

Welsh Government consultation on draft orders for the M4 corridor around Newport

Response from Campaign for Better Transport

May 2016

Objection to scheme order 201 for a proposed new section of M4 south of Newport

Campaign for Better Transport is a leading charity and environmental campaign group that promotes sustainable transport policies. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment.

We formally object to the scheme orders for construction of the proposed new M4 motorway section south of Newport, on the grounds that it will not deliver sufficient benefits to justify the environmental and financial costs. Instead it will undermine key policy goals on environmental protection, modal shift, carbon reduction, air pollution and public health. We are calling instead for a consideration of less expensive and damaging route options, combined with better use of rail freight and public transport alternatives.

The proposal is for a new length of M4 motorway to the south of Newport, linking to the existing M4 at Magor and at Castleton.

We believe the proposal is unacceptable on grounds of environmental impact and lack of consideration of alternatives: and that it is contrary to other key national policies. The proposed scheme route ignores the alternative “blue route” which would be less expensive, quicker to construct, and would avoid destructive impact on the Gwent Levels, while providing better connectivity to existing settlements. The proposed scheme does not sufficiently explore potential for rail freight and public transport alternatives.

In their consultation materials, the promoters describe the route in the proposed scheme order as being *“the sustainable, long-term solution to current social, environmental and economic problems associated with this route”*. They go on to say the proposed new motorway *“forms an essential part of our vision for an efficient integrated transport system in South Wales”* and claim it will *“improve accessibility for people as well as Welsh goods and services to international markets”*.

We believe each of these claims is ill-founded: a new motorway across the Gwent Levels would not contribute to sustainability, would create new environmental problems, and would not provide an integrated transport system. It is not the right solution to support economic growth nor to improve accessibility for people and businesses.

Impact on the natural environment

The proposed scheme route would destroy the Gwent Levels Living Landscape SSSIs, cut across the Gwent Wildlife Trust’s Magor Marsh Nature Reserve, and adversely impact the River Usk Special Area of Conservation (SAC). These protected sites provide a nationally and internationally important habitat for native mammals, wading birds and Nationally Notable or Red Data Book aquatic invertebrate species.

The Gwent Levels is one of the largest surviving areas of ancient grazing marshes and reed systems in Britain and is the largest area of its kind in Wales and has been registered as a Landscape of Outstanding Historic Interest. It is extremely rich in wildlife with otters, water voles, wading birds such as lapwing, snipe, redshank and curlew, 25 rare plants (including the world’s smallest flowering plant *Wolffia arrhiza*) and 144 rare species of insects.

The environmental impact of the proposed scheme on protected wildlife sites, combined with the landscape and visual impact on the Gwent Levels would be severe and irreversible. The motorway route set out in the proposed scheme order 201 fails to address these fundamental concerns and we believe should be rejected on these grounds alone.

Wider environmental impacts

However the impact on protected sites is not the only grounds for objection to the scheme orders. The higher traffic volumes and encouragement of car use arising from new road capacity would be at odds with other key public policy priorities.

The UK has a binding target of an 80% CO2 emissions reduction by 2050, and the Welsh Government has committed to achieve at least a 40% reduction in greenhouse gas emissions in Wales by 2020 against a 1990 baseline. Reducing transport emissions is essential for this, given that transport accounts for around 14 per cent of greenhouse gas emissions in Wales.¹

The Welsh Government's Climate Change Strategy commits to "supporting transport investment which encourages a shift to low carbon modes of transport", and to reducing the need to travel.² By increasing dependency on road travel as opposed to sustainable alternatives, the proposal is contrary to the Climate Change Strategy, which aspires to a fully decarbonised transport network, and to the goals set out in Planning Policy Wales (January 2016)³ which says developments should be "consistent with minimising the need to travel and increasing accessibility by modes other than the private car." (section 4.7.4)

The UK Government has been found to be in unlawful breach of air quality standards, with some of the most polluted air in Europe. The major source of NOx and particulates is emissions from diesel engines. Increasing road capacity is directly at odds with the urgent need to address illegal levels of air pollution, which is responsible for nearly 30,000 premature deaths (at typical ages) in the UK, and an associated loss of population life of 340,000 life-years.⁴

Sustainable alternatives

The promoters refer to integrated transport: however, massive investment in new motorway capacity is the opposite of an integrated transport policy. The phenomenon of induced traffic is well-established: additional traffic movements arise to consume and exceed new road capacity. There is also a risk of displaced traffic on to local roads with adverse impacts on congestion, safety and environmental quality. This has been observed, for example, in England on the M6 and the M25. The latest reports on the Dartford Crossing demonstrate that new road capacity cannot provide a sustainable long-term solution: "Analysis of traffic data shows that traffic demand at Dartford has responded in step with capacity; such that whenever new capacity has been provided, it has filled up and created the need for more capacity. This has been a recurring pattern since the second tunnel was opened at Dartford in 1980 and then the QEII Bridge in 1991. Today there is insufficient capacity to cater for current and future traffic demand."⁵

An approach based on demand management and sustainable modes would sit far more comfortably with the NPPF which advocates that "economic, social and environmental gains should be sought jointly and simultaneously through the planning system"⁶.

There is a wasted opportunity to consider rail-led alternatives for connecting people to jobs, and moving freight. Planning Policy Wales states that planning authorities "should promote the carriage of freight by rail, water or pipeline rather than by road" (section 8.5.4). Rail freight connections to ports and airports provide businesses in Wales with accessibility to international markets without the damaging impact of new motorways. In terms of air pollution, rail freight produces 76% less CO2 than the equivalent HGV journey, 90% less PM10 and up to fifteen times less NOx.

¹ Wales Transport Strategy 2008 <http://gov.wales/docs/det/publications/140909-transport-strategy-en.pdf>

² Welsh Government Climate Change Strategy, 2010 <http://gov.wales/docs/desh/publications/101006ccstratfinalen.pdf>

³ Planning Policy Wales, January 2016 <http://gov.wales/docs/desh/publications/160104planning-policy-wales-edition-8-en.pdf>

⁴ Public Health Wales: Air Quality <http://www.wales.nhs.uk/sitesplus/888/page/81974>

⁵ Highways England: Lower Thames Crossing Pre-Consultation Scheme Assessment Report

https://highwaysengland.citizenspace.com/cip/lower-thames-crossingconsultation/supporting_documents/Scheme%20Assessment%20Report%20%20Volume%201%20%20Executive%20Summary.pdf

⁶ UK Government: National Planning Policy Framework

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

There is potential to make better use of existing freight capacity at the Wentloog terminal as well as to review disused or underused industrial rail links, particularly with investment in enhanced loading gauge capability, which would be a more sustainable alternative to the proposed motorway scheme.

The current electrification of the South Wales railway network, backed by a £17m contribution from the Welsh Government, combined with a potential new rail franchise, better trains and enhanced services will improve passenger capacity and journey times.⁷ The impact of this project, due for completion in 2017-18, should be fully assessed before embarking on increased road capacity. The Welsh Government could look to the example of Transport for the North which sees modern rail as underpinning “an integrated network that spreads economic benefits across the whole of the North.”⁸

The rollout of Superfast Cymru will enable improved e-commerce and online delivery of goods and services, without the need for road travel.⁹ Recent mapping of job opportunities in Wales shows that growth is largely in service sectors that are not dependent on long distance travel, including personal care, child care, financial administration, IT, and hospitality.¹⁰ In addition, it is noteworthy that Newport and Cardiff have some of the lowest car ownership levels in Wales, with around 30% having no car, so would have limited benefit from the new motorway capacity, while suffering its environmental impacts.¹¹

While we do not believe any major new road infrastructure is a sustainable option, should the Welsh Government be committed to upgrading the existing M4 corridor, then the alternative ‘blue route’ should be considered in preference to the current proposed scheme. This route option is based on a Welsh Government plan from 2007, and uses a combination of the A48 Newport Southern Distributor Road (SDR) around Newport and the former Steelworks Road to create a dual carriageway to motorway / expressway standard. It would be cheaper, quicker to construct and less environmentally damaging than the current proposal, and as such merits serious consideration as an alternative option.¹²

In objecting to the proposed scheme orders, instead we call on the Welsh Government to consider a package of alternative proposals which could include:

- The cheaper and less damaging “blue route” option for the M4
- Innovation in managing demand on the M4 with priority for mass transit and less polluting vehicles
- Investigating improved rail freight capacity and dedicated rail freight routes
- Improving public transport connections to and between Newport and Cardiff
- Investment of monies saved from not constructing the new motorway in high quality public transport alternatives, and environmental mitigation of the existing route.

We believe that by rejecting the proposed motorway scheme and investigating these alternatives instead, the Welsh Government will help deliver a future where Wales has not only a thriving economy but also a healthy community and a flourishing natural environment.

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Bridget Fox

Campaign for Better Transport

Campaign for Better Transport’s vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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⁷ Network Rail: South Wales <http://www.networkrail.co.uk/south-wales/>

⁸ The Northern Transport Strategy: Spring 2016 Report

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/505705/northern-transport-strategy-spring-2016.pdf

⁹ Superfast Cymru <http://www.superfast-cymru.com/home>

¹⁰ IPPR Where the Work Is (Wales) http://wheretheworkis.org/#/?location_type=Nation&location=WALES

¹¹ Welsh Transport Statistics 2010 <http://gov.wales/docs/statistics/2011/111122-transport-statistics-2010-ency.pdf>

¹² Institute of Welsh Affairs: The Blue Route <https://www.foe.co.uk/sites/default/files/downloads/m4-blue-route-45610.pdf>