meeting time:
09:00

Cynulliad
Cenedlaethol
Cymru

National
Assembly for
Wales



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Agenda

1 Motion under Standing Order 17.22 to elect temporary Chair

2 Introductions, apologies and substitutions

3 Inquiry into the Welsh Government's proposals for the M4 around Newport – Evidence from Natural Resources Wales (09:00 – 09:30)
(Pages 1 - 37)
E&S(4)-26-13 paper 1

Graham Hillier, Executive Director for Operations South
Martyn Evans, Ecosystems Planning & Partnerships Manager South
Jessica Poole, Cardiff & Newport District Team Leader

4 Inquiry into the Welsh Government's proposals for the M4 around Newport – Evidence from Professor Stuart Cole (09:30 – 10:00) (Pages 38 - 50)
E&S(4)-26-13 paper 2

Professor Stuart Cole

5 Inquiry into the Welsh Government's proposals for the M4 around Newport – Evidence from The Federation of Small Businesses and South East Wales Transport Alliance (10:10 – 10:55) (Pages 51 - 81)
E&S(4)-26-13 paper 3 : Federation of Small Businesses

E&S(4)-26-13 paper 4 : South East Wales Transport Alliance (SEWTA)

Joshua Miles, Policy Adviser, Federation of Small Businesses
Iestyn Davies, Head of External Affairs, Federation of Small Businesses
Clive Campbell, Chair, SEWTA Policy Group
Simon Nicholls, Principal Transport Planner, SEWTA

6 Inquiry into the Welsh Government's proposals for the M4 around Newport – Evidence from Wildlife Trusts Wales, RSPB Cymru and Friends of the Earth Cymru (10:55 – 11:40) (Pages 82 - 97)

E&S(4)-26-13 paper 5 : Wildlife Trusts Wales

E&S(4)-26-13 paper 6 : RSPB Cymru

E&S(4)-26-13 paper 7 : Friends of the Earth Cymru

James Byrne, Living Landscapes Advocacy Manager, Wildlife Trusts Wales
Mike Webb, Senior Conservation Officer, Planning, RSPB Cymru
Gareth Clubb, Director, Friends of the Earth Cymru

7 Inquiry into the Welsh Government's proposals for the M4 around Newport – Evidence from the Institution of Civil Engineers Wales Cymru (11:40 – 12:10) (Pages 98 - 100)

E&S(4)-26-13 paper 8

Keith Davies, Director, Institution of Civil Engineers Wales Cymru

8 Papers to note (Pages 101 - 102)

Minutes of the meeting held on 24 October

Private session

9 Motion under Standing Order 17.42 to resolve to exclude the public from the meeting for item 9

10 Consideration of evidence (12:10 – 12:30)

Agenda Item 3

Document is Restricted

Evidence to the Environment and Sustainability Committee's Inquiry into the Welsh Government's consultation on the M4 corridor around Newport

Introduction

The purpose of Natural Resources Wales is to ensure that the natural resources of Wales are sustainably maintained, enhanced and used, now and in the future. We welcome the opportunity to respond to the committee's inquiry into the Welsh Government's proposals for consultation on the M4 corridor around Newport.

The current proposals from the Welsh Government are at an early, strategic, stage of development. A consultation is under way (23 September 2013 until 16 December 2013) on Welsh Government's draft plan and accompanying environmental assessments which at this stage include a Strategic Environmental Assessment (SEA) Environmental Report and work to inform a Strategic Habitats Regulations Assessment (HRA). We have already submitted a formal response to the scoping stage of the SEA and will be responding to all of the current consultations and documents. Our responses will be publicly available. As this consultation is at a strategic level there is no detailed design for us to comment upon. The options are the Welsh Government's preferred route corridor, two alternative route corridors which differ from the preferred route for approximately one third of its length and consideration of a do-minimum option (i.e. not building a new length of road, but taking into account already proposed transport schemes in the vicinity). The undertaking of the SEA and HRA processes at the strategic stage will inform the need for, and scope of, HRA and Environmental Impact Assessment (EIA) at the project stage.

1. Natural Resources Wales' roles with respect to the M4 Corridor draft Proposals

We recognise the strategic importance of the M4 Corridor to the economic well being of Wales and the wider economy of the United Kingdom. We are committed to working with Welsh Government to identify solutions to help enable the enhancement of the M4 Corridor whilst minimising significant adverse impact on environmental resources of acknowledged importance. Key environmental issues are set out in section 2 below. We will have a number of roles with respect to these proposals:

As an Advisor we provide a range of **technical advice** to inform the development of both the plan and its Strategic Environmental Assessment and plan level Habitats Regulations Assessment. Our advice is without prejudice to that which our Strategic Assessment Team may provide as Statutory Consultee and consultant body once the plans are finalised.

We are a Statutory Consultee on the statutory Strategic Environmental Assessment and plan level Habitats Regulations Assessment.

As a Regulator we have a number of different permitting/ licensing/ consenting roles, with follow up compliance and enforcement roles for any permissions granted, including, but not limited to:

- Flood Defence Consenting
- Environmental Permit or Exemptions - Waste Management Matters
- Environmental Permitting - Water Quality Discharges
- Environmental Permitting - Water Resource Matters
- European Protected Species licensing
- Nationally Protected Species licensing
- Site of Special Scientific Interest (SSSI) consents/ assents
- Marine Licensing

2. Key Environmental Issues for Natural Resources Wales

Potential Impacts on European Designated Sites

Sites of European importance for nature conservation are designated as Special Areas of Conservation (SACs) under the Habitats Directive, and Special Protection Areas (SPAs) under the Birds Directive, and are collectively known as European sites or the Natura 2000 network. In addition, it is Welsh Government policy that sites designated as Wetlands of International Importance, or Ramsar sites are also treated as European designated sites. This means that all three types of sites are subject to HRA; this is an assessment undertaken where there are draft plans, programmes or projects which are likely to have a significant effect on any of the designated features of any European site and the coherence of the Natura 2000 network. Responsibility for carrying out the HRA lies with the Competent Authority, the plan maker or project proposer - in this case the Welsh Government - and requires consultation with the appropriate nature conservation body – in this case Natural Resources Wales.

All of the three proposed new route alignments put forward as part of the draft plan would involve a new bridge crossing of the River Usk (SAC). The WG and Natural Resources Wales have the statutory duty to ‘avoid deterioration of habitats and significant disturbance’ under Article 6(3) of the Habitats Directive.

In addition there are a number of further European sites in the vicinity of the proposals which will need to be considered for potential indirect effects as part of both any strategic and/or project level HRA. Sites which potentially fall into this category include the Severn Estuary SAC, SPA and Ramsar site, and the Wye Valley and Forest of Dean Bat SAC. Such sites would initially be screened for the need for HRA on the basis of there being a mechanism for impact on hydrological connection or aerial emissions. There are a number of stages of a Habitats Regulations Assessment which apply at both plan and project stages:

- Assessment of Likely Significant Effect on a European site
- Where significant effects cannot be ruled out an Appropriate Assessment must be undertaken, which considers whether or not the plan or project will adversely affect the integrity of the European site, in view of the sites conservation objectives
- Where adverse effects cannot be ruled out the competent authority must ascertain whether or not there are alternative solutions to carrying out the plan or project. This consideration cannot take into account economic factors – i.e. a more expensive solution cannot be ruled out
- If there are no alternative solutions, the Competent Authority has to satisfy themselves both that there are imperative reasons of overriding public interest and

that sufficient compensatory measures can be secured to ensure the overall coherence of the European sites.

The Habitats Regulations Assessment process for this proposal requires the Welsh Government to ensure that there would be no harm.

Potential Impacts on National Designated Sites

In addition to the European designation there is a further suite of sites which are formally designated . In the context of these proposals the key sites are various Gwent Levels Sites of Special Scientific Interest (SSSI) that were notified because of the range of aquatic plants and invertebrates associated with the reens and ditches of the drainage system.

The special interest of these SSSIs is dependent on the existence of the drainage system and its continued management, together with the quality and quantity of water in the reens and ditches. Any development that has an adverse impact on any of these features may have an adverse impact on the wildlife for which the area was notified.

The Gwent Levels are important for both submerged plant species associated with open water, such as the hairlike pondweed *Potamogeton trichoides*, and emergent plants such as arrowhead *Sagittaria sagittifolia*.

In our opinion the following sites would be directly affected by any new road alignment as put forward in WG's draft plan:

- Gwent Levels: Redwick and Llandeenny SSSI
- Gwent Levels: Whitson SSSI
- Gwent Levels: Nash and Goldcliff SSSI
- Gwent Levels: St Brides SSSI

This is in the context of direct land take from these SSSIs (loss of SSSI area to road) as well as likely changes to water quality and available water quantity and restrictions on the ability for favourable management operations to be undertaken.

Additionally the following sites could be subject to indirect impacts:

- Gwent Levels: Magor and Undy SSSI
- Magor Marsh SSSI
- Gwlyptiroedd Casnewydd/ Newport Wetlands SSSI
- Gwent Levels: Rumney and Peterstone SSSI

It is worth noting that Gwlyptiroedd Casnewydd/Newport Wetlands SSSI is part of the Newport Wetlands National Nature Reserve, which was constructed to meet the commitment by the UK Government to create "a substantial area of wetland habitat on the shores of the Severn Estuary" as part of the compensation for the loss of the Taf/Ely Estuary SSSI following the construction of the Cardiff Bay Barrage.

Indirect impacts could arise to all of these sites from alterations in the pattern of drainage and changes to available water quantity and changes to water quality.

We are assessing the draft plan for the significance of these impacts in the absence of the detail which would form part of any subsequent project level consultation.

The Welsh Government has a duty to take reasonable steps to further the conservation and enhancement of the designated features when deciding whether to adopt the plan.

Potential Impacts on Protected Species

All species listed in Schedule 2 and 4 of the Conservation of Habitats and Species Regulations 2010 are European Protected Species. In the context of this draft plan relevant European Protected Species include:

- All Bat species
- Great Crested Newts
- Otters
- Dormice

Where a European protected species is present, and a proposal is likely to breach the legislation afforded to them, a development may only proceed, under a licence issued by NRW as the appropriate authority . We can only issue these licences where:

'Preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature, and beneficial consequences of primary importance for the environment.'

And only if there is:

'No satisfactory alternative' and that

'The development will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range'.

Consideration of the potential effects of a plan or programme on biodiversity, flora and fauna is mandatory under the SEA process.

At the strategic stage and in the absence of detailed survey information which would form part of an EIA we cannot say whether any of these European Protected Species will be affected by the scheme, although we can advise that all of these species have been previously recorded in the vicinity of the route corridors under consideration in the draft plan.

In addition there are a number of other species of animals and plants protected by national legislation. Similarly, in the absence of detailed survey we cannot say whether of these species will be affected.

Historic Landscape

Consideration of the potential effects of a plan or programme on cultural heritage is mandatory under the Strategic Environmental Assessment process.

The importance of the historic landscape is reflected in the inclusion of the Gwent Levels in the Register of Landscapes of Outstanding Historic Interest (Cadw: Welsh Historic Monuments/ICOMOS UK (International Council of Monuments and Sites)/CCW), 1997)

Competent authorities are asked to take information on the Register into account when considering the implications of developments that “are of such a scale that they would have more than local impact on an area on the Register”, (Planning Policy Wales, 2012). The Assessment of the Significance of the Impact of Development on Historic Landscape Areas on the Register (ASIDOHL2) methodology is used to assess the significance of potential impacts of developments on historic landscapes in liaison with the appropriate Welsh Archaeological Trust and Cadw..

Water

Consideration of the potential effects of a plan or programme on water is mandatory under the Strategic Environmental Assessment process.

Water Framework Directive

The overarching aim of the EU Water Framework Directive (WFD) is to achieve an integrated system of water protection, improvement and sustainable use. All aspects of water, including water quality, quantity and flow (surface and groundwater), water supply and capacity, wastewater treatment and flood risk should be considered. Their impacts on ecological interests are also relevant.

The Directive requires no deterioration in the status of water bodies. All bodies of surface water and groundwater are to aim to achieve good status by 2015. The Directive allows for extended deadlines for achieving this up until the end of the third cycle in 2027. Discharges of priority hazardous substances (the most toxic substances discharged to waters) must cease by 2020.

Transport schemes may produce priority hazardous substances such as cadmium, zinc, copper, mineral oils and organic pollutants. The scheme should demonstrate that there will be no detrimental effect on the status of relevant water bodies. A realistic and feasible programme of measures, costs and commitments must be put in place in order to address any identified water body impacts. Alternatively, the scheme must not adversely affect water resources, water features and water availability at a strategic or project level.

Managing Flood Risks

Proposals must be assessed at both strategic and project development levels. This includes consideration of the potential effects of a plan or programme on material assets and in respect of climate.

The M4 Corridor proposals Around Newport are located in areas considered to be of high flood risk hazard, being based on Welsh Government's Development Advice Maps and our own Flood Zone Maps. With regard to tidal flood risk, existing infrastructure, mainly to the south of Newport is protected against tidal inundation.

In the identification of issues and effects, a precautionary approach should be adopted directing the preferred route option away from areas considered to be of high flood risk hazard. Subsequently, the management of risks and consequences of flooding must be demonstrated as acceptable over the lifetime of development (75 years in line with current Project Appraisal Guidance) given climate change factors. The application of climate change factors may indicate tidal breach/overtopping of the sea defences.

The risks from coastal, main river and/or surface water flooding must be assessed. The effects of the Scheme on flooding elsewhere will need to be established and demonstrated as acceptable.

We will require a water management scheme to be agreed and effectively implemented.

Flood Defence Consent will be required from us for work on, over or close to designated main rivers whilst ordinary watercourses will be subject to consent by the Lead Local Flood Authority.

Soils and Land affected by contamination

Consideration of the potential effects of a plan or programme on soils is mandatory under the Strategic Environmental Assessment process.

Additional Matters Relating to Land Affected by Contamination

There will be significant engineering challenges necessitating detailed technical assessment given the location of the route adjacent to active and historic landfill sites, including Docks Way Landfill.

Any remediation and engineering solutions proposed will need to prevent adverse impacts on controlled waters, soils and ecological interests. We will need to be assured that any mobilisation of contaminants can be avoided.

In the event of any necessary variations to the installations existing Environmental Permits we would need to be satisfied that there would not be adverse environmental impact upon ongoing operation and long term management.

The proposals may offer the opportunity to improve, restore and enhance the soil resource.

Additional Waste Management Matters

We welcome the production of a waste management strategy and plan.

Additional Matters relating to Air Quality

Consideration of the potential effects of a plan or programme on air is mandatory under the Strategic Environmental Assessment process.

We welcome the opportunity to discuss methodologies and parameters for the assessment of air quality and deposition of air borne pollutants and resulting impacts.

3. Natural Resources Wales approach to the draft plan

Our staff are building a good working relationship with the Welsh Government project team and their advisor, Arup. Within the organisation we are confident we have the skills and capabilities necessary to advise and respond to the planning process..

Natural Resources Wales's Strategic Assessment Team will fulfil the statutory consultee role in responding to the SEA Environmental Report and HRA work, at arms length and functionally separate from all staff involved in providing the 'without prejudice' informal advice in meetings and formal response to the draft plan itself.

Natural Resources Wales will not be responding to the Health Impacts Assessment and Equality Impact Assessment as these issues fall outside of our remit.

At a later stage, were any project level road scheme to come forward we will have a role in considering permit/ licence/ consent applications and seeking advice as part of those considerations.

4. Summary

Natural Resources Wales are actively involved in assessing the draft M4 corridor plan and accompanying environmental assessments with respect to our statutory environmental remit. The draft plan raises significant issues across our remit, including with respect to designated sites, flood risk, protected species, contaminated land, waste management and historic landscape. We are currently assessing the level of significance of these issues to provide Welsh Government with a considered view on their draft plan as their statutory environmental advisor. We look forward to having continued dialogue with you on the M4 Corridor around Newport and in particular with regard to environmental matters.

Cyfoeth Naturiol Cymru / Natural Resources Wales
16 October 2013

Agenda Item 4

NAfW Env M4 A48 v5 Short 23 Oct 13

Y PWLLGOR AMGYLCHEDD A CHANALIADWYEDD v5
CYNILLIAD CENEDLAETHOL CYMRU
CYNIGION LLYWODRAETH CYMRU AR GYFER YR M4 YN ARDAL
CASNEWYDD

YMATEB O: Yr Athro Stuart Cole, CBE BA MSc FCILT FICE, Athro Emeritws mewn Trafnidiaeth, Canolfan Ymchwil Trafnidiaeth Cymru, Prifysgol De Cymru

NATIONAL ASSEMBLY FOR WALES
ENVIRONMENT AND SUSTAINABILITY COMMITTEE
GOVERNMENT PROPOSALS FOR THE M4 AROUND NEWPORT

SUBMISSION FROM: Professor Stuart Cole CBE BA MSc FCILT FICE,
Emeritus Professor of Transport, Wales Transport Research Centre, University of
South Wales

INTRODUCTION

This submission presents the traffic and economic aspects of schemes for reducing congestion on the M4 corridor around Newport. It draws attention to the assumptions made in respect of future traffic expectations and refers briefly to environmental consequences. The submission proposes an alternative lower cost, more environmentally sensitive route, based on the lower road capacity which could be needed.

Integrated Transport Policy Context

The draft plan for the project *M4 Corridor around Newport* published by the Government (23 September 2013) itself says 'it does not include public transport measures because the Welsh Government has commissioned a separate study and report on proposals to develop a Metro system for south east Wales'

Over the longer term the Sewta Rail Strategy proposes over twenty new stations at for example Llanwern and Coedkernew; increased capacity on the Ebbw Valley line, and a new line to Creigiau and Beddau. The objective is to attract car commuters away from the M4, A470 and other key routes and onto the railway.

The Sewta plan concludes: 'several of its recommendations should be packaged to form an M4 corridor corporate strategy to provide realistic alternatives to car use in this congested corridor'. The forthcoming M4 public consultation should include the Cardiff Regional Metro, electrification of the SWML, the Sewta plan and the omitted A48 / steelworks road upgrade option. If it does not, then there is no integrated

transport element; it would be contrary to Government transport policy and it would be a mistake.

Causes of congestion on the current M4 - Summary

- Its original design as the Newport northern by pass / northern distributor road later linked in to the M4. It has design faults resulting from that including the lack of a hard shoulder for some of its length. Its resultant capacity is insufficient for current traffic volumes.
- The Brynglas Tunnels and adjacent structures (Usk bridge; steep climbing structure to the east; canal bridge to the west) which reduce a six lane motorway to four lanes
- The M4 is used by local traffic as a local distributor road for short journeys within the local urban area.

In addition the resilience of the M4 at times of temporary traffic disruption requires an alternative route

Traffic requirements and transfers

The consultation paper *M4 Corridor around Newport* forecasts a need for 20% more traffic capacity by 2035

The Black/Purple Route is estimated to divert up to 40% of traffic away from the existing M4. This is more (far more?) than adequate.

The proposed Blue Route is expected (based on Option C figures) to divert 6% - 10% but this may be an underestimate and 15% might be more appropriate. This paper suggests a rationale and forecast reassessment be carried out.

The consultation paper takes no account of the impact of rail electrification or the Metro developments under consideration by the Government along the M4 corridor. On the basis of for example the Newcastle upon Tyne Metro (1990's) and the Bordeaux Tram network (2004) then an expected 20% - 30% transfer of peak traffic would be a conservative assessment.

Rail electrification alone could reduce M4 peak traffic flows by 15%. This level of modal change and rail increased demand would justify the total investment in track, stations, train / tram train / tram rolling stock, buses and interchange hubs and obtain an acceptable benefit cost ratio (BCR).

The Blue Route is likely to solve the congestion issue on the M4 as it arises. It will match forecast flows as they progress over the evaluation period and could provide congestion relief earlier than the Black / Purple Routes. The combined project with Metro / rail electrification could provide more than adequate relief to congestion over the period to 2035 based on the potential outputs of the re-run forecasts and actual growth

The construction logic also fits in that the congestion solution can be part – completed within five years and part over the following ten to fifteen years. This also runs in parallel with Welsh Government funding options

GOVERNMENT OPTIONS / ANOTHER OPTION

Additional capacity is required to reduce peak period traffic congestion on the M4 to the west, north and east of the Newport urban area of Newport. This is not in question.

The Government's proposals initially included four options including a section of the A 48 Newport Southern Distributor Road (SDR) now along with the Steelworks Road included in the Blue Route and put forward in this submission. The Government options referred to are:

- **Option C:** existing A48 with grade separated junctions (WelTAG, March 2013) Now discontinued from the range of options by the Government
- **Red route:** all – purpose new dual 2 – Lane road (WelTAG, 24 June 2013)
- **Purple route / Black Route** – the full motorway standard proposals

The completion date of 2033 was based on affordability if borrowing powers were not available. This remains the case currently. Any financial agreement between the Welsh Government and HM Treasury is unlikely to contain a road with no revenue stream such as tolls (or shadow tolls with revenue account expenditure consequences) to cover its costs. All borrowing would have to be within the PSBR cap set by HM Treasury.

The transfer of the Severn Bridge tolls by England's Department for Transport thus foregoing a lucrative 'cash cow' when facing budget cuts is unlikely unless maintenance costs escalate post concession.

- **Blue Route** (proposed in this submission)
The issue is whether the Black / Purple Routes proposed by the Government provide an unnecessary increase in capacity and in consequence unnecessary expenditure. The analysis considers whether the options on the basis of traffic forecasts a lower cost lower capacity and lower environmental impact option (called in this submission the Blue Route) would be more appropriate. A detailed description is shown below. Mapping of the route is shown in *M4 Corridor around Newport* (p8; p27-28).

The Blue Route proposal is a combination of the A48 Southern Distributor Road upgrade (as in Option C) together with the Steelworks road re-constructed as a 2 lane dual carriageway all – purpose road at motorway standard. The land acquired was sufficient for widening to a 3 – lane motorway standard at a future date.

The Blue Route involves an upgrade of the whole route from Junctions 23a and J24 in the east to Junction 28 or 29 in the west. This would involve upgrading the current A48 SDR whose traffic flows are lower than were expected. This it has been suggested was largely a consequence of the number of at grade intersections which disrupt the free flow of east west traffic. Grade separated junctions would give these flows greater priority.

Cost Estimates – M4 Corridor Options

Cost estimates of the various schemes are available¹, based on existing Department for Transport and Welsh Government guidance, and subject to caution. The cost estimates assumed each scheme to have an opening year of 2020, and include construction costs, land and property costs, preparation and supervision costs, and traffic-related maintenance costs.

A48 Grade-Separated Junctions as “Option C” -	£345m
Dual Carriageway on the Red Route -	£830m
Motorway on the Black Route -	£936m
Blue Route (A48 / SWRd) -	£380m

TRAFFIC FORECASTS – M4 CORRIDOR AROUND NEWPORT

UK Government road traffic forecasts continue to show traffic growth but other research shows that car usage has fallen since 2006 and plateaued with slow future growth.

There is sufficient uncertainty therefore to question whether what is needed is a major new motorway (£936 m) (based on older forecasts and not taking account of recent car flow trends) or a considerably lower cost alternative (£380m) – The Blue Route.

This option rebuilds, with grade-separated inter-sections, the A48 south of Newport and the Steelworks road (A 4810) the latter purchased from Tata Steel by the Welsh Government to increase east – west road capacity and reduce M4 congestion. The lower cost scheme could be constructed by 2018.

The Steelworks Road was purchased by the Government from Tata Steel in 2006 to provide land to build a 7 km long section of the M4 relief motorway from J 23A. It was intended to link into the A 48 between J 24 and J 28. Both roads would then

¹ <http://wales.gov.uk/docs//det/publications/130626m4weltagcemen.pdf>

have grade separated junctions constructed. This scheme has been developed into the Blue Route

The primary reasons for putting forward the Blue Route are:

- The uncertainty of current traffic forecasts generally
- Therefore the need to consider if the size of construction (and its cost) is justified.
- If it is not justified then unnecessary environmental disbenefits and damage are incurred
- The opportunity cost of construction if excessive financial allocation is made to this one scheme. It can through either direct (revenue account) expenditure terms or borrowing limits preclude other transport projects
- All motorways of the M4's age will require major maintenance over the next 5 – 10 years.
- The proposition is a 2 – lane Expressway standard dual carriageway matching lengths of the A470, A48 Carmarthenshire and the A55 will provide the required resilience.

Traffic forecasts – discussion

The traffic forecasts in the consultation document *M4 Corridor around Newport* (Fig 5 page 11) indicate an increase in traffic of 20% over the period to 2035.

This forecasting model (TEMPRO) uses assumptions on projections for the following variables

- Population
- Household
- Workforce
- Employment

As indicated above it excludes public transport proposals and their possible impacts on traffic flows

The traffic flows on the M4 north of Newport over the period 2006 – 2013 has been relatively level as shown in the Government's own publication *The M4 Corridor around Newport* (Fig 3 and Fig 4 page 10)

There was substantial growth in the late 1990's but a levelling off from 2001 with a slight fall to 2012. There is therefore limited traffic evidence to suggest any change from the traffic flow plateau which has been in evidence since 2001 and a falling mean line from 2005.

The underlying trends for traffic over the last eight years have been affected by:

- The economic downturn with static wages falling in real terms or unemployment reducing work journeys
- Traffic congestion on strategic routes resulting in a transfer to train
- Improvements in rail service capacity and reliability following investment by the Government in rail services since the new franchise took effect in 2004 / 05.
- The increase in petrol costs compared with rail fares has resulted in a cross price elasticity effect with a modal shift from car to rail
(Please see Integrated Transport Policy Context above)

In his paper to recent conferences Professor Peter Jones (CILT(UK) Public Policies Committee, London/ TUSG (UK) Conference Cardiff, 2013) suggests possible causal variables for the flattening of car usage

- Increases in car costs
- Income and GDP effects
- Deterioration in road conditions
- Improvements to the rail network
- Spatial planning policies
- Smarter choices
- Improved mobile and internet Communications
- Company car ownership and free fuel taxation regulations relating to payment in kind, have cut the number (in Great Britain) of taxpayers claiming both car and free fuel

The company car change and income and GDP are only two variables which will be counteracted by the others having a negative effect on car usage

Professor Phil Goodwin (UK Transport Statistics Users Group Conference, Cardiff, May 2013) suggested non – transport trends as causal variables in the plateauing of car use.

- Rise in mobile phone computing
- Cultural and attitude changes
- Health, and environment as motivational factors to cut down on car use
- Demographic changes – aging population; more single person households; women having children at a later age; young people and ‘empty nesters’ going back to live in city centre locations
- Changing images of contemporary life idyllic living and travelling lifestyle
- Projected revenue growth of online shopping and the growth in internet access, e-mails etc. from mobile phones has, and will increasingly reduce work and retailing journeys

There are other developments in urban transition, transport and taxation policy:

Urban Policy and Transition – economically wealthy cities with high incomes and growing population show the greatest reduction in car use. There have been reductions in car use in medium sized towns and in ‘sustainable travel towns’ (2004 – 08) and lower car use in high density new urban develop. This is the case in Cardiff and Newport. Thus policy impacts and lifestyle change has also reduced car usage and is not restricted to an economic downturn.

Some evidence suggests that the cumulative effects to discourage car use and encourage walk/cycle/public transport also have bigger impacts on car use than income and prices. The recent Active Travel Act should have that effect

Tax revenue from the transport sector especially fuel excise duty had little effect on car usage until the mid – 2000’s

Demand Management e.g. parking and road charging by usage; access quantity limits or prohibition

Position in Wales

Between 2007 and 2011 Wales saw reductions in traffic of

- Cars - 4%
- Motorcycles - 11%
- Buses/coaches - 14%
- Goods vehicles - 16%
- Pedal cycles + 26%
- All motor vehicles - 4%

The stock of vehicles and the number of new registrations has fallen

There could be several reasons for this change in Wales:

- A modal shift to other forms of transport
- buoyancy of the economy or high fuel prices
- Longer term influences such as demographic change or behavioural change such as concern for the environment; geographical travel patterns;
- short term influences on car use are fuel prices (price elasticity) and incomes
- In the longer term population growth will give a rise in average car usage. Wales, population projections for the under 29 and 30 – 69 age groups (the biggest car users) are fairly constant from 2010 to 2034.

Traffic forecast conclusion

The conclusions to be drawn on future trends not peculiar to this project but applicable to most British and European Union road projects are:

- The presumption that car mileage has peaked arises from contrasting trends of reduced car usage in London; increases in rural areas. It might be suggested therefore that an area such as the Cardiff, Newport (and Valleys / Vale) and Bristol could be in between those two extremes
- After the recession ends, will there be a lower level of car usage in absolute terms and will the rate of increase be similar to that in the immediate pre – recession
- The forecast outcome (in *M4 Corridor around Newport*) does not reflect the recent trend and show a sharp uplift from 2012 to 2030 of 20%. An average growth of just over 1%
- The assumptions are based on economic activity and car ownership rather than projected changes in modal split with no interpretation of the impact of major rail investment.
- It is the uncertainty of the projections as suggested here and by the President of the Institution of Civil Engineers (ICE) Professor Brian Clarke. Professor Clarke made two key points at the National Transport Conference in Cardiff (September 2013) – (a) we are not sure if private motoring has peaked and (b) we are not sure if the trend in reduced driving by young males will continue
- It is uncertain if the peak of car usage has been reached; that situation is contested, as the discussion over the Blue and Black / Purple Route options shows. A resolution needs to be achieved before the decision to build the Black / Purple Route or the Blue Route
- The main drivers of the growth on car use – income, prices (e.g. fuel, competing public transport), population size and projections have not changed in any major way.
- Car usage is likely to grow following economic recovery or increased consumer confidence but at a declining rate but in proportion to population change through the 30 – year forecasting period
- Two large, respected business groups in Wales the FSB and the CBI both recognise the need for additional road capacity around Newport. The CBI refers to a M4 relief road being their first priority. The FSB specifies a grade-separated A48 / Steelworks Road as being sufficient capacity and investing a large proposition of borrowing in one scheme is not in the best interests of the Welsh economy

BLUE ROUTE ALTERNATIVE OPTION

Description of the scheme

As this option is not set out in the consultation document *M4 Corridor around Newport* a summary of the WelTAG Stage 1 analysis is set out here. A comparison of WelTAG Stage 1 scores for the Government proposals and this alternative are shown in Appendix 1. A map is also provided showing all options.

Up to March 2013 the Government Option C proposal had been assessed against the WeITAG criteria. The option would 'improve the resilience of the network (including the M4) and could be phased to spread investment costs. The benefits to the A48 corridor upon scheme completion would be realised through journey time improvements, accessibility gains for southern Newport (including some of the city's most disadvantaged wards), and "*benefits for the movement of people and freight to key employment areas and services*". The negative impacts would include the possibility of some minor demolition of buildings, visual adverse impacts, and some biodiversity losses associated with the River Usk SAC (though the biodiversity rating for the scheme is more positive than the motorway' – extract from WeITAG Stage 1 analysis (March 2013)

The Blue Route proposal is a combination of the A48 Southern Distributor Road upgrade (as in Option C) together with the Steelworks road re-constructed as a 2 lane dual carriageway all – purpose road at motorway standard. The land acquired was sufficient for widening to a 3 – lane motorway standard at a future date.

The Blue Route involves an upgrade of the whole route from Junctions 23a and J24 in the east to Junction 28 or 29 in the west. This would involve upgrading the current A48 SDR whose traffic flows are lower than were expected. This it has been suggested was largely a consequence of the number of at grade intersections which disrupt the free flow of east west traffic. Grade separated junctions would give these flows greater priority.

The junctions where this may be feasible are Pont Ebbw, Maesglas West / East, Docks Entrance, Usk Way, Corporation Road, Nash Road, Queensway Meadows, Hartridge and Beatty Road. The intersection at Queensway Meadows could also be the link onto the A4801 Steelworks Road. This would facilitate two links onto the M4 at J24 and J23a respectively.

At the western end of the A48 north of Tredegar House conservation area and entering the M4 at J 28 there is currently a confluence of high peak traffic flows. The present A48 becomes a single carriageway 4 lane road between the Pont Ebbw junction and J28 on the M4. Currently there are traffic flow constraints at peak periods. There are Government proposals for redesigning this largely at grade junction.

The 4 lane single carriageway road will require dualling to be able to carry the anticipated additional traffic particularly from the A487 and the M4. There is woodland to the north adjacent to Tredegar Park sports facilities which could be affected. To the south are UK Government and Agency offices with car parking and some recent tree plantings immediately adjacent to the highway. The National Trust property at Tredegar House is not compromised by this scheme.

Land take

This is best shown on a map of the area which can be made available to the Committee.

The Blue and Purple motorway options will take considerably more greenfield land than the proposed Blue Route which concentrates construction on using the existing road footprint, ex industrial land at Llanwern Steelworks with some limited areas of greenfield land

Economic impact

The upgrade of the A48 / SWRd could improve journey time reliability on the existing M4 corridor around Newport by offering an alternative route to the M4 in general and also in the event of major incidents on the present M4. This relief of traffic could improve the efficiency of long distance traffic (freight and people) thus providing improved connectivity to / from England and thus contribute to employment. An improved A48 passes through important retail, distribution and manufacturing areas.

Initial traffic modelling showed that travel time on the network could be reduced as a result but there would be delays during construction. This last issue has been a consideration on the improvement of for example the M4 at Cardiff Gate but has in such cases been put aside as a reason for not proceeding with construction.

Environmental impact

The Red Route and the Purple / Black Routes (new M4) cross the River Usk SAC and SSSI and the Gwent Levels SSSI.

The Blue Route will touch the Gwent Levels SSSI at Barecroft Common and is therefore not free of any adverse environmental impact. However the Steelworks Road extension has now been constructed (see below) with a single carriageway link to J23a.

The Blue Route should give by far the lowest environmental impact for any road network improvement. As the new Steelworks road has largely been constructed as an at - grade roadway this would militate against any further adverse environmental consequences.

The grade separated junction construction would create some issues but this could coincide with the proposed construction of 4000 houses on the adjacent land. However the resultant more freely flowing traffic could be expected to reduce emissions and noise.

This route should reduce traffic congestion on the M4 and thus environmental impacts there; there will be some increase in traffic noise along the A48 / SWRd. Present land use is largely industrial or commercial with some housing where amelioration measures can be taken while levels of emissions and noise which are reducing as the age profile of the private car 'fleet' falls.

Social impact

North of the Steelworks Road section of the proposal, south of the GWML railway and west of the Llanwern Steelworks, the Glan Llyn and other developments will result in 4,000 houses and 40 ha of employment land. This site will be accessed by the Steelworks Road.

At present, the access junctions are at grade controlled by traffic lights or roundabouts. This proposal would see these changed to grade-separated junctions. This should improve accessibility to the sites and provide greater connectivity to other parts of Newport and the M4 both east bound and west bound. The planning of these access points should have been (or should now be) considered to be compatible with the land use activities (e.g. cement works and new housing, steelworks, HGV operations to/from distribution centres and the Magor Brewery).

Any adverse effects on cyclist and pedestrian movements will need to be taken into account. Alternative routes can be provided so that any increased traffic volumes on the proposed corridor do not increase hazards or community severance. This applies particularly to the Purple/Black routes because as motorway options they would not include any provision for cyclists and walkers.

CONCLUSION

- Review the current forecast assumptions bringing in those causal variables suggested above
- Consider the wider context includes recognition of the benefits of avoiding construction on environmentally sensitive sites south of Newport
- Consider the substantial cost savings that would be made in pressing ahead with the Blue Route (A48 Southern Distributor Road and the Steelworks Road) proposal set out below rather than a new M4,
- Consider the wider financial context and significant spare borrowing capacity being available to the Welsh Government for measures to complement the A48, including bringing forward the plans for a Metro system and other transport infrastructure projects in south-east Wales.

Professor Stuart Cole
October 2013

(Appendix 1 follows)

Appendix 1

M4 Corridor around Newport WelTAG Stage 1 Comparison of Option Scores

Criteria	Doing Nothing	Red Route All-Purpose Road	Purple Route Motorway	Black Route new M4	Blue Route
Economy					
Transport Economic Efficiency (TEE)	(---)	(++)	(+++)	(+++)	(++)
Economic Activity and Location Impact (EALI)	(---)	(++)	(++)	(+++)	(++)
Environment					
Noise	(--)	(0)	(0)	(+)	(+)
Local Air Quality	(--)	(+)	(+)	(++)	(+)
Greenhouse Gas Emissions	(-)	(0)	(+)	(+)	
Landscape and Townscape	(0)	(---)	(---)	(---)	(0)
Biodiversity	(0)	(---)	(---)	(---)	(-)
Heritage	(0)	(--)	(--)	(--)	(0)
Water environment	(0)	(--)	(--)	(--)	(0)
Soils	(0)	(---)	(---)	(--)	(0)
Social					
Transport safety	(--)	(++)	(+++)	(+++)	(++)
Personal security	(0)	(+)	(+)	(+)	(+)
Permeability	(-)	(+)	(+)	(+)	(+)
Physical fitness	(0)	(+)	(0)	(0)	(+)
Social inclusion	(-)	(0)	(+)	(+)	(0)
Equality,	(0)	(+)	(+)	(+)	

Diversity & Human Rights					
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M4 Relief Road

FSB Wales
response to the
Environment
and
Sustainability
Committee

18th October 2013





M4 Relief Road

The Federation of Small Businesses Wales

The Federation of Small Businesses Wales welcomes the opportunity to present its views to Environment and Sustainability Committee on the M4 relief road proposals. FSB Wales is the authoritative voice of small businesses in Wales. With 10,000 members, a Welsh Policy Unit, two regional committees and twelve branch committees; FSB Wales is in constant contact with small businesses at a grassroots level. It undertakes a monthly online survey of its members as well as an annual membership survey on a wide range of issues and concerns facing small business.

Introduction

FSB Wales agrees that there are acute problems in and around Newport as a result of congestion on the M4. However, FSB Wales does not believe the economic, environmental and affordability concerns around the proposed M4 relief road have been sufficiently balanced. This is particularly the case for the current consultation, to which FSB Wales is yet to submit a full response. Wider consideration of the costs is needed to allow for further consideration of the infrastructure investment options that are available, including public transport measures such as the South East Wales Metro.

Borrowing powers and the Silk Commission

FSB Wales has taken an active interest in proposals for dealing with capacity issues on the M4 in and around Newport. FSB Wales has sought to make its position clear in relation to the proposed M4 relief road as well as the recommendations of part one the Commission on Devolution in Wales and proposals for the devolution of toll income to the Welsh Government.

As a result of this ongoing engagement FSB Wales has written to both the Secretary of State for Wales and the First Minister to clarify its position and to seek a speedy resolution to the question of fiscal devolution (both letters are attached). This included three main points that were as follows:

- The level of tolls levied on vehicles using either of the Severn Crossings should decrease at the earliest opportunity in order to remove a barrier to cross border trade and economic growth. Future toll revenue is an insufficient and unreliable source upon which to predicate borrowing for infrastructure;
- FSB Wales accepts the need to maintain tolls to fund the maintenance of the Crossings but that any future tolls should be limited solely to covering the costs of maintenance and specifically those costs directly associated with maintaining the Severn crossings and not the ordinary costs associated with maintaining the highways. We also point out that we are currently of the opinion that the management of the tolls should be devolved to Wales;
- The UK Government's delay in responding to the first part of the Commission on Devolution in Wales is in our opinion causing uncertainty and having a negative impact on the Welsh economy.



Affordability of a relief road

During the previous consultation on improving capacity in and around Newport, FSB Wales favoured option C which included a number of measures around the A48 to the south of Newport as well as associated public transport measures. This would cost an estimated £300m according to the Welsh Government consultation and would alleviate many of the problems of resilience and capacity¹.

The Commission on Devolution in Wales has created the possibility of the Welsh Government accessing borrowing powers of roughly £1.3bn as a result of fiscal devolution to Wales². This has caused the Welsh Government to re-examine the potential for an M4 relief road to the south of Newport as an additional alternative. Research carried out by Arup on behalf of the Welsh Government has estimated that the three options provided in the current consultation would cost between £830m and £947m to implement³. Many observers have estimated that this cost could rise significantly.

FSB Wales believes that given the significant environmental impact the full relief road would cause, there would likely be costly challenges to the implementation of the proposed development. This is reinforced in the previous Welsh Government consultation that stated:

“Challenge from public and/or stakeholders who may oppose the scheme on grounds of likely environmental impact may also require consideration.”⁴

Furthermore, FSB Wales is firmly of the view that focusing a significant proportion of spending on a narrow section of motorway in South East Wales is not an equitable use of resources. Rather, the Welsh Government should look to fund significant projects across Wales, such as improvements to the A55, the implementation of the South East Wales Metro and the potential electrification of the North Wales Main Line.

It is disappointing to see that the current consultation includes no information about the costs of the three proposed relief roads. This is available in the supporting documentation but is not being put in context during the public consultation. FSB Wales believes this undermines the consultation process.

Furthermore, there are clearly a number of alternatives such as the development of the A48 SDR and the South East Wales Metro that are not part of the consultation process. FSB Wales believes

¹ Welsh Government. 2012. *M4 Corridor Enhancement Measures Magor to Castleton (M4 CEM): Easing The Flow* [online]. Available at:

<http://www.m4cem.com/downloads/reports/to%20email%20Consultation%20Document%20REV%20B%20-%20E.pdf> (accessed 16th October 2013). P.42.

² Commission on Devolution in Wales. 2012. *Empowerment and Responsibility: Financial Powers to Strengthen Wales* [Online]. Available at:

<http://commissionondevolutioninwales.independent.gov.uk/files/2013/01/English-WEB-main-report1.pdf> (accessed 16th October 2013). P.115.

³ Welsh Government. 2013. *M4 Corridor Around Newport: WelTAG Appraisal Report Stage 1 (Strategy Level)* [Online]. Available at: [http://www.m4newport.com/assets/issue-m4-corridor-around-newport-weltag-appraisal-report-stage-1-\(strategy-level\).pdf](http://www.m4newport.com/assets/issue-m4-corridor-around-newport-weltag-appraisal-report-stage-1-(strategy-level).pdf) (accessed 16th October 2013). P.41.

⁴ Welsh Government. 2012. *M4 Corridor Enhancement Measures (M4 CEM): WelTAG Appraisal Report Stage 1 (strategy level)* [Online]. Available at: <http://www.m4newport.com/assets/issue-m4-weltag-stage-1-appraisal-report-march-2013-signed.pdf> (accessed 16th October 2013). P.61-62



this is a mistake and does not allow for the consideration of the full menu of options available to the Welsh Government.

Environmental Impact

The consultation issued by the Welsh Government during March and July 2012 contained an analysis of the environmental impact of the four options then presented. Clearly, option A (a new relief road to the south of Newport) offered the biggest economic advantage but also provided the most serious threat to the environment and at the highest cost in terms of capital investment⁵.

FSB Wales believes that pursuing improvements to the A48 whilst also improving public transport in the areas would be a more reasonable option. This is particularly pertinent given that the current consultation identifies 43 per cent of journeys being less than 20 miles i.e. local traffic. The economic benefit of the A48 approach would still be significant, but the environmental and cost concerns would be far more limited. Furthermore, practical measures could be put in place far sooner for its delivery.

Conclusion

FSB Wales agrees that there are acute issues of capacity on the M4 in and around Newport. However, initial observations suggest the environmental, economic and affordability aspects of the proposals for a relief road south of Newport are not sufficiently balanced. The Welsh Government has failed to examine wider options such as electrification and improvements to the A48 as part of the consultation. Furthermore, the omission of cost implications in the public consultation undermines its credibility.

⁵ *Ibid.* P.57.

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The Federation of Small Businesses

The FSB is non-profit making and non-party political. The Federation of Small Businesses is the UK's **largest campaigning pressure group** promoting and protecting the interests of the self-employed and owners of small firms. Formed in 1974, it now has **200,000 members across 33 regions and 194 branches**.

Lobbying

Our lobbying arm - led by the Westminster Press and Parliamentary office - applies pressure on MPs, Government and Whitehall and puts the FSB viewpoint over to the media. The FSB also has Press and Parliamentary Offices in Glasgow, Cardiff and Belfast to lobby the devolved assemblies. Development Managers work alongside members in our regions to further FSB influence at a regional level.

Member Benefits

In addition, Member Services is committed to delivering a wide range of high quality, good value business services to members of the FSB. These services will be subject to continuing review and will represent a positive enhancement to the benefit of membership of the Leading Business Organisation in the UK.

Vision

A community that recognises, values and adequately rewards the endeavours of those who are self employed and small business owners within the UK

The Federation of Small Businesses is the trading name of the National Federation of Self Employed and Small Businesses Limited. Our registered office is Sir Frank Whittle Way, Blackpool Business Park, Blackpool, Lancashire, FY4 2FE. Our company number is 1263540 and our Data Protection Act registration number is Z7356876. We are a non-profit making organisation and we have registered with the Information Commissioner on a voluntary basis.

Associate Companies

We have two associated companies, FSB (Member Services) Limited (company number 02875304 and Data Protection Act registration number Z7356601) and NFSE Sales Limited (company number 01222258 and Data Protection Act registration number Z7315310).



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Rt Hon David Jones MP
Secretary of State for Wales
The Wales Office
Gwydyr House,
Whitehall
London
SW1A 2NP

09 September 2013

Dear Secretary of State,

Severn Crossings tolls and proposed M4 relief road

Following recent developments regarding the issue of the Severn Crossings tolls and the proposed M4 relief road, I would like to clarify the position of FSB Wales.

Tolls damage the Welsh economy

FSB Wales members believe that the Severn Crossings tolls have a damaging effect on the Welsh economy. While it is difficult to isolate the exact impact that the tolls have, this theory is supported by research from the Welsh Government in 2012 which showed that the total costs of the tolls to businesses and consumers is in excess of £80M per year, taking VAT into account (Welsh Government, *The Impact of the Severn Tolls on the Welsh Economy*, 2012). The impact on individual businesses has been well articulated by numerous small firms, companies and individual traders in a series of research and information-gathering exercises, most recently at an informal session held by Stephen Hammond MP in response to the Welsh Affairs Committee's own report into the subject. The Committee highlighted its concerns that the high level of the tolls on the Severn Crossings hampers the development of businesses in Wales and deters inward investment to Wales (Welsh Affairs Committee, *Crossing the Border: Road and Rail Links between England and Wales*, 2012). In its report, it was recognised that other strategic road

crossings had benefitted from the removal of tolls. It also noted that other economic impacts such as the imposition of changes to VAT which have generated additional income for HM Treasury.

Despite opposition to the principle of road tolling, FSB Wales wishes to hold a pragmatic ('real world') position that recognises the strategic importance of both crossings to the communities either side of the Severn Estuary. As such, our members accept the need to maintain tolls to fund their maintenance but are strongly of the view that any such tolls should in the future be limited solely to covering the costs of maintenance. This cost should be limited to the costs directly associated with maintaining the Severn crossings and exclude the ordinary costs associated with maintaining the highways.

M4 relief road

We understand the desire for an M4 relief road. In responding to the Welsh Government's consultation on M4 Corridor Enhancement Measures in 2012, FSB Wales' preferred option was Highway Option C: Grade separated junction improvements to the A48 SDR as set out in Welsh Government's 2012 consultation M4 Corridor Enhancement Measures Magor to Castleton (M4 CEM) Easing the Flow. This option minimises environmental impact while supporting sustainable economic development across the South East Wales region. Even within this option, we would prefer to see greater use made of the Steelworks Access Road which would provide a line directly from junction 28 to 23a. This would significantly increase the resilience of the network whilst dealing with some of the capacity issues between Castleton and Magor. In times of constrained public expenditure, FSB Wales feels that this is a practical and affordable measure that would bring lasting benefit, not only to the users of the M4, but the outlying communities that surround Newport.

Borrowing powers and tolls

Given that there is much consensus on the need to reduce tolls and to support infrastructure development across Wales, we feel that any attempt to fund a relief road using Severn Crossings tolls is flawed and does not represent an efficient and effective use of income. The issue of the need for an M4 relief road should be treated separately to that of the future of revenue from the Severn Crossings. The concession period for the Severn Crossings is limited to 30 years, although we recognise that the Secretary of State has powers under the Severn Bridges Act to levy tolls for a maximum of 35 years. The actual end date of the concession will be achieved when Severn River Crossings has collected a fixed sum of money from tolls and current predictions suggest that this will be 2018 (Written evidence from Welsh Government to Welsh Affairs Committee, SCT 03, June 2013). It is noteworthy that the predicted endpoint of the concession varies and has been put back on numerous occasions. This tolling period could be extended by up to five years to recoup UK Government losses. In 2012, research by Welsh Government suggested that the concession could come to an end in around 2017 (Welsh Government, *The Impact of the Severn*

Tolls on the Welsh Economy, 2012). As it is currently accepted that this is now likely to be 2018, this suggests that the amounts collected via Severn Crossings tolls are decreasing and would not represent a stable base on which to predicate any future Welsh Government borrowing powers.

We would seek clarification as to whether the UK Government will continue to maintain tolls after the end of the concession as recent estimates hold that this debt is around £88 million. A basic calculation suggests that this will require a further two years of tolling. Clarification on the current stage of negotiations is now urgently required as the Welsh Government has argued that it should make any decisions on future tolls and has stated its desire to both lower the tolls and collect additional income to fund infrastructure improvements. Given that a 2010 report estimated the running costs of the crossings to be £15M with a yearly income of £72M (Welsh Affairs Committee, *The Severn Crossings Toll*, 2010), FSB Wales does not believe that it is possible to reduce the tolls and also use future income to fund an M4 relief road, estimated to cost £1BN. Such a plan also contravenes efforts to reduce carbon emissions and undermines environmental principles by making economic and infrastructure development dependent on increased vehicle use.

Commission on Devolution in Wales

As stated in our response to the Commission on Devolution in Wales, FSB Wales wishes to see full and unequivocal support from the UK and Welsh Governments for the tax and borrowing recommendations proposed by the Commission on Devolution in Wales ('Silk Commission') in order to address the issue of funding of major infrastructure projects. We are also of the opinion that clarity, transparency, and ultimately accountability are at the heart of these recommendations. We urge an imminent response from the UK Government to this Commission and note that the delay already apparent in this respect is causing confusion, obfuscation and general uncertainty. Such a state of affairs is detrimental to business, potentially limiting infrastructure investment in Wales and generally liable to compound the historic poor performance of the economy of Wales. The current state of impasse between the Welsh Government and the Wales Office cannot continue. We are also patently aware that the need to improve elements of infrastructure in Wales is likely to require financial support from the UK-wide budget as is the accepted case for rail electrification.

Wales and UK collaboration

It is vital that decisions about major cross-border infrastructure projects are undertaken collaboratively between the Welsh and UK Governments and not in isolation by either. There is clear evidence that in terms of projects such as the electrification of the main line to Swansea and in the very welcome commitment to electrification of the Valleys line that cooperation and collaboration can only benefit the communities of Wales. However, in reflecting on the course of the recent Commission on Devolution in Wales, we cannot conclude that future collaboration can be taken for granted. On a practical note, we wish to see greater involvement of the Welsh Government with Infrastructure UK with the aim of integrating the Wales elements into a UK-

wide plan reflecting the UK's long-term infrastructure priorities. While major projects would benefit from both management and investment at a UK level, FSB Wales does not feel that this is incompatible with decisions being ultimately made by those most likely to have a detailed understanding. Currently, we feel that in the case of the M4 and the Severn Crossings this means decisions should rest with the Welsh Government. However, given recent announcements on the prospective use of tolls, it is clear that this is a qualified position.

Ultimately, FSB Wales seeks clarity on the future of the revenue from the Severn Crossings and the UK Government's response to the Commission on Devolution in Wales. Without this, we fear that the ongoing discussions around such significant projects will continue to be mired by confusion and poor thinking.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Janet Jones'.

Janet Jones
Wales Policy Chair
Federation of Small Businesses



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Rt Hon Carwyn Jones AM
First Minister
Welsh Government
5th Floor, Tŷ Hywel
Cardiff Bay
CF99 1NA

09 September 2013

Dear First Minister,

Severn Crossings tolls and proposed M4 relief road

During recent weeks and months there has been considerable speculation over the future of the tolls on the Severn Crossings, the M4 relief road and the much awaited response by the Secretary of State for Wales to the recommendations made by the Commission on Devolution in Wales. As a result our Policy Unit has discussed each of these issues in isolation and within the context of the wider debate on infrastructure, fiscal autonomy and the current plan for economic development.

The Welsh Policy Unit of the Federation of Small Businesses has engaged wholeheartedly with all these policy considerations and in the interests of transparency and with a desire to ensure clarity and I have the pleasure in enclosing on their behalf a copy of the FSB Wales correspondence with the Secretary of State for Wales, the Right Honourable David Jones MP.

Our letter makes three main points:

- The level of tolls levied on vehicles using either of the Severn Crossings should decrease at the earliest opportunity in order to remove a barrier to cross border trade and economic growth. It also points out that in our opinion the future toll revenue is an insufficient and unreliable source upon which to predicate borrowing for infrastructure;

- The letter explains that FSB Wales accepts the need to maintain tolls to fund the maintenance of the Crossings but that any future tolls should be limited solely to covering the costs of maintenance and specifically those costs directly associated with maintaining the Severn crossings and not the ordinary costs associated with maintaining the highways. We also point out that we are currently of the opinion that the management of the tolls should be devolved to Wales;
- The UK Government's delay in responding to the first part of the Commission on Devolution in Wales is in our opinion causing uncertainty and having a negative impact on the Welsh economy.

During our participation at the Council for Economic Renewal we have been assured that toll income will not be used to fund an M4 relief road, and are keen to reiterate our support for the principle of borrowing powers being extended directly to the Welsh Government. This clearly requires alternative sources of revenue and you will no doubt be aware that our submission to the Silk Commission has supported this.

In addition in our response to the UK Government's consultation on the future of Stamp Duty Land tax that we once again have lent our support to the call for further devolution of powers to the Welsh Government. We are mindful that your government has accepted the principle of the full and complete devolution of Non Domestic Rates to Wales in response to the Non Domestic Rates review.

My colleagues and I look forward to hearing positive developments in respect of the future of devolution in Wales that help resolve the current state of impasse. We would also appreciate your response to the question of toll income from the Severn Crossings should its administration be devolved to Wales.

Yours sincerely,



Janet Jones
Wales Policy Chair
Federation of Small Businesses

1. Thank you for the opportunity to respond to the National Assembly for Wales Environment and Sustainability Committee review of the M4 Corridor Enhancement Measures. We are pleased to provide our views on the process and proposals to date.
2. Sewta is the alliance of local authorities charged with developing transport policy and delivering transport projects on behalf of the 10 local authorities in South East Wales and their partners, both in the transport industry and in organisations representing users' interests.
3. Sewta's membership includes the local authorities of Blaenau Gwent, Bridgend, Caerphilly, Cardiff, Merthyr Tydfil, Monmouthshire, Newport, Rhondda Cynon Taff, Torfaen and the Vale of Glamorgan. Partners are the Confederation of Passenger Transport, Arriva Trains Wales, Network Rail, Bus Users UK, Passenger Focus and Sustrans. Sewta works closely with the Welsh Government.
4. The M4 Motorway is a key element of the national and regional transport network, with a significant influence on travel patterns and economic performance. Accordingly, Sewta places great importance on engagement in the process to review existing provision and address known issues.
5. For the purposes of our response we have identified two distinct elements in the M4 proposals consultation and engagement processes:
 - A. Original schemes consultation June and July 2012 (four highway options comprising, widening existing M4, two options to revise the Southern Distributor Road, and a new dual carriage way to the south of Newport, with common public transport elements); and
 - B. Revised Scheme published 23rd September 2013 (3 highway options to the south of Newport)
6. The reason for this distinction is that there are significant differences each element in terms of Sewta engagement and the proposals themselves.

The Original Scheme

7. Sewta was an active member of the M4 CEM consultation group, attending a series of meetings facilitated by the consultants. Initial proposals did not include adequate regard to the role and potential of public transport in relieving congestion at key junctions and facilitating regional movements. Increased use of alternative modes would reduce pressure on existing assets and assist achievement of environmental targets. Sewta considered a holistic approach to consider all modes of transport along the corridor an essential element of the M4 CEM project scope.

8. Following discussions, further work was undertaken by the consultants to identify a series of public transport measures, which were included in the public consultation exercise.
9. There was also a concern that some of the highway options as proposed would have a negative impact on the transport network in Newport itself. In particular the closure of some junctions, whilst assisting the flow of traffic on the line of the M4 itself, would increase congestion on the approaches. There are a number of locations already designated Air Quality Management Areas, and there was a concern existing air quality issues would be exacerbated.
10. Following approval at the July 2012 Sewta Board meeting, a written response was submitted to the first formal M4 CEM consultation, which outlined a number of concerns (full response contained in Appendix A). These are summarised as:
 - a. The body of information available as part of the consultation constrained the conclusiveness of the response.
 - b. Data currency – much of the data was several years old, and was unlikely to reflect current trends;
 - c. Scope of Modelling – limited information available on the implications of the alternative options proposed on transport networks beyond the boundaries of the study area;
 - d. Option Appraisal – key concerns regarding the accuracy of the conclusions reached;
 - e. Appraisal of Public Transport Alternatives – the study made only limited use of a wide body of available information, which would have generated a more robust appraisal of the contribution achievable from public transport investment.
11. The Welsh Government then undertook further public consultation regarding the Strategic Environmental Assessment, Health Impact Assessment and Equality Impact Assessments.
12. Following Sewta Board approval, a further response was submitted to the Welsh Government consultants (Appendix B). In summary, key concerns were:
 - a. The geographical scope doesn't fully consider the regional impact of measures
 - b. The contribution of existing public transport assets to achieve scheme outcomes was not adequately considered
 - c. Proposals didn't take account of the requirement to provide appropriate infrastructure to support and facilitate behavioural change
 - d. The impact appraisal contained a number of anomalies
13. Each of our responses outlines a number of concerns regarding the scope, data and appraisal of the scheme.

B – Current Scheme Proposals

14. Following consideration of the original consultation proposals, revised proposals have been developed. These were publically released for consultation on the 23rd September 2013, with Sewta being invited to respond.
15. Sewta has not been actively engaged in the development of these revised proposals; therefore this is the first opportunity to fully consider them. The timescale is commensurate with the cycle of Sewta Board and Directorate meetings; however there is a considerable amount of information to be considered, which presents a challenge to fully appraise the proposals in the timescale.
16. Whilst our full response is being prepared, there is an initial concern that the separation of the public transport elements from the M4 project and removes consultation upon it, removes the commitment of the original proposals to provide additional public transport provision to reduce dependence on the private car and contribute to Welsh Government and Sewta climate change objectives. We will provide a copy of our formal response, once available.
17. Given the substantial revision to the proposed scheme and the removal of public transport elements, our previous consultation response represents the most up-to-date assessment in the public domain of the role of non-highway options to delivering scheme outcomes. It is disappointing that, in the current consultation, consultees are not able to offer views on the full range of transport alternatives available.
18. In summary, whilst Sewta fully supports measures to improve the transport network to support economic development and social inclusion, there is a concern that the current proposals underplay the potential of alternative modes to contribute towards these objectives. It is therefore very difficult for consultees to offer rounded advice on the most appropriate mix of transport investment to achieve economic and environmental objectives while delivering value for money.

Appendix A

M4 Corridor Enhancement Measures Programme – Consultation

Sewta Response

About Sewta

1. **Sewta** is the alliance of local authorities charged with developing transport policy and delivering transport projects on behalf of the 10 local authorities in South East Wales and their partners, both in the transport industry and in organisations representing users' interests.
2. Sewta's membership includes the local authorities of Blaenau Gwent, Bridgend, Caerphilly, Cardiff, Merthyr Tydfil, Monmouthshire, Newport, Rhondda Cynon Taff, Torfaen and the Vale of Glamorgan. Partners are the Confederation of Passenger Transport, Arriva Trains Wales, Network Rail, Bus Users UK, Passenger Focus and Sustrans. **Sewta** works closely with the Welsh Government.
3. Sewta welcomes the opportunity to respond to the Welsh Government's consultation on the M4 CEM Programme. Sewta's response draws heavily on the Regional Transport Plan, which is the statutory Transport Plan for South East Wales. It was approved by Sewta in March 2010, and has been endorsed by the Welsh Government.

Sewta's Consultation Response

4. Having been prepared by the regional transport consortium, this response is driven primarily from a regional perspective. Individual authorities will be responding from their own perspectives, and will address concerns of a more local nature. Every effort has been made to respond fully to the consultation questions. However, the body of information available as part of this consultation has constrained the conclusiveness of this response. These issues are dealt with in more detail in the body of the response. Key concerns include the following:
 1. Data currency – much of the data is several years old, and is unlikely to reflect current trends;
 2. Scope of Modelling – there is little information available on the implications of the alternative options proposed on transport networks beyond the boundaries of the study area;
 3. Option Appraisal – there are key concerns about the accuracy of the conclusions reached;
 4. Appraisal of Public Transport Alternatives – the study has made only limited use of a wide body of available information, which would have generated a more robust appraisal of the contribution achievable from public transport investment.

Consultation Questions

Question 1a: In your opinion, which of the transport related problems listed are the most important for the Welsh Government to address with the M4 CEM programme?

Question 1b: Would you like to make any other comments on the traffic related problems which should be addressed by the M4 CEM programme?

5. The consultation document lists 17 transport-related problems. It invites respondents to prioritise a maximum of four. Within the list of problems there are some general issues that apply to the whole corridor, whilst some are location specific. Those considered to be most pertinent at a regional level (shown in bold below) are identified in this response for prioritisation:

Capacity

1. **A greater volume of traffic uses the M4 around Newport than it was designed to accommodate, resulting in regular congestion at peak times over extended periods.**
2. The M4 around Newport is used as a convenient cross town connection for local traffic, due to insufficient local road capacity.
3. HGVs do not operate efficiently on the motorway around Newport.
4. There is insufficient capacity through some of the junctions (e.g. 3 lane capacity drops to 2 lane capacity).
5. The 2-lane Brynglas tunnels are a major capacity constraint.
6. The M4 cannot cope with increased traffic from new developments.

Resilience

7. Difficulties maintaining adequate traffic flows on the M4 and alternative highway routes at times of temporary disruption; alternative routes are not able to cope with M4 traffic.
8. The road and rail transport system in and around the M4 corridor is at increasing risk of disruption due to extreme weather events.
9. **When there are problems on the M4, there is severe disruption and congestion on the local and regional highway network.**
10. The M4 requires essential major maintenance within the next 5-10 years; this will involve prolonged lane and speed restrictions, thus increasing congestion problems.
11. There is insufficient advance information to inform travel decisions when there is a problem on the M4.

Safety

12. The current accident rates on the M4 between Magor and Castleton are higher than average for UK motorways.
13. The existing M4 is an inadequate standard compared to modern design standards.
14. Some people's driving behaviour leads to increased accidents (e.g. speeding, lane hogging, unlicensed drivers).

Sustainable Development

15. **There is a lack of adequate sustainable integrated transport alternatives for existing road users.**
16. Traffic noise from the motorway and air quality is a problem for local residents in certain areas.
17. **The existing transport network acts as a constraint to economic growth and adversely impacts the current economy.**

Key Problems

6. The key problems are clearly the congestion, safety and maintenance issues of the current M4 around Newport. The main underlying cause of the overload of the M4 is that not enough journeys are made using alternatives. For many existing road users along this motorway section,

there is a current lack of adequate sustainable integrated transport alternatives. Many of the journeys are local journeys, and these would be the journeys with the greatest potential for modal shift were adequate alternatives available.

Rail Alternatives

7. In terms of lack of alternatives, there is in particular a lack of convenient accessibility to the rail network for local journeys in proximity to Newport. While the rail lines are in place, there are few stations on the network around Newport, and the frequency and convenience of services to cater for local journeys is restricted. In the case of the line from the Ebbw Valley to Newport, there are no services at all. This limited sub-regional network of rail services linking the journey to work area with Newport, puts great pressure on the M4 for many local journeys. The success of the Ebbw Valley line to Cardiff illustrates the potential to remove car journeys from critical areas of the highway network where an attractive alternative is provided.

The Local and Regional Highway Network

8. The consultation document highlights the proliferation of congestion issues that affect Junctions 26, 27 and 28. These cause considerable impacts on strategic access routes, including the A48 from St Mellons, the A468 from Caerphilly, the A467 / B4591 from Cross Keys, the A4051 from Cwmbran and the A4042 from Pontypool. However, congestion at these junctions is also a major cause of congestion on the M4 itself. Local and regional traffic is a major contributor to congestion on the M4, but equally, congestion on the M4 is a major contributor to congestion on the local and regional road network. This underlines the limitations of seeking to address the problems of the M4 without equally seeking to tackle issues on the adjoining network. There is a serious risk that enhancing motorway capacity without addressing local network issues will exacerbate existing problems on the local network.

Bus Alternatives

9. These concerns and risks are particularly pertinent to the bus network. Congestion on the motorway and at its junctions has a seriously adverse effect on journey times and reliability for bus passengers, and restrains the attractiveness of the bus as a modal alternative for local and regional journeys. The bus corridors from Cardiff, Cross Keys and Cwmbran are recognised within the Regional Transport Plan as strategic corridors for bus priority, and any measures proposed through the M4 CEM programme affecting junctions 26, 27 & 28, and adjoining junctions on the local and regional road network, need to be able to demonstrate their benefits for bus users.

Smarter Choices

10. Given the extent of local journeys on the M4, measures like the completion of the strategic cycle network for Newport, the introduction of personalised travel planning, and the inclusion of Newport within the Sustainable Travel Centres programme, can all contribute to increasing the availability of sustainable travel alternatives to the car. It is surprising that the issue of the carbon emissions generated by users of the M4 is not identified as one of the strategic problems which the programme needs to address, given the recognition of carbon emissions as one of the strategic priorities within the Wales Transport Strategy.

Sewta Metro Plus

11. The facilitation of economic growth is a key function of the strategic transport network. The creation of a networked City Region which harnesses the economic potential of the M4 corridor

requires accessibility throughout the region. An effective M4 CEM Programme has the potential to stimulate the economic growth of the region. The development of public transport alternatives, including the Sewta Metro Plus concept, will help to reduce dependency on the M4, whilst also facilitating economic development. It will be essential that the Metro proposition embraces the whole Newport journey to work area, in order to play its full role in helping to alleviate the problems of the M4.

Traffic generated by New Developments

12. A key contributor to the levels of existing congestion on the M4 has been the extent of new high intensity development which has taken place close to motorway junctions, particularly in generating local journeys. It will be essential as part of the M4 CEM programme that measures are taken to provide strategic guidance to local planning authorities which inhibits further developments of this nature from gaining planning consent.

The Wider Strategic Highway Network

13. While the focus of the programme is the M4 between Magor and Castleton, there is a concern that the impacts of the enhanced traffic flows achieved by the proposed highway options, on highway networks beyond this length of the motorway, do not appear to have been modelled or evaluated. As well as the principal road network around Newport, there are also concerns at the potential impact on strategic junctions further east and west. Key issues will be the impact of increased flows on the 2-lane section at Jct 23 Magor, on J32, Coryton, and on the junctions on the A48 in Cardiff. Capacity improvements between Magor and Castleton are likely to increase the rate at which vehicles arrive at these junctions, exacerbating the 'bottleneck' effect, and constraining the overall benefits of the proposed enhancement measures.

Data Currency

14. The Sewta response is based on the information contained within the Consultation Document. However, we have fundamental concerns that the data utilised is five years old, and therefore is an unreliable basis on which to evaluate alternative options. It does not take account of the impact of M4 Making Better Use measures (including the Managed Motorway between junctions 24 and 28) or the impact of increasing fuel prices and other factors on rates of road traffic growth. There is a pressing need for an update on the current position regarding key issues such as congestion, journey time / reliability and safety, before any decisions are taken to commit funding.

Question 2a: In your opinion, which of the goals listed are the most important for the Welsh Government to achieve with the M4 CEM Programme?

Question 2b: Would you like to make any other comments on the goals of the M4 CEM Programme?

15. The consultation document lists 15 goals; a maximum of four should be prioritised. Those considered to be most pertinent at a regional level (shown in bold below) are identified in this response for prioritisation:

1. Safer, easier and more reliable travel east-west in South Wales.
2. **Improved transport connections within Wales and to England, the Republic of Ireland and the rest of Europe on all modes on the international transport network.**
3. **More effective and integrated use of alternatives to the M4, including other parts of the transport network and other modes of transport, for local and strategic journeys around Newport.**
4. Best possible use of the existing M4, local road network and other transport networks.
5. More reliable journey times along the M4 Corridor.
6. **Increased level of choice for all people making journeys within the transport corridor by all modes between Magor and Castleton, commensurate with demand for alternatives.**
7. Improved safety on the M4 Corridor between Magor and Castleton.
8. Improved air quality in areas next to the M4 around Newport.
9. Reduced disturbance to people from high noise levels, from all transport modes and traffic within the M4 Corridor.
10. Reduced greenhouse gas emissions per vehicle and/or person kilometre.
11. Improved travel experience into South Wales along the M4 Corridor.
12. An M4 attractive for strategic journeys that discourages local traffic use.
13. Improved traffic management in and around Newport on the M4 Corridor.
14. **Easier access to local key services and residential and commercial centres.**
15. A cultural shift in travel behaviour towards more sustainable choices.

Improved Strategic Transport Connections

16. The goals of the M4 CEM Programme are generally aligned with those of the Sewta RTP and, subject to the comments below, are broadly supported. Given the strategic location of this section of the M4 Corridor, it has a critical part to play in improving strategic connectivity for the majority of the population of Wales. There is a need to link the goals more explicitly, however, to the social, economic and environmental goals of the Wales Transport Strategy.

Sustainable Alternatives

17. As the key underlying problem is a lack of sustainable alternatives, primary goals should focus on more effective availability and use of such alternatives. The M4 would then be able to cope better with its primary intended function of providing long-distance strategic connectivity.

Access to Services

18. Better access to local vital services, and especially centres of key settlements, is a core objective of the Wales Spatial Plan and the Regional Transport Plan. Given the scope of the M4 CEM programme, improving accessibility to Newport City Centre needs to be seen as a key strategic goal.

Discouraging Local Traffic on the M4.

19. In respect of goal 12, there is a concern that the local highway network already experiences significant congestion. Accordingly, the removal of 'local' movements from the M4 would be detrimental to the local highway network without appropriate mitigation measures and effective alternatives.

Reduced Greenhouse Gas Emissions

20. There are major concerns at the way in which goal 10 is defined. At a time when organisations are being pressed to profoundly reduce absolute levels of greenhouse gas emissions, a goal of reducing them per vehicle or per person kilometre, could see options complying with that goal while substantially increasing absolute levels of emissions, as a result of increased traffic flows. The goal needs to be redefined as “Reduced greenhouse gas emissions,” and options need to be evaluated in terms of their compliance with this goal, or the extent to which they fail to comply. A goal thus defined should be one of the top priorities for the programme.

Strategic Fit

21. It is not clear from the consultation document, how the proposed goals fit with higher order strategic goals. It would therefore be helpful if the relationship between the proposed goals and the Wales Transport Strategy’s outcomes and key themes, the Wales Spatial Plan themes, and the WelTAG objectives is made more explicit. This could be captured in the form of policy linkage tables.

Question 3a: Which of the public transport measures listed do you think would make the best contribution to relieving traffic on the M4? (Select all that apply, suggested priorities highlighted)

Question 3b: To what extent do you think the public transport measure(s) you have selected will address the problems and achieve the goals you have chosen?

Consultation Document Public Transport Proposals

22. The consultation document includes the provision of a package of public transport measures, worth £300m of capital investment, and a further £200-300m in ongoing support over 60 years. These are:

- Additional mainline train services between Swansea, Cardiff, Newport and Bristol;
- Additional train services on local routes;
- More stations with park and ride facilities;
- More bus/train connecting services;
- Additional express bus/coach services between Cardiff, Newport and Bristol;
- Additional local bus services around and across Newport.

23. The document advises that all that apply should be identified. Clearly all of these could make a contribution to relieving traffic on the M4. Furthermore, if these measures were implemented together as a package then their effect would be much greater than for any one measure on its own. However, it is evident that the range of measures evaluated is limited and is indicative only, and the level of evaluation and information provided on each element is superficial. Neither the assessment of the package costs nor of its benefits is robust, and as a result any comments upon it will be of limited value. Accordingly, it is not possible to assess the merits of the public transport proposals against those of the highway infrastructure proposals. However, it is difficult to understand how the package of public transport measures is assessed, in the appraisal of options, as making a lesser contribution to the effective use of alternatives than that of two of the highway options.

24. The proposed package of public transport measures misses the opportunity to significantly enhance the regional public transport network, which will assist better utilisation of existing assets. It is noted that the public transport measures is described as outside current funding commitments. An integrated package of measures is needed for the public transport measures to provide a credible set of alternative options for journeys.

Public Transport Modal Share

25. The consultation document indicates that a review of the public transport investment package set out in para 21 above concluded that it could reduce traffic on the M4 around Newport by about 3%, and a modal share increase for public transport from 7% to 11%. Accordingly, it argues that the investment in public transport could not alone achieve the goals of the M4 programme.

26. This is difficult to accept, given the indicative nature of the package. With the public transport modal share experienced in other comparable city-regions, it would be possible for a public transport network such as that proposed in the Regional Transport Plan and the Regional Rail Strategy, and captured in the Metro proposals, including electrification, to lead to a step change in behaviour, contributing more substantially to the M4 CEM Programme goals.

Comprehensive Public Transport Alternatives

27. Overall, while the consultation document makes reference to electrification of the Great Western Mainline and the Valley Lines network, and existing National Transport Plan aspirations, there is a strong case for a more comprehensive package of public transport alternatives to be considered. While these will also contribute to a set of regional transport planning objectives which are wider than those of the M4 CEM Programme, there is the potential to achieve better value for money by taking an approach which integrates regional and M4 CEM programmes.

Regional Public Transport Proposals

28. The Regional / Metro public transport proposals, which should be considered in terms of their potential collectively to play a major role in achieving the goals of the M4 CEM Programme, include:

- Strategic bus priority corridors on the routes from Cardiff, Blackwood, Newbridge and Pontypool into Newport;
- A new bus interchange in Newport;
- New rail services from Ebbw Vale and Abertillery into Newport,
- Enhanced rail frequencies from Abergavenny, Chepstow, and Bristol into Newport.
- New rail stations at St Mellons, Coedkernew, Ebbw Vale Town, Crumlin, Pye Corner, Caerleon and Llanwern, mostly with park & rides
- New rail park & ride schemes at existing stations at Abergavenny, Pontypool, Chepstow and Severn Tunnel Junction
- A fully electrified rail network
- Faster journey times, full timetable and ticketing integration, and better information, to enable seamless travel from the point of view of the passenger.

Public Transport Deliverability

29. Many of these proposals have advanced well beyond concept and feasibility study stages, to include business case development, preliminary design and public consultation. Their costs, benefits and deliverability are generally well understood. Some schemes are already within funding programmes, and others in implementation. Some will be fundable through external

funding programmes. It is disappointing that this level of knowledge has not been fully accessed to provide a meaningful public transport package for evaluation as part of this programme.

Question 4a – 4d: To what extent do you think Highway Infrastructure Options A, B, C and D will address the problems and achieve the goals you have chosen?

Highway Option A

30. Highway Option A will provide an additional crossing of the River Usk, resulting in substantial additional highway network capacity and resilience. The additional capacity is greater than in options B and C, both of which would utilise the existing A48 Bridge. The estimated cost of this option is £830m.

31. In terms of providing improved long-distance connectivity this option would clearly have a major positive effect, especially if (as it appears in the consultation document) the new high quality road can be accessed at junctions 23 and 29 only. The assumption of no intermediate junctions may, however, be unrealistic, and these would add substantially to the costs.

32. The impact on local and regional accessibility from this option needs further assessment. There are substantial capacity issues around junctions 26-28 and along the roads leading to these junctions, leading to congestion and negative effects on the bus system and the local environment. There is a concern that Option A, without an effective public transport package, would have limited benefit for these issues, although it is likely that some of the junction congestion currently experienced around Newport would migrate westward to junctions around Cardiff. It is also noted that the route would sever existing and proposed cycle routes, and mitigation measures would be needed.

33. Implementation of Option A may offer the opportunity to implement bus priority measures in association with a fundamental review of the role of the existing M4. However, there is no evidence in the consultation document that these potential benefits have been considered in the evaluation.

34. Overall, the road user benefits arising from Option A in providing extra road capacity will need to be evaluated against the Wales Transport Strategy key outcomes and the Sewta RTP objectives, as it has the potential to lead to a modal shift away from sustainable modes. There would be a need for countervailing measures promoting sustainable transport.

35. It is noted that the WelTAG Appraisal of Option A assesses this scheme as having a neutral impact on greenhouse gas emissions. As with Options C and D, the statement in the appraisal that “it is not clear whether the additional road capacity would lead to an overall increase in emissions” is highly questionable. However, the estimated neutral impact arises from the inappropriate indicator used (see para 19 above). It is difficult to accept that this option would have an equivalent neutral impact on greenhouse gas emissions as Options B, C and D. The WelTAG appraisal needs to be revisited.

Highway Option B

36. Highway Option B would provide at-grade junction improvements along the existing Newport Southern Distributor Road (A48). The estimated cost of this option is £45m. While it would

improve the performance of the corridor in times of severe problems on the existing M4, the signalisation of these junctions will not attract through traffic off the M4 or movements that join the motorway along junctions 25-28. Therefore this option is likely to have the least impact on achieving the broader goals and aims of the project.

37. Furthermore, there is a concern that the implementation of at-grade measures to prioritise traffic on the A48 would be detrimental to local movements into the centre of Newport from the south and east, including cycleway links, and would increase severance effects. In order to avoid adverse effects on the reliability of local bus services that use these junctions, suitable bus priority measures would need to be included.

38. The requirement to utilise junctions 24 and 28 will add pressure on these roundabouts, which are already heavily congested. The consultation document does not appear to show any enhancements to these junctions, so it is important to understand what mitigation measures will be employed, including measures to improve bus journey times and reliability, as these roundabouts are used by a number of regional bus services.

39. There are a number of travel generators located on the east side of the SDR (including a number of schools and retail facilities). Given the predicted increase in vehicle flows, it would be imperative to provide safe routes to and from these facilities.

40. It is difficult to accept that this option would have an equivalent neutral impact on greenhouse gas emissions as Options A, C and D.

Highway Option C

41. Highway Option C is generally similar to option B, but with the provision of grade separated junctions. The estimated cost is £300m. In general, the route related issues identified under Option B will also apply to Option C.

42. Of the two, Option C is a better option in terms of providing resilience and capacity improvement for through traffic as the grade separation will provide a more attractive route for strategic traffic. There is a concern, however, that these benefits will be constrained by the capacity of key interchanges at Junctions 28 and 24 without their modification, which would need to include bus priority measures.

43. A further concern regarding this option is the impact of the grade separation on the local environment and transport network. It has the potential for adverse implications for adjoining communities. There would also be a need for the revised junction arrangements to provide bus priority, cycleway linkages and safer pedestrian routes to mitigate potential increases in traffic.

44. As the option does provide some more substantial additional highway capacity, the concerns outlined in Option A (namely that these will lead to increases in road traffic without substantial mitigation measures) also apply.

45. As with Options A and D, the statement in the appraisal that “it is not clear whether the additional road capacity would lead to an overall increase in emissions” is highly questionable. It

is difficult to accept that this option would have an equivalent neutral impact on greenhouse gas emissions as Options A, B and D.

Highway Option D

46. Option D proposes the provision of a dual 4-lane motorway between junctions 24 and 29, along the existing M4 route. The estimated cost is £550m. This will provide a substantial increase in capacity along the current route and remove the current bottleneck at the Brynglas Tunnels, by providing an additional tunnel.

47. The main drawback of this option is that the additional capacity of the M4 would lead to additional pressure on the routes leading to the motorway (i.e. A48, A468, A467, B4591, A4051 and A4042) – and these are already suffering from congestion and negative environmental effects. Without expensive mitigation measures it is likely that congestion, noise, air pollution, etc will increase substantially along the M4 corridor and the routes leading to it. The reliability of the local / regional bus network would also require substantial bus priority investment.

48. As with Option A, Option D would have a clear positive effect in terms of providing improved long-distance connectivity. Also as with Option A, the additional highway capacity will lead to a sustained overall increase in traffic, and knock-on effects on the local / regional highway network, and on roads and junctions towards Cardiff. A substantial investigation into such potential side-effects is essential to understand the benefits and costs of this option.

49. There is a concern that this option is the most difficult to construct, with a risk of reduced capacity and possible closure for significant periods.

50. As with Options A and C, the statement in the appraisal that “it is not clear whether the additional road capacity would lead to an overall increase in emissions” is highly questionable. It is difficult to accept that this option would have an equivalent neutral impact on greenhouse gas emissions as Options A, B and C.

Question 5: Have you any additional comments to make regarding how to address the travel related problems occurring in the M4 Corridor, Magor to Castleton?

Funding

51. Information in the consultation document on the deliverability of the alternative options is very limited. It is evident that, with the exception of Highway Option B, the scale of the funding required will present major challenges. Highway Options A, C & D are in the range £300m to £830m. The Welsh Government, with whom lead responsibility properly rests for the M4 CEM programme, will need to ensure that the programme represents value for money, and that all relevant funding programmes are brought into the scope of the programme. There will be a need for a wide range of stakeholders to also play a role, and closer partnership working will be needed. Funding sources beyond those which would conventionally be considered for investment of this nature will need to be identified.

Delivering Progress in the Short to Medium Term

52. However the funding challenges are addressed, the scale of the programme indicates that the lead in time for major highway options in particular is likely to be lengthy. There will be a need for

measures to be taken in the interim which will help to address the situation where any increases in highway capacity will not be deliverable for a number of years. While demand management can play a role, and needs to be more effectively considered, investment in rail, bus, cycling and smarter choices programmes becomes not an option but a necessity.

Aligning the M4 CEM Programme with Broader Transport and Land Use Planning

53. It is important that the proposals for the M4 CEM Programme are effectively integrated with those for the broader region. The implications of the M4 CEM options for transport networks beyond the scope of the programme need to be fully understood. A key factor which also needs to be taken into account is the potential for changes in toll levels on the Severn Bridge, which could have profound implications for traffic flows and levels of congestion on the M4.

54. There is also a pressing need to align the objectives of transport planning and spatial / land use planning along the M4 corridor. It will be essential in seeking to achieve lower congestion levels that new development is concentrated in locations which can be effectively accessed by public transport, and that further development in locations which would be heavily dependent on access by private car, particularly in close proximity to M4 junctions, is avoided. There is a case for a review of the guidance offered by Welsh Government Planning Policies to local planning authorities on their Development Plans, to reflect the goals of the M4 CEM Programme. Work on developing a regional planning framework should have similar regard to these goals.

Summary of Key Comments

- 1. Economic Growth** - Enabling economic growth is a key function of the transport network. A networked City Region, which harnesses the potential of the M4 Corridor, requires accessibility throughout the region. An effective M4 CEM Programme can stimulate the economic growth of the whole region.
- 2. Key Problems** – These are clearly the congestion, safety and resilience issues of the current M4 around Newport. For many existing road users along this motorway section, there is a lack of sustainable transport alternatives. Many journeys are local, and these would have the potential for modal shift were adequate alternatives available.
- 3. Programme Goals** - The goals of the M4 CEM Programme are generally aligned with those of the Sewta RTP and, subject to the comments in this response, are broadly supported, although the definition of the carbon reduction goal is questioned. This section of the M4 Corridor, has a critical part to play in improving strategic connectivity for Wales.
- 4. Congestion Impacts on the Wider Network** - There is concern that the impacts of the enhanced traffic flows achieved by the proposed highway options, on highway networks beyond this length of the motorway, do not appear to have been modelled or evaluated. As well as the road network around Newport, there are also concerns at the impact on strategic junctions further west and east. Key issues will be the impacts on J32, Coryton, on the junctions on the A48 in Cardiff, and on the 2-lane section of the M4 at Jct 23 Magor.
- 5. Public Transport Measures** -There is a strong case for a more comprehensive package of public transport alternatives. Better value for money can be achieved by integrating regional and M4 CEM programmes. Many of the regional public transport proposals have advanced to design and public consultation. Their costs, benefits and deliverability are generally well understood.
- 6. Highway Option A** - In terms of providing improved long-distance connectivity, this option would have a major positive effect, especially if it can be accessed at junctions 23 and 29 only. The assumption of no intermediate junctions may, however, be unrealistic, and these would add substantially to the costs.

7. **Highway Option B** - This is likely to have the least impact on achieving the broader goals and aims of the project.
8. **Highway Option C** – This would perform better than Option B in terms of providing resilience and capacity improvement for through traffic. There is a concern, however, that these benefits will be constrained by the capacity of key interchanges at Junctions 28 and 24 without further investment in them.
9. **Highway Option D** - The main transport drawback of this option is that the additional capacity of the M4 would lead to additional pressure on the routes leading to the motorway, and these are already suffering from congestion and negative environmental effects. Without expensive mitigation measures, congestion, noise, air pollution, etc would increase substantially along the M4 corridor and the routes leading to it.
10. **Deliverability** - Information on the deliverability of the alternative options is very limited. The scale of the funding required will present major challenges. Highway Options A, C & D are in the range £300m to £830m. The Welsh Government will need to ensure that the programme represents value for money. Funding sources will need to be identified beyond those which would conventionally be considered.
11. **Investments in the Short to Medium Term** - The lead in time for major highway options is likely to be lengthy. There will be a need for measures in the interim. While demand management can play a role, substantial investment in rail, bus, cycling and smarter choices programmes is a necessity.
12. **Regional Integration** - The proposals for the M4 CEM Programme need to be effectively integrated with those for the broader region. The implications of the M4 CEM options for wider transport networks need to be fully understood. The potential for changes in tolls on the Severn Bridge, which could have profound implications for traffic flows and levels of congestion on the M4, will need to be taken into account.
13. **Co-ordination with Land use Planning** - It will be essential in seeking to lower congestion, that new development is concentrated where it can be effectively accessed by public transport, and that development in locations dependent on the car, particularly close to M4 junctions, is avoided.
14. **Data Reliability** - The body of information and appraisal available as part of this consultation is not adequate to enable conclusive decisions to be made.

Appendix B

Sewta response to M4 CEM SEA, HIA and EqIA Consultation

About Sewta

1. **Sewta** is the alliance of local authorities charged with developing transport policy and delivering transport projects on behalf of the 10 local authorities in South East Wales and their partners, both in the transport industry and in organisations representing users' interests.
2. Sewta's membership includes the local authorities of Blaenau Gwent, Bridgend, Caerphilly, Cardiff, Merthyr Tydfil, Monmouthshire, Newport, Rhondda Cynon Taff, Torfaen and the Vale of Glamorgan. Partners are the Confederation of Passenger Transport, Arriva Trains Wales, Network Rail, Bus Users UK, Passenger Focus and Sustrans. **Sewta** works closely with the Welsh Government.
3. Sewta welcomes the opportunity to respond to the Welsh Government's consultation on the M4 CEM Programme SEA, HIA and EqIA. Sewta's response draws on the Regional Transport Plan, which is the statutory Transport Plan for South East Wales. It was approved by Sewta in March 2010, and has been endorsed by the Welsh Government.

Sewta's Consultation Response

4. The following sections identify our comments regarding the Consultation document:

SEA Objectives

5. The importance of delivering a more carbon efficient transport with an increased emphasis on more sustainable modes is closely allied to the objectives of the Sewta Regional Transport Plan; therefore Sewta welcomes the amendment of SEA objective 2a to reduce the global level of transport related greenhouse gasses, replacing the per km/person criteria.

Scope/geographical coverage

6. Section 3.1.2 notes that the M4 CEM programme will have a wider geographical sphere of influence than the confines of the M4 between Magor and Castleton, including the potential to increase journeys in and around Cardiff. This has important ramifications for the regional transport network. Whilst it is appreciated that the majority of environmental impacts will be in and around the Newport area itself, there appears to be limited consideration of the impact or information related to those wider locations identified.

Policy context

7. Sewta welcomes the inclusion of the Regional Transport Plan and Rail Strategy within the list of relevant policies, plans and programmes

Baseline Information – Public Transport

8. Whilst there is a range of information within this section, there are a number of notable omissions. There are a number of bus and coach services that utilise the M4 corridor within the study area. These provide a foundation to provide more sustainable alternatives – particularly for city centre to city centre type trips, or the leisure market (such as travel to an airport) where public transport can offer a credible alternative. Services include:

- National Express Long Distance Coach Services
201 - Route South Wales Bristol to Heathrow Gatwick Airports
322 - Coaches between Nottingham, Leicester, Birmingham and South Wales
508 - Route Swansea West Wales to London
509 - Route Cardiff to London
- First Group
14 - Newport to Chepstow
- Stagecoach in South Wales
X3 – Cardiff – Pontypool – Abergavenny
- Megabus (operated by Stagecoach)
Cwmbran – Newport – Bristol – London
Swansea – Cardiff – Bristol – London

Cardiff Bus Network

9. The SEA notes the potential impact of the M4 in Cardiff; therefore we would also highlight the presence of park and ride services, particularly the Pentwyn Facility that could intercept a percentage of city centre traffic emanating from the M4. This facility has also expanded to provide a park and ride facility servicing Heath Hospital.

Cardiff Railway Network

10. There are a number of rail freight movements within the study area. These are summarised in Appendix B of the Sewta Rail Strategy. We would also identify Wentloog Rail Freight Terminal as a key element of the rail network.

Newport Bus Network

11. The majority of the Newport Bus network is commercial, with limited infill by supported services. The X30 also calls at Heath Hospital to provide an alternative to sections of the M4 for some users.
12. Shortcomings of the existing bus network include a lack of genuine 'express' buses, resulting in journey times greater than the private car. This is demonstrated by the success of the Ebbw Valley Line, which reduced the journey time by public transport between Ebbw Vale and Cardiff by half. This results in times competitive with the car and has removed a number of journeys at key congestion points on the M4, such as Junction 28, Tredegar Park.

Car Share

13. Although Sewta is responsible for administering the Sewta Car Share database, funding is provided by Welsh Government. We would also refer to the Cardiff Council Car Share database, which may intercept some M4 related journeys.

Cycling

14. In addition to the measures identified, National Cycle Network Route 4 also provides cycle links between Chepstow and Newport. The lack of a suitable, more direct cycle route between Newport and Cardiff is also a barrier to increased levels of cycling within part of the study area.

Road Freight

15. The use of the M4 by Heavy Goods Vehicles (HGV) is a major influence on levels of environmental impact. The Wentloog Rail terminal provides an opportunity to consolidate freight for local distribution. For example Tesco utilise a rail service from Daventry to supply the Magor Distribution depot.

Section 3.3.2.4 Key Issues

16. The final bullet point in this section notes the replacement of private car use by more sustainable modes is required but dependent on behavioural change. We would also note that infrastructure and service provision to facilitate and influence such behavioural change is also required.

Section 3.7.2.1 4th Paragraph

17. This section notes monitoring has identified an improvement in the M4 safety record following the implementation of safety initiatives. However, the quantum of improvement needs to be recorded.

3.7.2.2. Trends and future baseline

18. We would question the relevance of crime and anti-social behaviour statistics in the context of the SEA. This would be relevant to the EqlA in terms of barriers to travel to more vulnerable social groups.

3.12.2.1

19. Tredegar Park House is now run by the National Trust

Section 5.5, Table 8

20. Within the 'demand management' and 'Alternative travel modes and smarter sustainable choices' we would also wish consideration being given to measures to reduce the need to travel such as home working and video/teleconferencing.
21. Within the 'Alternative travel modes and smarter sustainable choices' category we would also include 'provide better/promotion of public transport'

Assessment Table Comments

Table 9 and 10

22. M4 CEM SEA objectives 1 and 2a relate to goals of improving air quality and reducing transport related greenhouse gases. It is therefore disappointing there is no assessment of these attributes for the highway elements. Sewta is concerned at the omission of these elements as they need to be key considerations within the SEA.
23. We also note table 10 has a neutral rating for public transport. This does not appear to incorporate improvements in emissions standards for public service vehicles, with an increasing number of vehicles in the fleet running at Euro 5 standard.

Table 12

24. Noise and vibration are key impacts for residents. We note no assessment has been undertaken for highway options A – C. We would also note, the SDR passes in close proximity to a number of residential areas that are likely to experience significant increases in noise and vibration.

Table 13

25. We would question the relative significance of the same rating for public transport and option D. Whilst there would be some impact arising from the construction of new public transport facilities, these are likely to be significantly less than the online widening of the M4 and construction of new tunnels at Brynglas and associated overbridges across the Usk.

Table 14

26. Sewta's response to the M4 CEM consultation highlighted concerns that options B and C would increase severance for some communities – for example, Ringland and Pill. The creation of grade separated junctions will require significant land take and will require the construction of bridges and slip roads. This will result in significant severance for those communities and require appropriate pedestrian and cycle facilities to minimise the impact.

Table 15

27. The SEA identifies the positive impact of more sustainable modes on health. We would question the same overall rating being applied to Option A.
28. Option B and C note there is likely to be an increase in vehicle flows on the SDR as movements transfer from the M4. The SDR is predominantly an urban highway, the majority of which is in close proximity to residential areas. We would therefore question the neutral rating applied to these options.

Table 16

29. The assessment for option D is slight adverse. Although the impact is likely to be lower than option A, it is likely to be significantly higher than option C, given the requirement to remove a significant amount of material from the Crindau Ridge.

Table 23 – Mitigation measures

30. Air quality– The use of alternative forms of propulsion (including public transport) should also be considered and referenced. For example the electrification of the South Wales Main Line and Valleys Lines will reduce emissions. The use of more sustainable modes will also provide a degree of mitigation.

Agenda Item 6

Env & SD Committee
Welsh Government
National Assembly for Wales
Cardiff Bay
Cardiff
CF99 1NA
18th October 2013

Dear Committee,

CALL FOR WRITTEN EVIDENCE: M4

I would like to thank you for holding an inquiry into this matter and also the opportunity to give evidence.

I would like to take this opportunity to express our deep concern about the environmental, economic and social impact of the M4 'Relief' road alternatively referred to as the Brynglas Tunnels bypass. We believe that this proposal is also contradictory to many Welsh Government commitments, policy and aspirations. Annex 1 gives more detail, however I have summarized our response below.

A motorway option was ruled out by the previous One Wales Government due to financial and significant sustainability issues. These issues have not been resolved.

Currently, the preferred route by the Welsh Government is a £1.2 billion motorway through the Gwent Levels Sites of Special Scientific Interest (SSSI) and the River Usk Special Area for Conservation (SAC) (see Annex 2). However, there are more sustainable alternatives that would address the capacity issues at a fraction of the cost e.g. upgrading the A48 and linking it and the Llanerwern Steelworks road to the M4 (see Annex 3). This would cost approximately £380 million and have significantly fewer environmental or impacts upon communities. This is just one of a number of solutions including greater public transport initiatives such as the South Wales Metro and measures to reduce local traffic on the M4 which accounts for 40% of congestion.

The new motorway proposed would cause significant loss of important and nationally and internationally protected habitats and species. This at a time when the Welsh Government has stated it is committed to halting the loss of biodiversity by 2020 and addressing the issues described in The State of Nature report. At the same time, **the new motorway would significantly increase Wales greenhouse gas emission through promotion of car use and the significant amount of embedded carbon dioxide in 15 miles of concrete.**

The ecosystem services that the Gwent Levels provide including flood protection is conservatively estimated at £67million per year and this new motorway would erode these services.

The Welsh Government and some others state that the traffic problems at the brynglas tunnels discourage investors and impact the economy while a new motorway would solve all investment and current economic problems. **However, no evidence for either claim has been presented.** In fact, we believe the contrary will occur, that Newport will lose out economically as it gives another reason for people to bypass Newport. Like the recent news about the HS2, the Welsh Government should provide an independent, peer reviewed business case for the road that also assesses the winners and losers of this scheme. This report should also include an assessment of the loss of ecosystem services that the proposal would create.

The proposals are also contradictory to a number of Welsh Government duty's, policies or commitments such as

- Putting sustainability at the heart of their decision-making processes
- taking an ecosystem approach
- halting the loss of biodiversity
- tackling the causes of climate change and reducing greenhouse gas emissions by 3%



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gan Warant Rhif: 3032775

Wildlife Trusts Wales is a
Registered Charity: 104567
and a Company Limited by
Guarantee: 3032775

Gwarchod **Bywyd Gwyllt** ar gyfer y Dyfodol
Protecting **Wildlife** for the Future

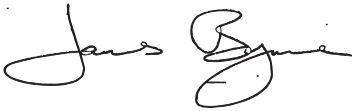
per year in areas of devolved control such as transport

Therefore, with climate change, loss of biodiversity and challenging economic times being such a pressing issue, it would be a backwards step if the Welsh Government have chosen to back the worst option from an environmental, economic and social perspective. **Choosing an alternative option(s) that are cheaper, more sustainable and don't have detrimental impacts on the environment is just a no brainer!**

I hope that the Committee will ask the Ministers whose portfolios are impacted by this proposal, to give evidence such as planning, transport, tackling poverty, active travel, ecosystem services, health and sustainable development.

I confirm that I am happy for this response to be made public and that I am happy to discuss this response in more detail with the committee.

Yours

A handwritten signature in black ink, appearing to read 'James Byrne', written in a cursive style.

James Byrne
Living Landscapes Advocacy Manager

ANNEX 1

CALL FOR WRITTEN EVIDENCE: M4

1. Wildlife Trusts Wales (WTW) is the umbrella organisation for the six Wildlife Trusts in Wales – Brecknock, Gwent, Montgomeryshire, North Wales, Radnorshire and South and West Wales (hereafter referred to as the 'Wildlife Trusts') working together in partnership to achieve a common aims. The Wildlife Trusts collectively speak on behalf of more than 28,000 members and manage over 200 nature reserves, covering more than 6,000 hectares of prime wildlife habitat, from rugged coastline to urban wildlife havens.
2. Wildlife Trusts strive for a **Living Landscapes** and **Living Seas**, recognising this as an inspirational end point where our environment, society, and economy coexist for the benefit of wildlife and people. We want to foster the connectivity that links our urban and rural areas, our freshwater and coast, our land and sea. We aim, along with our partners, to create;
 - ecologically functioning areas that can adapt to climate change; providing resilience and connectivity for wildlife,
 - access and enjoyment for people
 - a population that is inspired by the natural world and value our environment for the many ways in which it supports our quality of life;
 - a sustainable, low carbon contribution to the economy;
 - areas that provide a suite of essential ecosystem goods and services.
3. Our interests therefore lie in people and communities, wildlife, and their interaction.

Need

4. We don't believe that the Welsh Government has demonstrated
 - the need for a major new motorway or
 - that the motorway is the most sustainable or economically way to achieve additional capacity.
5. The Welsh Government state that the traffic problems discourage investors and impact the economy while a new motorway (at a cost of £1.2 billion), would solve all investment and current economic problems. However, no evidence for either claim has been presented.
6. In fact, we believe the contrary will occur, that Newport will lose out economically as it gives another reason for people to bypass Newport.. Like the recent news about the HS2, the Welsh Government should provide an independent, peer reviewed business case for the road that also assesses the winners and losers of this scheme. This report should also include an assessment of the loss of ecosystem services that the proposal would create (the Gwent Levels ecosystem services have been conservatively estimated at £67 million per annum).
7. Notwithstanding the above, Wildlife Trusts Wales (WTW) does recognise that congestion M4 congestion is an issue and that additional capacity is required. However, we are aware that there are several major opportunities to increase capacity in the pipeline. These include;
 - A rail strategy proposed by South East Wales Transport Authority (SEWTA)
 - Creation of a public transport hub at Cardiff Central
 - Electrification of the South Wales mainline
 - Cardiff Regional Metro
 - Additional capacity for east west road around Newport to relieve congestion
 - Active Travel Bill
8. Allied to the above, research shows that car usage has fallen since 2006 and plateaued while rail usage has risen by 80% in the last 10 years and shows no sign of reducing (Prof Stuart Cole, Page 9,

Business Section, Western Mail 2nd October 2013)(Annex 3). **Professor Stuart Cole CBE**, one of Wales' leading transport economics academics, also highlights a recent study by University College London that shows car usage by young and middle class males (the largest group numerically) has fallen.

9. In addition, we are aware that 40% of the traffic on the M4 is local traffic. Therefore, the above strategies and alternatives could reduce local traffic allowing the current M4 to ease the disruption on long distance traffic.
10. Therefore, the above raises considerable uncertainty about the need for such a major scheme that is contrary to many of the Welsh Governments plans, policies and legal requirements (see below) such as their sustainable development duty or duty to reduce greenhouse gas emissions by 3% per annum.

Environmental Impacts

Background

11. The Gwent Levels is one of the largest surviving areas of ancient grazing marshes and reens (drainage ditch) systems in Britain. It is the largest area of its kind in Wales, of acknowledged UK-wide significance for its wildlife and archaeology. The proximity of the site to the internationally important Severn Estuary and River Usk add further value to this wetland complex.
12. The designation of these Site of Special Scientific Interest (SSSI) is primarily as representatives of grazing marsh / reen habitat ("Gwent Levels" sites), with Magor Marsh having additional significance for its fen vegetation. In addition, the Levels also qualify as SSSI on the basis of their invertebrate assemblages, with significant plant species, otters, water voles and breeding birds also being additional qualifying features.
13. The River Usk is designated as a Special Area for Conservation (SAC) under European legislation. The main features of European importance are the river's migratory and resident fish species, including twaite and allis shad, sea, river and brook lamprey, Atlantic salmon and bullhead. Other species features of the SAC are the water crowfoot beds and the European otter which breeds along its banks and hunts for fish in the river and its tributaries. See Annex 2.
14. It has been estimated that around 4000 ha of the Gwent Levels have already been lost through industrial, housing and infrastructure development.

Impact

15. The motorway would have a significant impact upon the nationally important wetlands known as the Gwent Levels. **The motorway would cut through 4 of the Gwent Levels SSSIs and the River Usk SAC. The proposal would condemn 5 miles of the SSSI under the footprint of the development and much more subject to likely pollution events.** However, the CEM analysis by ARUP originally had the impact on biodiversity as 'medium' negative affect, only when repeatedly challenged, did they acknowledge that this would be a major negative impact.
16. This development is being proposed at a time when the Government has committed itself to addressing the causes of the failure to halt the loss of biodiversity in 2010 and addressing the issues raised in the **State of Nature**. This development will only add to that loss.
17. The motorway would also significantly increase the Welsh Government's **carbon footprint** through encouraging more traffic and the **significant embedded carbon in motorway construction**. The latter was not included in the ARUP calculations when assessing the greenhouse gas impacts. There assessment also was based on the assumption that, *'in the future, cars will be greener and emit less carbon dioxide'* (ARUP CEM team member, pers com). Even if these future cars, which we assume means electric cars, were immediately bought by the populous, this logic

fails to include the emissions from the source of the electric, e.g., power stations.

Ecosystem Services

18. The wetlands are incredibly valuable, based on a conservative estimate from the UK National Ecosystem Assessment, the **Gwent Levels provide up to £670m per year in 'ecosystem service' benefits**. These benefits would be significantly eroded by the presence of a motorway and we are concerned that, thus far, they have not been factored into any cost/benefit analysis of the scheme e.g. increased flooding, health issues¹.

Alternatives

19. A new motorway, was ruled out by the previous One Wales Government, due to financial and significant sustainability issues. These issues have not been resolved.
20. However, there are **a number of sustainable much lower cost alternatives** to a relief road which is estimated to cost **£1.2 billion** and not be ready until 2033. Alternatives include
- a rolling programme of upgrades to the A48
 - linking the A48 up with the Llanwern Steelworks road
 - junction closures on the M4 in order to reduce the significant local traffic (40%) from joining long distance traffic.
21. The A48 upgrades would cost approximately £380m and be ready in a matter of 3-5 years as most of the land is owned by Welsh Government. This would add additional capacity to the road infrastructure and help alleviate congestion around Newport. The logical conclusion of those improvements would be increased road capacity thus addressing the Brynglas bottleneck.
22. This would cost less and take less time to complete than an M4 Motorway, and also leave more investment to spare for integrated transport projects elsewhere in Wales such as those mentioned above. These other investments, such as South Wales Metro, would be better for the economy, jobs, health, social inclusion² and sustainability or in other words, a 'win-win'.
23. The One Wales Government set out a number of improvements including some of the above in 2009. However, these plans have not been given time to work such as using the Llanwern Steetworks road.
24. **Professor Stuart Cole CBE**, one of Wales' leading transport economics academics is about to publish an independent report looking at the economics of the Governments preferred route and alternatives. The report, to be published jointly by the **Institute of Welsh Affairs** and the **Chartered Institute of Logistics and Transport – Cymru Wales**, will be an economic and transport analysis of additional capacity associated with the M4 corridor. This report highlights many of the issues above and advocates for additional capacity via A48 and Llanwern Steel works (Professor Stuart Cole, pers com).
25. These alternatives protect the unique environment of the Gwent Levels but don't cost the earth.
26. We strongly urged the Minister for Economy, Science and Transport to seriously consider all options within Welsh Government's sustainable development duty and the ecosystem approach. We requested a meeting with the Minister to discuss our concerns but no meeting was forthcoming.

Consultation Process

27. WTW believes that the consultation process has been heavily biased towards the Governments preferred option. For example, it significantly downplayed the undoubted adverse impacts from the M4 Relief Road and using incorrect, out of date and partial

¹ <http://www.tfl.gov.uk/assets/downloads/corporate/technical-note-20-what-are-the-main-health-impacts.pdf>

² <http://www.bbc.co.uk/news/uk-wales-20602687>

information.

Policy Contradictions

28. The Welsh Government has a number of plans, programmes and policies that contradict its preferred option, for example,
- **Sustainable Development** – The Government of Wales Act put Sustainable Development at the heart of devolution. The Welsh Government’s *Programme for Government* reinforces the importance of sustainable development’s place as the core principle in defining the best development path for Wales. In addition, it commits to ensuring that all the Government’s policies and programmes reflect this central commitment to sustainable development. This duty places sustainability at the heart of their decision-making processes³
 - **Ecosystem Approach** – The Welsh Government stated “*in the light of emerging evidence on ecosystem health, in September 2010 the Natural Environment Framework, ‘A Living Wales’ was launched, to update our approach and ensure we were addressing the environment as a whole and looking at all the benefits better management of our environment can bring... The main changes that this ecosystem approach will bring are... Changes in the way we deliver policy, make decisions and regulate the environment*”⁴.
 - **Climate Change** – The Welsh Government want to work “*to tackle the causes and effects of climate change in our Climate Change Strategy for Wales. We have set out ambitious commitments to tackle the causes and consequences of climate change in a sustainable way in the Climate Change Strategy for Wales*”⁵. Within this Strategy, the key target to **cut greenhouse gas emissions by 3% per year in areas we control**⁶ - such as Transport.
 - **Active Travel Bill** - The Bill is intended to enable more people to walk and cycle and generally travel by non-motorised transport. The Welsh Government want to make walking and cycling the most natural and normal way of getting about. We want to do this so that more people can experience the health benefits, we can reduce our greenhouse gas emissions, and we can help address poverty and disadvantage. At the same time, we want to help our economy to grow, and we want to take steps that will unlock sustainable economic growth⁷.
 - **State of Nature Response** – the Minister Alun Davies stated “*As Minister for the new natural resources and food portfolio, I am committed to ensuring that opportunities for the environment and the economy go hand in hand. Good environmental practice is good economic practice. I am concerned that too often we have put the two issues in opposition, both in the way in which we have regulated nature, and the way in which economic activity impacts on our environment... The Welsh Government is committed to delivering the European Union biodiversity strategy commitment of halting and, where possible, reversing the decline of biodiversity by 2020*”⁸.
 - **Planning Policy Wales – Section 4.1.5** The main outcomes that we want to deliver are set out in our scheme and reflect our vision of sustainable development as a process of development that leads over time to a Wales that is economically, socially and environmentally sustainable (the process that leads to Wales becoming a sustainable nation); these are: **Sustaining the environment** Wales has healthy, functioning ecosystems that are biologically diverse and productive and managed sustainably. **A sustainable economy** A resilient and sustainable economy for Wales

³ <http://wales.gov.uk/docs/desh/publications/121107ppw5chapter4en.pdf>

⁴ <http://wales.gov.uk/about/cabinet/cabinetstatements/2011/110615nat/?lang=en>

⁵ <http://wales.gov.uk/topics/environmentcountryside/climatechange/?lang=en>

⁶ <http://wales.gov.uk/topics/environmentcountryside/climatechange/publications/strategy/?lang=en>

⁷ <http://wales.gov.uk/legislation/programme/assemblybills/active-travel-bill/?lang=en>

⁸ http://www.assemblywales.org/docs/rop_xml/130604_plenary_bilingual.xml#85930

that is able to develop whilst reducing its use of natural resources and reducing its contribution to climate change⁹.

These are but a few of the contradictions, and if called to give oral evidence I will expand, if it suites the Committee.

⁹ <http://wales.gov.uk/docs/desh/publications/121107ppw5chapter4en.pdf>



yn rhoi giving
cartref i nature
fyd natur a home

Response to the Environment & Sustainability Committee request for evidence on the M4 proposals around Newport

October 2013

RSPB Cymru is part of the RSPB, the country's largest nature conservation charity. The RSPB works together with our partners, to protect threatened birds and wildlife so our towns, coast and countryside will teem with life once again. We play a leading role in BirdLife International, a worldwide partnership of nature conservation organisations. The RSPB has over 1 million members, including more than 51,000 living in Wales.

We welcome the opportunity to respond to the Environment and Sustainability Committee's examination of the Welsh Government's proposal for an M4 motorway across the Gwent Levels. RSPB Cymru highly values the Gwent Levels due to its importance for wildlife and has identified the Levels as a Futurescape - an area for pursuing landscape scale conservation with multiple partners to deliver for wildlife on a large scale. We are therefore highly concerned by the Welsh Government's proposal to build a new section of the M4 motorway through this highly valued area.

In summary, we do not believe the Welsh Government has proven the need for a new road and advocate that in line with the Welsh Government's own Climate Change Strategy and commitment to sustainable development it should invest in low carbon sustainable transport solutions to address congestion and, allow time for the measures already taken to take effect.

If the Welsh Government is convinced a road solution is needed we advocate that the Welsh Government consider a reasonable alternative such as upgrading the current road infrastructure, ensuring no significant impact on the SSSIs.

RSPB Cymru urge the Welsh Government to drop plans for a new road across the Gwent Levels and to realise the full value of the Levels to the wildlife and the people of Wales.

1. Introduction

The primary focus of this paper is on the 'Consultation on a draft plan to improve the M4 around Newport' launched on 20th September 2013 along with the Strategic Environmental Assessment (SEA) Environmental Report 2013 and previous recent consultations. We are concerned that the consultations¹ have been framed in a manner as that the outcome is preferable for the Black Route (the traditional M4 Relief Road), a new three lane motorway between junctions 23-29 of the M4.

We are very concerned that there is no consideration within the Consultation document and SEA Environmental Report of low carbon sustainable alternatives. This approach is not consistent with Welsh Government policy or wider thinking on climate change or sustainable development.

In this paper we bring to the attention of the Committee the deficiencies in the consultation documentation itself and highlight our concerns around the consultation process.

2. Wildlife on the Gwent Levels

The Gwent Levels is a fragile wetland ecosystem. It is statutorily-designated, consisting of seven SSSIs

¹ M4 Corridor Enhancement Measures Consultation (2012), SEA to the M4 Corridor Enhancement Measures Consultation (2012), SEA Scoping Consultation (2013), Draft Plan and SEA Environmental Report (2013)

(Sites of Special Scientific Interest²). The area is designated for its scarce aquatic flora and fauna that live in the unique drainage ditches, known as reens, and grazing marsh habitat. The River Usk is also designated as a Special Area of Conservation (SAC) under European legislation for its migratory and resident fish species.

The Levels are Wales' largest and most important coastal and floodplain grazing marsh, a UK BAP Priority Habitat of acknowledged nature conservation concern³. The Levels are also important for landscape-scale nature conservation, being identified at a UK level as a "Futurescape"⁴ area for RSPB Cymru, and a "Living Landscape" area for the Wildlife Trusts.

Stretching from east Cardiff to Chepstow the Levels are home to an astonishing array of special birds and other wildlife including lapwings, otters, water voles and one of the UK's rarest bumblebees, the shrill carder bee. The area also hosts a number of specialist plants including frogbit, arrowhead and Wolffia – the smallest flowering plant in the world.

Damage caused by a new road would not be limited to the direct loss of habitat where the road would be built. The new motorway would effectively cut the Levels in half, fragmenting habitat and creating a lethal barrier for wildlife. The lack of water movement between two sides and increased pollution from traffic runoff would dramatically affect these fragile wetlands over a large area.

Furthermore, a new road through this nationally important area would make the land between it and Newport vulnerable to further development.

All three road options considered in the consultation would cause major irreversible damage to the wildlife of the Gwent Levels. The path of both the preferred route and the 'reasonable alternatives' (purple and red routes) within the consultation would run directly through a number of protected areas, which are nationally important for their wildlife (including five SSSIs.)

3. Consistency with Wider Welsh Government policy

3.1. Sustainable Development

We are very disappointed that the Welsh Government is proposing such an environmentally damaging project. We would expect a Government with sustainable development as its central organising principle to actively search for the least environmentally damaging way to address the issue it has identified. Sustainable development involves searching for creative solutions which enhance environmental, social and economic objectives, and we see no evidence of this approach being taken. Indeed the 'goals' of the consultation itself are all transport-related, there is no inclusion of sustainable development or environmental protection despite this being a highly designated area.

Furthermore, we can see no evidence of the true value of the area that would be damaged by the options in the consultation being included in any assessment. In addition to its importance to wildlife - as recognised by national designations - the Gwent Levels provides valuable 'ecosystem services'. Under the Natural Resources Management Programme the Welsh Government has been developing tools that should support better consideration of ecosystems in decision making; we can see no evidence that this work has been considered in developing the current consultation.

3.2. Climate Change Strategy

Climate change is the biggest mid to long term threat to biodiversity. We are therefore surprised and disappointed that the Consultation document does not make reference to the 2010 Climate Change Strategy for Wales. We would expect any proposal which includes the possibility of major new road

² SSSIs - Magor Marsh SSSI, Redwick and Llandeenny SSSI, Whitson SSSI, Nash and Goldcliff SSSI, Gwent Levels St Brides SSSI, Rumney & Peterstone SSSI, Newport Wetlands SSSI

³ UK BAP priority habitats were those that were identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP).

⁴ Futurescapes is the RSPB's contribution to landscape-scale conservation, a growing movement among UK conservation groups to provide rich spaces for wildlife and people working in partnership with others beyond the boundaries of nature reserves.

development to be considered within the context of the Climate Change Strategy, given the continuing problem of greenhouse gas (GHG) emissions from road transport contributing to climate change.

Transport emissions in Wales, predominantly from road use, were 13% of total Welsh GHG emissions in 2011. Whilst transport emissions have fallen by 4% from the level in the 1990 base year, emissions from all Welsh sources over the same time period have fallen considerably more - by 21%. Any proposal effecting transport policy which is likely to either hold transport emissions at their current level or increase them should therefore be subject to a careful appraisal with reference to the Climate Change Strategy.

The Consultation document projects increasing vehicle usage along the current M4 past Newport, but has no regard either to the resulting emissions impact or to the likelihood of such growth in traffic volume actually taking place.

In the Climate Change Strategy one of the principal emissions targets is that, by 2020, the number of annual motor vehicle kilometres travelled in Wales has been reduced. This target does not appear to have been considered within the proposal for this major new road infrastructure. Within the Strategy the target is coupled with a commitment towards 'low carbon modes' of transport – yet this is only touched upon but not explored in the consultation document.

The Climate Change Strategy recommends measures to encourage eco-driving, together with enhanced use of rail and bus services, to cut GHG emissions. The Consultation document references these options, but with no detail and no consideration about how best to implement them as alternatives to new road development.

From a climate change perspective, a new road scheme should always be very much a last resort, and then only in circumstances where all other possibilities have been considered and shown not to meet future need. We do not believe this is the case with this proposal.

The consultation documentation shows that much of the vehicle usage on this stretch of the M4 is short distance traffic, for which lower carbon alternatives – bus, bicycle and walking – should be identified and provided for. There is evidence to show that good public transport leads to a fall in car usage. Following an investment in low carbon transport solutions in London car use in the city has fallen by 35% over the past 15 years.

In summary, the Consultation document shows a total and irresponsible disregard to the contribution of road transport to climate change. We must look to invest in low carbon sustainable alternatives to reduce road use and our emissions across Wales. There is recognition of this within the Climate Change Strategy but it is given no consideration within this Consultation document which is inconsistent with the Welsh Government's policy on Climate Change.

4. Consultation documentation

4.1. Use of Data

We question some of the data which has been used in the consultation document to justify the need for a new motorway.

For example, one of the main justifications for the new road has been that traffic numbers on the existing M4 have been increasing⁵. The traffic modelling which has been carried out in relation to the new motorway has been based on out of date data and assumptions we believe are incorrect. The Welsh Government's own traffic figures show that the M4 traffic volume (having fallen after 2007) has now stabilised, and there is no robust evidence to support a significant rise in the future. In addition the SATURN model used for traffic forecasting also fails to factor into its calculations the long term trend in increasing costs of car use, including rising fuel prices, which it is widely acknowledged will inevitably effect future traffic levels.

⁵ M4 Corridor Enhancement Measures Consultation (March 2012)

The consultation documentation also uses out of date population predictions (based on data from 2008) to predict the levels of car ownership and use. The need for the new motorway is predicated upon a very rapidly-increasing population. However, the release of 2011 Census data has shown that these population predictions were overestimates.

4.2. Consideration of Alternatives

We are concerned that the consultations⁶ have been skewed in favour of the Welsh Government's favoured M4 Relief Road across the Gwent Levels and have not taken account of reasonable alternatives to a new road across the Levels. Low carbon sustainable transport alternatives are not included within the Consultation document and therefore no assessment can be made of the costs - environmental or economic - compared with other more sustainable alternatives. Less environmentally damaging and cheaper road upgrade alternatives are also not included within the document, such as the A48 upgrade. The three road options presented are three variations of in the main the same route.

The decision to discard the two less intrusive and less costly highway upgrade options was not consulted upon but decided between the M4 CEM consultation and the current consultation. Little justification for this decision as been provided and this process did not offer opportunity for the public or organisations to comment on the decision of Government to discard these options.

We do not believe the Government have allowed sufficient time for the measures which have been implemented in recent years to ease congestion on the M4 to have taken effect.

The Consultation document does not take full account of:

- a. The plethora of additional measures, either constructed or programmed, such as the duelling of the A465, the making public of the Steelworks Road, and a wide range of public transport and "smarter choice" measures, have not yet been in place long enough to exert downward pressure on traffic levels on the existing M4.
- b. The introduction of variable speed limits on the existing M4 has reduced accidents and other major congestion-triggering incidents.

Together with our views on the current and projected traffic numbers presented above, this leads us to believe there is no need for a new motorway across the Gwent Levels.

In addition, although within the consultation it is made clear that the Welsh Government believes the new road would bring significant economic benefit to South Wales⁷, we can see no evidence within the consultation, or in any other documentation produced by it, to back up this assertion.

4.3. Strategic Environmental Assessment (SEA)

In line with European legislative requirements the SEA must identify "reasonable alternatives" to the new motorway, the preferred option of Government. We are very disappointed that, besides the 'do nothing' option the only alternatives presented are the Purple and Red Routes (which are very slight variations on the M4 Relief Road itself, all of which cut through the Gwent Levels of Sites of Special Scientific Interest). The SEA fails to consider alternatives that avoid the very significant damage to the SSSIs, in spite of the existence of a number of alternatives which many be viewed as reasonable. An example of this is an alternative consisting of the combination of the upgrade to the A48 and the former steel works road. If the Welsh Government is determined that further road building is a necessary part of the solution then we strongly believe such less damaging options should be considered.

The SEA is further deficient because it attempts to downplay the adverse impacts on the environment from all of the alternatives set out in the draft Plan. There is a marked difference between the severity, scale and longevity of impacts set out in the previous SEA Environmental Report (November 2012) and

⁶ M4 Corridor Enhancement Measures Consultation (2012), SEA to the M4 Corridor Enhancement Measures Consultation (2012), SEA Scoping Consultation (2013), Draft Plan and SEA Environmental Report (2013)

⁷ "Congestion on the M4, particularly around Cardiff and Newport is sighted (sic) by the business community in South Wales as a barrier to economic growth" SEA Scoping Document, July 2013

those set out in the current SEA Environmental Report. No attempt is made to provide a rationale for these changes.

5. Consultation Process

5.1. Analysis of Consultation Responses

In the analysis of consultation responses to the previous M4 CEM consultation held over the summer of 2012 it states that the consultation “*resulted in public support for the provision of an additional high quality road to the south of Newport*”⁸. However, from the summary of responses of the 437 people or groups who responded to the consultation question related to the M4RR, 128 supported it or a variation of it, plus 32 who afforded “qualified support”. We are also disappointed that a number of responses have apparently been afforded very little consideration within the summary because they were submitted in response to a campaign.

5.2. Accessibility

We consider that every effort should be made to make consultations as accessible to the public as possible. We are concerned that the current consultation is not easily accessible. To respond to the formal consultation questions there is a requirement to register online at www.m4newport.com or request/ download a paper form. The formal consultation is comprised of nine detailed questions relating to the technical documentation of the draft plan, with only one opportunity for additional comments. We are concerned that the registration requirement and the detailed nature of the questions creates a barrier to public participation.

We welcome the initiative to hold public drop-in sessions to provide the public with information on the draft plan. Nevertheless are disappointed that the public are unable to verbally register their opinion at these events. We believe any representations the Welsh Government or the consultant Arup receive during the consultation period should be fully considered by Government as part of the consultation and be analysed as a formal response.

5.3. Minimum Consultation on previous SEA (2012)

RSPB Cymru are disappointed the Welsh Government did not seek to consult for any longer than the minimum requirement (28 days) on the previous SEA Environmental Report (2012) in order to allow a wider response to the report. The Government’s own Good Practice Guide⁹ states that consultation should give appropriate timeframes for the public to express views. The SEA Regulations themselves state (Reg 13 (3)) that an effective opportunity must be given to the public to express their opinion. Given the overall time frame of the M4 Relief Road (construction to be completed in 2033) enabling a longer consultation period on the previous SEA would have had no impact on the timescales of the evolution of this project, but would have given organisations a better opportunity to respond.

⁸ M4 Corridor Enhancement Measures CEM Participation Report (August 2013)

⁹ A Practical Guide to the Strategic Environmental Assessment Directive, WAG et al (2005)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf

October 2013

**Submission to the
Environment & Sustainability
Committee**

in response to

Call for Written Evidence: M4



**cyfeillion
y ddaear
cymru
friends of
the earth
cymru**

Summary

By any yardstick, the answer to the consultation question “*whether current Welsh Government proposals in relation to the M4, and the process to date, have effectively balanced economic and environmental needs and interests*” can only be “no”.

Economic needs and interests

1. A new motorway south of Newport was first proposed by Secretary of State for Wales in 1991¹.
2. In whatever guise, the Wales Office or the Welsh Government have therefore had 22 years in which to develop a robust economic case for building a motorway bypass of Newport.
3. On 19 April 2013, Friends of the Earth Cymru submitted a Freedom of Information request to the Welsh Government asking for:
“All economic analyses (including cost-benefit analyses) relating to various options for modifications/improvements to the M4 around Newport”.
4. On 21 May 2013, in appealing the Welsh Government’s deficient response, we asked:
“I would be grateful if you could tell me if I am correct in assuming that the only publicly available information on [Benefit:Cost Ratio] relates to work packages that were not part of public consultation and were themselves incomplete”.
5. On 18 June 2013 we received this response from Andy Falleyn, Deputy Director of Transport:
“I have reviewed the additional economic analyses and cost-benefit information that we hold and which has been exempted under this section and can confirm that this information is a necessary part of our work to fully explore the options being considered for modifications and/or improvements to the M4 around Newport. The information is not complete and is subject to further amendment”.
6. No analysis has ever been published – or, apparently, completed – by the Welsh Government or its predecessors to demonstrate whether or not there would be any economic benefit from a new M4.
7. The Committee is seeking views on:
“whether current Welsh Government proposals in relation to the M4, and the process to date, have effectively balanced economic and environmental needs and interests”.
8. Clearly, based on the Welsh Government’s failure to publish an economic analysis the answer to this question can only be “no”.
9. The Welsh Government’s failure to publish an economic analysis subverts proper scrutiny of the proposal and therefore subverts due democratic process.

¹ http://www.southwalesargus.co.uk/news/gwentnews/4496647.M4_RELIEF_ROAD_Timeline/

Environmental needs and interests

10. The environmental case has been examined to some degree. The Welsh Government was forced to abandon its Strategic Environmental Assessment published in November 2012 following legal challenge by Friends of the Earth Cymru and Gwent Wildlife Trust, because it was so flawed².
11. Despite its flaws rendering it unlawful, even that consultation determined that the environmental impacts of a 'high quality road to the south of Newport' as having 'major negative' impacts on:
- Biodiversity (worse than any of the alternatives)
 - Soil (worse than any of the alternatives)
 - Water (worse than any of the alternatives)
 - Material assets (only widening the motorway through the Brynglas tunnels was as bad)
 - Cultural heritage (only widening the motorway through the Brynglas tunnels was as bad)
 - Landscape and townscape (two of the alternatives were equally bad)
12. Major negative impacts are defined as being:
*"direct, irreversible and permanent. The magnitude of the predicted effects will also be major"*³.
13. Our legal challenge did not contest the consultation's conclusions on the scale of impacts; this was not one of the grounds on which it was unlawful.
14. An objective analysis of the environmental impacts could only have concluded that the former Highway Option A (an additional high quality road south of Newport) was substantially the worst performing option in terms of environmental impact.
15. Any alternative analysis would clearly have been irrational and subject to challenge in the courts.
16. The current Strategic Environmental Assessment considers only three 'high quality roads south of Newport', and 'do minimum'⁴. In these circumstances it is hardly surprising that there is a high degree of similarity between the three motorway options.
17. What it difficult to comprehend is that the impact on several factors has been downgraded from 'major negative' to 'minor negative' since the previous iteration:
- Biodiversity – now only minor negative impact
 - Soil – now only minor negative impact
 - Water – now only minor negative impact
 - Material assets – now only minor negative impact
18. It is not clear that there is any justification for this significant shift in reducing the impact of a high quality road to the south of Newport. A dispassionate observer might conclude that a degree of

² http://www.foe.co.uk/cymru/english/press_releases/m4_consultation_failure_060213.html

³ <http://www.m4cem.com/downloads/reports/M4%20CEM%20SEA%20Environmental%20Report%20&%20Appendices.pdf> page 81

⁴ <http://m4newport.com/assets/issue-m4-sea-environment-report---publication---c2.pdf> page 91

massaging the criteria or boundaries has taken place in order to make a motorway seem environmentally acceptable.

19. We have serious concerns that this Strategic Environmental Assessment could be challenged in the courts for the following reasons:
- The apparent 'downgrading' of impacts since the previous iteration, with no apparent justification
 - The failure to include any alternatives other than a high quality road to the south of Newport, and 'do minimum', rendering the consultation redundant
 - The inclusion of substantive options only that relate to the option with the worst environmental performance in the previous iteration. This would appear to indicate that the Welsh Government is determined to press ahead with an option with poor environmental credentials, and is therefore the outcome of the consultation has been pre-determined.
20. The Committee is seeking views on:
"whether current Welsh Government proposals in relation to the M4, and the process to date, have effectively balanced economic and environmental needs and interests".
21. Clearly, based on the Welsh Government's multiple failures to either assess reasonable alternatives or to fairly assess those alternatives subject to assessment the answer to this question can only be "no"

Conclusion

22. By any yardstick, the answer to the consultation question *"whether current Welsh Government proposals in relation to the M4, and the process to date, have effectively balanced economic and environmental needs and interests"* can only be "no".
23. We are concerned that given the Welsh Government's apparent pre-determination in favour of a motorway to the south of Newport, that redress may only be found through the courts.

Agenda Item 7

Environment and Sustainability Committee October 2013

Purpose

To inform Committee of ICE Wales Cymru's position in respect of current Welsh Government proposals in relation to the M4 in South east Wales, and the process to date, and to consider if the proposals have effectively balanced economic and environmental needs and interests.

M4 Corridor Around Newport (i.e. M4 Relief Road / New M4 Project)

1 Background

- 1.1 There are recognised capacity and resilience problems on the M4 around Newport. Journey times are unreliable and congestion occurs, particularly during peak travel times. ICE Wales Cymru has called for improvements for many years.^[1]

2 Issues

- 2.1 The Brynglas Tunnels have capacity restrictions and a history of problems relating to a number of fires and incidents in the twin bore, two-lane east and west bound tunnels. Major disruption to the highway network occurs when these happen that can and does spread rapidly across the region.
- 2.2 In order to make the best of the available highway network, a managed motorway scheme has been implemented that has been in operation for a relatively short while. This, however, will not resolve the issues in the medium to long term.
- 2.3 In addition an excess number of closely spaced junctions coupled with poor alignment (both horizontal and vertical) on the existing M4 conspire to lead to inefficient vehicle operation and an above average accident record for a highway of that character. Effectively the M4 in this location acts as the Newport Northern By-Pass (as it was conceived originally) and not as a strategic motorway.
- 2.4 ICE Wales Cymru recognises that considerable amount of preplanning and design already carried out to seek solutions to the problem of motorway congestion and unreliable journey times which have become increasingly worse during the period of the studies and investigations.
- 2.5 The morning and evening peak periods are lengthening such that they will eventually merge. The peak travel conditions may occur from 6am to 8pm in time.

1. ^[1] Institution of Civil Engineers Wales Cymru (2013) State of the Nation: Transport Briefing, p1; Institution of Civil Engineers Wales Cymru (2013) State of the Nation: Infrastructure 2010 Briefing, p3; Institution of Civil Engineers Wales Cymru (2013) State of the Nation: Defending Critical Infrastructure Briefing, p1:

2.6 This situation causes a great deal of concern because of the highway's fragile nature – a simple incident could have a considerable effect and cause considerable consequential delays.

3 **Solution**

3.1 ICE Wales Cymru considers that there is a proven need for the provision of a new motorway to alleviate the problems and resolve the issues.

3.2 ICE Wales Cymru considers that the proposed M4 is a key piece of the highway infrastructure and the provision will provide major benefits to the economy of South Wales. With a proven multiplier effect¹ of at least 2.84 for investment in infrastructure, the construction of the new motorway will reap both medium and long term benefits to the area. As the M4 links to and serves mid and west Wales, the benefits provided and economic growth will be felt across much of Wales.

3.3 Having considered the consultation, ICE Wales Cymru believes that the Black route – to the south of Newport will provide the optimum solution to the problems. This has been supported by ICE Wales Cymru in the past and it is considered to strike a balance between the sometimes differing needs / objectives of transport infrastructure, business needs, economic regeneration, the needs of the travelling public and not least, the environmental aspects.

3.4 In consideration of the sustainability issues, ICE Wales Cymru believes that the correct balance is struck between the environmental, financial and social aspects. Whilst the Black route traverses SSSI designated land, suitable and proportionate measures are proposed as part of the overall package. ICE Wales Cymru considers that it may be possible for the project to include further environmental measures that could even enhance the SSSI areas, i.e. instead of a detrimental effect, the project could have net positive benefits by enlarging the area of the SSSI.

3.5 Considering the air quality issues, there is a current problem on the existing motorway as evidenced by Air Quality Management Areas. The Welsh Government is already required to address this matter. It is considered that the Black route proposed will alleviate much of the ongoing problem by enabling existing and future traffic to operate more efficiently.

3.6 If the Black route is implemented, there will be considerable opportunities to enhance the local travel modes of transport along the route of the existing M4. ICE Wales Cymru believes that these measures should be investigated for implementation as part of the overall project.

¹ UK Contractors Group / LEK Consulting (2012) Construction in the UK Economy, The Benefits of Investment, p10.

4 Funding

- 4.1 ICE Wales Cymru recognises that funding of the motorway will require the provision of borrowing power for the Welsh Government. ICE Wales Cymru strongly believes that this should not be a deterrent to the enabling or provision of the required motorway.

5 Conclusion

- 5.1 There is an established link between the condition of the Infrastructure and the economy of Wales and continued investment and improvements to the transport infrastructure of Wales will assist in economic growth of Wales.
- 5.2 The construction of the new motorway will bring additional benefits of jobs to Wales on the planning, design, construction and maintenance of the motorway as well as stimulating additional jobs across Wales. The current conditions are hindering development.
- 5.3 ICE Wales Cymru strongly supports the provision of a new motorway to the south of Newport.
- 5.4 ICE Wales Cymru considers that the Black route offers the optimum solution.

Keith Jones Director, Institution of Civil Engineers Wales Cymru

17th October 2013

- The Institution of Civil Engineers (ICE) was founded in 1818 to ensure professionalism in civil engineering. It represents over 80,000 civil engineers in the UK and across the globe and has over 3500 members in Wales.
- ICE has long worked with the government of the day to help it to achieve its objectives, and has worked with industry to ensure that construction and civil engineering remain major contributors to the UK economy and UK exports.
- For further information visit: www.ice.org.uk and www.ice.org.uk/wales

Environment and Sustainability Committee

Meeting Venue: Lantra training centre, Royal Welsh Showground, Builth Wells

Meeting date: Thursday, 24 October 2013

Meeting time: 13:20 – 15:00

This meeting can be viewed on Senedd TV at:

http://www.senedd.tv/archiveplayer.jsf?v=en_700002_24_10_2013&t=0&l=en

Cynulliad
Cenedlaethol
Cymru

National
Assembly for
Wales



Concise Minutes:

Assembly Members:

Mick Antoniw
Llyr Gruffydd
Julie Morgan
William Powell
Antoinette Sandbach
Joyce Watson

Witnesses:

Ed Bailey, National Farmers' Union Cymru
Ceri Davies, Wales Young Farmers Clubs
Keri Davies, Welsh Organic Group
Dylan Morgan, Deputy Director, National Farmers' Union Cymru
Rhian Nowell-Phillips, Farmers' Union of Wales
Sarah Price, Wales Young Farmers Clubs
Ben Underwood, Country Land and Business Association
Gavin Williams, Farmers Union of Wales

Committee Staff:

Alun Davidson (Clerk)
Catherine Hunt (Deputy Clerk)
Elfyn Henderson (Researcher)

TRANSCRIPT

View the [meeting transcript](#).

1 Introductions, apologies and substitutions

1.1 In the absence of Dafydd Elis-Thomas, William Powell was elected as temporary Chair under Standing Order 17.22.

1.2 Apologies were received from Dafydd Elis-Thomas, Russell George and Julie James.

2 Sustainable Land Management : Oral evidence

2.1 The witnesses responded to questions from members of the Committee.

3 Sustainable Land Management : Oral evidence

3.1 The witnesses responded to questions from members of the Committee.

4 Papers to note

4.1 The Committee noted the minutes.

5 Motion under Standing Order 17.42 to resolve to exclude the public from the meeting for the following business: Item 6

6 Draft budget 2014–15

6.1 The Committee discussed its letter to the Finance Committee.