

Sustrans Cymru submission to Environment and Sustainability Committee on M4 Corridor proposals

October 2013

Sustrans is a leading UK charity enabling people to travel by foot, bike or public transport for more of the journeys we make every day. We work with families, communities, policy-makers and partner organisations so that people are able to choose healthier, cleaner and cheaper journeys, with better places and spaces to move through and live in. Our aim is to bring about change such that four out of every five trips under five miles are made by sustainable means by the year 2020.

Overview

1. The Committee has requested views on the balance to date of economic and environmental needs and interests in the Welsh Government's proposals and we have limited our response to these areas.
2. In particular we have focussed on analysing the Strategic Environmental Assessment Environment Report, alongside the main consultation document – including the overview and rationale for the project.
3. In our view, the primary rationale for the preferred options for M4 Corridor Enhancement are based purely on supposed economic terms, and environment concerns highlighted appear to have minimal impact on the preferred options.
4. The limited consultation options – three major road schemes to the south of Newport and a Do Minimum Option – provided as solutions to congestion on the existing M4, mean that the environmental outcomes are similar. However, the lack of options renders the scoring system somewhat irrelevant.
5. In particular, Wales has ambitious targets to cut carbon emissions, and plans for such a significant new road would likely see carbon emissions rise, by increasing the number of private vehicles on the road (which is what the case for the new road is built on).

Economic case

6. The economic case for providing a new relief road (or motorway, as the Minister for Economy, Science and Transport calls “the preferred option”¹) relies largely on highlighting the fact that congestion on the existing section of the M4 is a significant negative for the Welsh economy. Sustrans Cymru would not dispute that congestion has a negative impact on the economy.
7. However, it is not clear that any evidence has ever been published by the Welsh Government that indicates how a new motorway would provide economic benefit.

¹ Consultation Document, page 3 <http://www.m4newport.com/assets/issue-m4-draft-plan-consultation-document.pdf>

8. The draft plan on M4 Corridor Enhancements does not consider any options other than building a new road (and a Do Minimum) option, partly because *“the Welsh Government has commissioned a separate study and report on proposals to develop a metro system for South East Wales.”*²
9. To provide a full comparison, rather than a Do Minimum baseline option, we would prefer to see a “Do Anyway” package of measures to reduce car use for short journeys (including public transport, walking, cycling and behaviour change measures) prior to any proposed capital schemes.
10. By failing to take into account the economic costs and benefits of schemes involving upgrades to the existing road network, alongside significant public transport improvements (for example the Metro proposals and plans contained in the draft SEWTA Rail Strategy), there is no evidence that a new road would be the best option for the Welsh economy, even dismissing all environmental impacts.
11. This is despite the fact that a new motorway was proposed by the Welsh Office as early as 1991, and therefore there have been over 20 years to provide a comprehensive economic case for this project.³
12. In fact, in 2011 a Welsh Government proposal put forward focussing entirely on public transport improvements in the M4 corridor area highlighted that these plans alone would tackle problems around the M4.⁴
13. Because no clear economic case has ever been published, it is not possible to fully scrutinise the proposals to determine if both economic and environmental concerns have been balanced. However, the main reason given for building a new road is the increasing level of congestion on the existing M4 and the corresponding cost to the economy.
14. Even if the economic case is founded on the costs of congestion, building a new road is not the answer, as such benefits are typically short-lived because additional road capacity rapidly creates extra traffic.⁵ The Eddington review urged a ‘mode agnostic’ approach to transport investment, considering options for tackling congestion including public transport and demand restraint, rather than roads.⁶ Prioritising investment in new roads also risks diverting attention and resources available from more effective interventions. Measures to change travel behaviour and shift journeys to public transport, walking and cycling can achieve sustained reductions in congestion more quickly and at lower cost.

Environmental case

² Consultation Document, page 4 <http://www.m4newport.com/assets/issue-m4-draft-plan-consultation-document.pdf>

³ http://www.southwalesargus.co.uk/news/gwentnews/4496647.M4_RELIEF_ROAD_Timeline/

⁴ <http://www.m4cem.com/downloads/reports/SS%20Package%204.pdf>

⁵ **SACTRA 1994** Trunk roads and the generation of traffic; **SACTRA 1999** Transport and the Economy

⁶ **DfT 2006** Eddington Study: transport’s role in sustaining the UK’s productivity and competitiveness

15. The environmental case has been considered to some degree throughout the process. The main environmental case put forward for the options proposed in the current draft plan is the decrease in air quality on the current route if the 'Do Minimum' option is taken forward.
16. Throughout previous iterations of the process the Environmental Assessments of the Welsh Government have come under significant pressure, most notably in 2012 when the process had to be halted because it was considered to be inadequate.⁷
17. The current Strategic Environment Assessment makes some claims that cannot clearly be supported by robust evidence. For example, in relation to Greenhouse Gas emissions, we are told that emissions will decrease per person kilometre.⁸ However, it is possible that this figure could increase. By making travel by private car the more desirable option, people are likely to choose the private car over other options, thus increasing their transport emissions.
18. The document also suggests that the scheme will improve human health (page 11), and subsequently the document claims *"although there is no direct link between journey time saving and health, a new motorway would improve the driver experience and reduce driver stress."* (Page 21). Sustrans strongly refutes this statement - new roads are barriers to healthy lifestyles. Investment in major road schemes makes car use more desirable and therefore has the potential to discourage public transport use, cycling and walking – therefore meaning people are less physically active as part of their daily lifestyle.⁹
19. The current Strategic Environmental Assessment also highlights that poor health is often linked to poverty and goes on to state that a new relief road will improve health outcomes because it will increase access to employment sites and local amenities. In our *Access Denied: Transport Poverty in Wales* report, Sustrans highlighted that over a third of households in some parts of this area of Wales have no access to a car, with nearing two-thirds with only one car per household. The increasing costs of owning and running a car are exacerbating levels of transport poverty, and continued reliance on private vehicles for everyday transport will push even more people into debt.¹⁰
20. While Air Quality is scored as a positive 2 in the Strategic Environmental Assessment, we learn in the analysis that *"In the longer term, an increase in traffic is forecast, leading to increasing emissions and decreasing air quality."* (SEA: p14). This is compared to a negative in the 'Do Minimum' scenario. However, without proper analysis of a set of proposals designed to reduce car use and increase public transport uptake, this comparison is at best incomplete and, at worst, unhelpful and misleading.

⁷ http://www.foe.co.uk/cymru/english/press_releases/m4_consultation_failure_060213.html

⁸ Strategic Environmental Assessment, Non-Technical Summary, page 11

<http://www.m4newport.com/assets/issue-m4-sea-non-technical-summary---b2---publication.pdf>

⁹ <http://designinghealthycommunities.org/public-transportation-live-healthier-live-longer/>

¹⁰ Access Denied: Transport poverty in Wales [LINK](#)

21. We are concerned that the 'Mitigation' section of the SEA (page 12), takes a significant "wait and see" approach, rather than highlighting the steps that could be taken to reduce greenhouse gas emissions from transport in Wales. In particular, the section seems to suggest key factors are outside the competence of the Welsh Government. There is a strong reliance on monitoring after the building of a new road, rather than looking at what the impact on climate change is likely to be and developing a policy which seeks to reduce greenhouse gas emissions from transport.

22. We also share concerns that scores have changed between iterations of the SEA, without any reason given as to why, with many categories [Biodiversity, Soil, Material Assets, Water] moving to 'Minor Negative' from 'Major Negative'. Without information it is difficult to comprehend why these environmental concerns have been downgraded in such a short space of time, leading to an improved environmental score for the preferred option (which still comes out with an overall -2).

Conclusion

23. Sustrans Cymru believes that no strong economic case for a new M4 motorway running to the south of Newport has been made, but that 'congestion' on the existing M4 is the main reason provided, with a focus on air quality.

24. Because there has been no equivalent study focussing on improvements to public transport, walking and cycling, it is not clear that proposals have been drawn up which seek to minimise the impacts of transport on climate change in Wales. Indeed, the only comparison: between a major new motorway and a Do Minimum option, provides an incomplete conclusion.

25. Sustrans Cymru is concerned that the building of a new motorway south of Newport is a pre-determined Welsh Government view, and therefore other factors and options have not been fully considered.

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