

Env & SD Committee  
Welsh Government  
National Assembly for Wales  
Cardiff Bay  
Cardiff  
CF99 1NA  
18<sup>th</sup> 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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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 2<sup>nd</sup> 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 reed (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 / reed 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 issues<sup>1</sup>.

### **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 inclusion<sup>2</sup> 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 Steelworks 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

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

<sup>2</sup> <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 processes<sup>3</sup>
  - **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*”<sup>4</sup>.
  - **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*”<sup>5</sup>. Within this Strategy, the key target to **cut greenhouse gas emissions by 3% per year in areas we control**<sup>6</sup> - 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 growth<sup>7</sup>.
  - **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*”<sup>8</sup>.
  - **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

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

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

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

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

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

<sup>8</sup> [http://www.assemblywales.org/docs/rop\\_xml/130604\\_plenary\\_bilingual.xml#85930](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 change<sup>9</sup>.

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

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