

Gwent Wildlife Trust

Ymddiriedolaeth Natur Gwent



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Dear Lord Dafydd Elis-Thomas,

**The National Assembly for Wales` Environment and Sustainability Committee:
Request for views on the proposals for the M4 and the process to date**

The Gwent Wildlife Trust wishes to provide the following response regarding the above request for views.

- **1. Requirement of Business Case**

It is our view that the current M4 consultation should have included a business case identifying how a new motorway would enhance business and jobs in South Wales, quantifying this with detailed figures and providing an independent assessment of where the greatest impact is likely to be, both in terms of jobs and in terms of development pressure on protected areas. It is our view that a new stretch of motorway south of Newport may result in new businesses looking to Cardiff and beyond for their base. This might result in businesses by-passing Newport, leaving it to go into further decline.

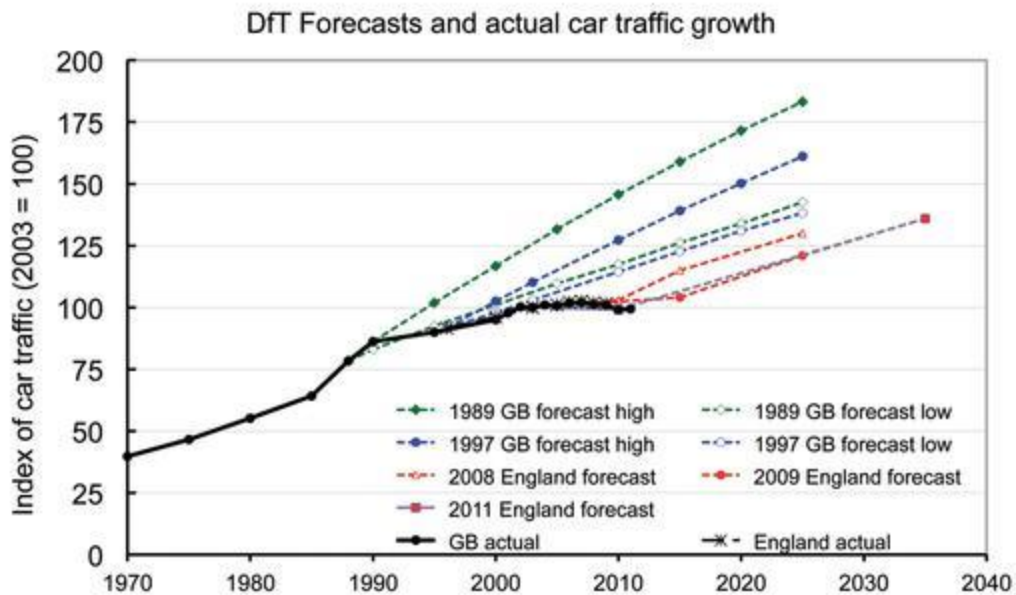
- **2. Traffic Volume Data Used – Misleading Information**

Forecasts of increasing traffic volumes used to justify the need for a new motorway, such as those illustrated in figure 2, page 9 and figure 5, page 11 of the current M4 consultation document, do not appear to be in any way backed up by trends seen in

Britain as a whole or even on the M4 itself. In fact traffic volumes have not increased since 2004 on the M4. There may be a number of reasons for this. The two reasons given in the document, 'the recession' and 'roadworks on the M4' do not in our view explain the changes in a satisfactory way. These two reasons can be used to imply traffic volumes will go up again. However other possible reasons for this change have not been mentioned and could have a much longer lasting impact on reducing traffic volumes. These other reasons include:

1. Increasing petrol prices are reducing the number of journeys made
2. Increasing use of home working practices and flexible working
3. Decreasing company car mileage (dropped by nearly 40% between 1995-7 and 2005-7) dating from when tax breaks were taken away
4. Communication technology is leading to fewer face to face meetings
5. Increasing use of on-line shopping
6. Rail travel is growing across all parts of Britain

This consultation document, in our view, should not lead the reader to believe traffic volumes will increase when current evidence suggests they may not increase.



This chart produced by Professor Phil Goodwin from the University of the West of England, illustrates how forecasts from the past 22 years have failed to predict the actual number of miles driven in cars, and the inaccuracy has always been one way - massively overestimating the amount of driving people will do.

I would also wish to refer you to the 'On the Move: Making sense of car and train travel trends in Britain' report published by the RAC Foundation in December 2012. This report was commissioned by the RAC foundation, Office of Rail Regulation, Independent

Transport Commission and Transport Scotland, working with academics from UCL. This report aimed to shed some light on factors that mean **new** traffic forecasts (and rail passenger forecasts) are needed in future.

- **3. Achievements of the Variable Speed Limits and Traffic Control Staff**

Many current users of the M4 contest that the recent introduction of variable speed limits has significantly improved traffic flow on the M4. The omission of information in the current consultation document concerning the variable speed limits and their success is regarded as a serious omission when consulting, regarding a new motorway, justified on the basis of poor traffic flow and congestion on the current M4. This improved flow could also mean that commuters and travellers are experiencing more delays at junctions such as the Coryton Interchange than they are on the actual motorway. Failing to provide an up to date and accurate picture of congestion is viewed as misleading for those reading the plan.

- **4. Absence of Reasonable Alternatives Offered on the Response Form**

It is our view that the current consultation has been devised in a way which discourages comments on public transport alternatives. In providing the public with a choice of 3 new road options, and a 'do minimum' option, the choice of a significant increase in spending on sustainable transport projects such as bus and rail has been omitted. It could be viewed that this is a reasonable alternative, and could have been offered in conjunction with some additional road improvements to increase the resilience of the existing road system.

- **5. Limited Information given in Consultation on Biodiversity Loss**

We also hold the view that the damage to the Gwent Levels, the loss of nationally important habitats and species, the fragmentation effects of a new motorway through the Levels, and the indirect effects such as potentially damaging air/surface pollution are down played by the consultation. Describing the loss simply in terms of a percentage of the total SSSI, and 'up to 60 hectares' does not give readers a broad understanding of the species and habitat loss involved. We believe that given the misleading and inaccurate predictions of traffic flow, the large scale damage to the historic landscape of the Gwent Levels and the Sites of Special Scientific Interest cannot be justified. We will provide an in depth assessment of biodiversity impacts of the proposed motorway in our detailed response to the current consultation.

- **6. Sustainability Policy**

As the Welsh Assembly has pledged that it will put sustainable development at the core of the Welsh Government, it would do well to re-assess the way that it puts forward large scale road building proposals such as the M4, the methods it uses to prepare

traffic forecasts and how effectively it takes into account recent trends and changes in traffic flow and the way we travel and work. These elements will all help the Welsh Government balance the economic needs for a new road and the environmental and biodiversity damage it will cause.

Yours sincerely,

Lindi Rich
Conservation Officer