

**P-05-850 Protect the Gwent Levels and stop the proposed M4 motorway –
Correspondence from the Petitioner to Committee, 21.11.18**

The Minister suggests that the Public Inquiry precludes any further examination of the arguments for and against the M4 Black Route. We believe, however, that the narrow remit of the PI meant that it was not adequate in itself in order to reach a consensus on the next sixty years of transport in Wales. The decision over the M4 has significance way beyond the immediate local issues of transport around Newport. An issue of this magnitude warrants as exhaustive a process of scrutiny as possible through fully informed debate by elected members of the Assembly.

We would therefore welcome an early opportunity to present our case to the Petitions Committee as part of the decision-making process within the Assembly as a whole. As well as our supporting statement, we also enclose CALM's press release issued at the end of last month when the Petition was transferred to the Assembly, and our bilingual leaflet issued earlier this year. We hope these will be useful to members of the Committee.

Best wishes,

Catherine and Rob



CAMPAIGN AGAINST THE LEVELS MOTORWAY

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P-05-850 - Pwyllgor Deisebau 27.11.18 / Petitions Committee 27.11.18

21st November 2018 - Response to the position of the Welsh Government Minister (Ken Skates AM) as communicated to the Petitions Committee on 6th November 2018.

The WG Minister suggests that the findings of the Public Inquiry (PI) will be sufficient for the Welsh Assembly to make its decision on the M4 Black Route. CALM believes that the PI process cannot be regarded as sufficiently objective or exhaustive. Our main reasons for stating this are as follows :

- The PI focused exclusively on a new stretch of motorway as a means of solving congestion, rather than looking even-handedly and fully at whether other transport options could meet this aim. The Welsh Government did not commission work to explore all options to tackle transport problems in South East Wales but instead relied entirely on the long-standing scheme to solve congestion by building more motorway capacity. In this sense we cannot agree with the Minister the PI 'robustly scrutinised all aspects of the proposals to address the problems of congestion on the M4.' The PI robustly scrutinised only the WG's own preferred solution.
- The Welsh Government's lawyers claimed that the Bushell principle meant that it was outside the remit of the PI to consider whether the Black Route was a wise use of government financial resources across the board. Those participating in the PI felt that it did not give proper consideration to evidence that questioned the need for a new motorway or which offered alternative approaches to transport infrastructure in general.
- Evidence given at the PI, and in particular the Welsh Government's own case, is already being superseded by new evidence. Since the PI closed, new evidence has come from several quarters to strengthen the case against the M4 Black Route. Above all, the Future Generations Commissioner for Wales, in partnership with the Centre for Transport and Society (CTS), University of the West of England, Sustrans and New Economics Foundation, published a major report in September 2018 which is highly critical of the Black Route. The report shows the Black Route would make many of the challenges facing Wales worse, including carbon emissions, physical and mental health, noise and air pollution, inequality and transport poverty. It would also contradict Wellbeing Objectives established in Local Wellbeing Plans (Cardiff, Newport and Monmouthshire). In fact the report found the case for building the Black Route relies on an assumption that time savings to individual drivers of between 2.5 and 5 minutes each day are worth **20 times more** than lowering carbon emissions, improving human health, reducing pollution and giving a fair transport deal for those on lower incomes. That's before any value is put on the unique wildlife and landscape of the Gwent Levels, and the ecosystem services it provides local people. The Commissioner proposed a package of public and active transport measures costing £578m (a quarter of the likely cost of the Black Route). This would meet the statutory wellbeing goals of the 2015 Act.
- In addition to the FGO report, the recent UN IPCC report warns that we have to halt devastating climate change by 2030. By that date and for many years to come the Black



The **Campaign Against the Levels Motorway** is an alliance of local people and organisations formed to protect the Gwent Levels from the proposed M4 Relief Road.

Route would be contributing thousands of tons of extra CO2 emissions in South Wales as the Government's own figures show. WG's only excuse - which many experts regard as highly dubious in itself - is that the M4 Black Route would become carbon neutral by 2078 i.e. in 60 years time. (This date of 2078 also assumes that the carbon gain will continue for 38 years beyond the date at which the UK Government states that petrol and diesel cars will have been phased out. This clearly makes no sense).

- Several of the recommendations in the report of the Assembly's own Economy, Infrastructure and Skills Committee in October 2018 on the State of Roads in Wales question the received wisdom on the Black Route. For example, the Committee recommends that building new roads should be a last resort, and the forthcoming Wales Transport Strategy should set a clear priority for maintaining the existing road network, mainstreaming and upgrading active travel infrastructure and prioritising access in preference to building new roads.

- There are also strong arguments emerging that point to how the Black Route would have little positive impact on the most economically disadvantaged areas of Wales, including those in the South Wales Valleys, and that some areas of South Wales would in fact be negatively affected by a new M4. South West England would instead be a major economic beneficiary.

- The costs of this project are rising on an almost daily basis and the figures used in the PI were already out of date. In 2015 the current First Minister said that the total costs would be "well under £1 billion". Under the Government's own figures this had risen to £1.3 billion by December 2017. In recent weeks it has been reported that WG civil servants have warned Welsh Ministers that **£2bn is now a minimum and the final price could rise to £2.5 billion**. In return for this colossal investment (and four or five years of disruption from construction works), peak M4 journey times around Newport would improve by an average of no more than **5 minutes**.

Until recently, a solution to congestion on the M4 has been seen as a local issue. But now it's become clear that the whole of Wales will be affected by the huge financial cost of the Black Route and that the environmental cost will reverberate across Wales and beyond. Wales has the opportunity, under the Wellbeing of Future Generations Act and the Environment Act, to ensure that on both economic and environmental grounds Wales is at the forefront of sustainable growth. The number of signatures on this petition – 12500 at the time of submission and now 15000 – testifies to the changing mood in Wales and the world.





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PRESS RELEASE – embargoed until 00:01 am, Wednesday 31 October 2018

12,000 SIGN PETITION AGAINST M4 BYPASS

The group campaigning against a £2 billion bypass through the Gwent Levels handed in a petition with over 12,000 signatories to the Welsh Assembly last week. This was 8 times the number on the petition supporting the bypass submitted by the S Wales Chamber of Commerce earlier this month.

The Petition calls on the Welsh Government to “**drop plans to construct the M4 motorway across the beautiful Gwent Levels and invest in public transport instead.**” It will now be considered by the Assembly Petitions Committee

CALM warns in the petition that “*The current plans to extend the M4 motorway would cut across the 'Amazon Rainforest' of Wales, the Gwent Levels, which is a haven for wildlife. If we want to protect the environment for future generations we need to come up with alternatives to big polluting motorways. The Assembly's own environmental regulator and advisory body, Natural Resources Wales, is against these plans.*”

Last month CALM endorsed the alternatives to the motorway recommended by the Welsh Future Generations Commissioner, Sophie Howe, which include boosting investment to ensure the Metro can improve access to jobs and leisure for the whole population in South Wales.

CALM Chair Rob Hepworth said “*Two Welsh Government expert advisory bodies are on the record in opposing the Black Route. We know Welsh Ministers have just been warned that even the estimated costs of an M4 bypass have more than doubled to over £2billion in the 3 years since 2015 when the First Minister assured the Assembly that it would be well under £1 billion. The names on the CALM petition have doubled in less than 3 weeks to over 12,000. There is now widespread public alarm about the costs and environmental damage of a bypass.*”

Catherine Linstrum (CALM) said “*For every person signing a petition in favour of the road, eight people signed the petition opposing it. That's a pretty strong sense that the public want things to change. They want smart solutions to transport, not more environmentally-damaging miles of concrete.*”

Hugh Mackay (Cycling UK) said “*It would be an utter waste of Wales investment budget which is needed for overdue projects right across our nation, including much more investment in active travel and public transport to benefit our whole population over the next 50 years.*”



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Vic Warren (Vice Chair of the Campaign for the Protection of Rural Wales) added “ *The Assembly’s own cross-party Economy & Infrastructure Committee of the Welsh Assembly has now recommended that building new roads should be a last resort, and that maintaining the current road network - including active travel routes - should be the priority for a sustainable transport policy. The Government need to take the repeated advice from independent advisers and the Assembly Committee seriously and rule out the Black Route without forcing us to take the issue to Court*”.

Ian Rappel (CEO of Gwent Wildlife Trust) said “ *Even without the damage to the Gwent Levels, the rising costs and poor economic and transport case for the Black Route are persuading many people to oppose it. When the damage to priceless and irreplaceable wildlife is added, the arguments are frankly overwhelming. The Black Route is the wrong choice for wildlife and people*”

Background: The evidence against the Black Route has been piling up throughout 2018. CALM estimates that its final costs could top £2 billion. From this almost £200 million will be spent on repairing unnecessary damage from driving the bypass through Newport Docks.

As the Future Generations Commissioner’s report ¹showed last month, the Black Route is incompatible with the need to address climate change seriously. Wales’ targets to reduce carbon emissions are being missed because we have become too dependent on cars². The United Nations Report published in early October by IPCC warned Governments that they must decide carbon emissions (to which the Black Route would add 500,000 tonnes) immediately to prevent dangerous global warming³. Last week’s report by the Assembly’s Economy, Infrastructure and Skills Committee under the Chairmanship of Russell George AM advised that “*every new road project should be subject to challenge to ensure the Well-being of Future Generations Act has been rigorously applied in the scheme.*” and recommended that “*the forthcoming Wales Transport Strategy should set a clear priority for maintaining the existing road network, mainstreaming and upgrading active travel infrastructure, and prioritising access, in preference to building new roads.*”

Sophie Howe’s report in September 2018 exposed the flawed assumptions made by the recent Public Inquiry, which failed to examine **any** alternatives properly, in breach of Welsh legislation protecting the wellbeing of future generations. Her report found the case for building the Black Route relies on an assumption that time savings to individual drivers of between 2½ and 5 minutes each day are worth **20 times more** to society than a combination of lowering carbon emissions, improving human health, reducing pollution and giving a fair deal for those on lower incomes. And that’s before any value is put on the unique wildlife and landscape of the Gwent Levels, and the ecosystem services it provides local people !

CALM’s petition is still open for signatures on the 38 Degrees site
- <https://you.38degrees.org.uk/petitions/stop-the-proposed-m4/>

¹ ‘Transport Fit for Future Generations’ by Future Generations Commissioner for Wales, September 2018.

² Decarbonising Transport in Wales, Institute of Welsh Affairs, June 2018
http://www.iwa.wales/wp-content/uploads/2018/06/IWA_Decarbonising_Transport-1.pdf

³ See for example <https://www.vox.com/2018/10/8/17948832/climate-change-global-warming-un-ipcc-report>

caim #NoNewM4

<https://savethelevels.org.uk/>

Traffic congestion on the M4 at Newport and across the area is a serious economic and health problem.



Building an expensive new motorway across the Gwent Levels will not solve the problem. We need a progressive, imaginative solution for transport around Newport and across Wales, to take the Welsh economy forward and solve transport issues for a generation. We ask our politicians to:

- provide effective, efficient and affordable public transport systems across Wales,
- ensure effective traffic management on the existing M4 and in Newport,
- develop a comprehensive transport system that meets our needs and the legal requirements for clean air,
- reduce CO₂ emissions, to comply with the Welsh Government's commitments,
- ensure the Welsh Government complies with its own Environment Act and Well-being of Future Generations Act,
- provide solutions which don't damage internationally and nationally important wildlife habitats.

Economics

- The Black Route will eventually cost £2 billion or more, including nearly £200 million to compensate Newport docks, and is equivalent to 7 new hospitals, 40 new secondary schools or 150 new primary schools.
- £2 billion exceeds the annual Wales education budget and is twice the annual budget for economy and transport. £2 billion is far too much for Wales to spend on a road which will not solve our transport problems nor help small businesses.

Landscape & Wildlife

- The Gwent Levels are nationally important for wildlife. Four SSSIs plus ancient woodlands will be severely damaged or destroyed. Over 35% of the Levels have already been lost to the steel works, the Second Severn Crossing, distribution centres and retail parks. This nationally important wetland landscape and its rare and sensitive species cannot afford further losses.
- The new M4 will have embankments of up to 18 metres dominating the landscape. That's the equivalent of a six-storey house or higher than the church at Magor.

Noise and Air Pollution

- The UK Highways Agency and Transport Scotland classify homes as having 'high' sensitivity to noise. The Welsh Government classifies homes as having 'medium' sensitivity, so imposing higher noise levels on Welsh homes than Scottish or English homes.
- The additional road traffic will produce even greater quantities of hazardous air pollutants including carbon monoxide, nitrous oxides, volatile organic compounds (VOCs), ozone and particulates.

Climate Change

The construction alone will generate vast additional CO₂ emissions. The finished road, using realistic traffic projections, will every year produce significant extra CO₂ emissions in Wales, further contributing to climate change. This makes it even more difficult to meet targets to limit global warming and is contrary to the Welsh Government's own transport planning strategy, its Well-being of Future Generations Act, its Environment Act and Natural Resources Wales objections.

HOW YOU CAN HELP

Please tell the Welsh Government and your Assembly members that the road is unacceptable and that less costly, more efficient alternatives are available. They could prioritise sustainable transport across Wales and take effective steps to ease traffic flows on the existing M4. Investment in the South Wales Metro, new North/South rail connections, other public transport measures, such as priority bus lanes, car share lanes or Park-and-Ride schemes, and active traffic management would all help solve the problems. The more letters they get, the more likely it is we can stop the road. Don't let them take the easy, failed option of building more roads – we deserve better from our elected representatives and for our children:

- Write to your Assembly Members. You have one Constituency AM and four Regional AMs representing you. Write to them all using www.writetothem.com,
- Visit your local Assembly Member's constituency surgery,
- Ken Skates AM is the Welsh Government Secretary for Economy and Transport. Write to him at: Correspondence.Ken.Skates@gov.wales,
- If you are a member of a local group that would be affected by the road, get the group to write to the Welsh Government,
- Support the Gwent Wildlife Trust campaign: <http://www.gwentwildlife.org/how-you-can-help/m4-relief-road-help-us-protect-gwent-levels>
- Support the Friends of the Earth campaign: <http://www.foe.cymru/resources>
- Support CALM, the Campaign Against the Levels Motorway: [@CalmCampaign](https://www.facebook.com/campaignagainstthelevelsmotorway/) on Twitter and <https://www.facebook.com/campaignagainstthelevelsmotorway/>
- Support the RSPB campaign by contacting: campaigns.wales@rspb.org.uk and visiting: <https://www.rspb.org.uk/our-work/our-positions-and-casework/casework/cases/m4-motorway-diversion/>

Mae tagfeydd traffig ar yr M4 yng Nghasnewydd ac ar ledled yr ardal yn broblem economaidd ac iechyd difrifol.



Ni fydd adeiladu traffordd newydd ddrud trwy Wastatiroedd Gwent yn datrys y broblem. Mae angen datrysiad blaengar, dychmygus arnom ni am drafndiaeth o amgylch Casnewydd a ledled Cymru, er mwyn gwthio economi Cymru ymlaen ac er mwyn datrys problemau trafndiaeth am genhedlaeth. Rydym yn gofyn i'n gwleidyddion i:

- gynnig systemau trafndiaeth gyhoeddus effeithiol a fforddiadwy ledled Cymru,
- sicrhau rheolaeth draffig effeithiol ar yr M4 sy'n bodoli eisoes ac yng Nghasnewydd,
- datblygu system drafndiaeth gynhwysfawr sy'n cwrdd â'n anghenion yn ogystal â'r gofynion cyfreithlon am awyr glân,
- leihau allyriadau CO₂, er mwyn cydymffurfio ag ymrwymadau Llywodraeth Cymru,
- sicrhau bod Llywodraeth Cymru'n cydymffurfio â'i Ddeddf Amgylchedd a'i Ddeddf Llesiant Cenedlaethau'r Dyfodol ei hun,
- gynnig datrysiadau sydd ddim yn niweidio cynefinoedd bywyd gwyllt sy'n bwysig yn rhyngwladol yn ogystal â chenedlaethol.

Economeg

- Bydd y Llwybr Du yn y pen draw'n costio £2 biliwn neu fwy, gan gynnwys bron £200 miliwn er mwyn digolledu dociau Casnewydd, sy'n gyfwerth â 7 ysbty newydd, 40 ysgol uwchradd newydd neu 150 ysgol gynradd newydd.
- Mae £2 biliwn yn fwy na chyllideb addysg flynyddol Cymru ac mae ddwywaith y gyllideb flynyddol am yr economi a thrafndiaeth. Mae £2 biliwn llawer gormod i Gymru wario ar ffordd ni fydd yn datrys ein problemau trafndiaeth neu'n helpu busnesau bach.

Tirwedd a Bywyd Gwyllt

- Mae Gwastatiroedd Gwent yn bwysig i fywyd gwyllt ar lefel cenedlaethol. Bydd pedwar SoDdGA yn ogystal â choetiroedd hynafol yn cael eu difrodi'n ddifrifol neu eu dinistrio. Mae dros 35% o'r Gwastatiroedd eisoes wedi'u colli i'r gwaith haearn, yr Ail Groesfan Hafren, canolfannau dosbarthu a pharciau manwerthu. Ni all y dirwedd genedlaethol bwysig hon a'i rywogaethau prin a sensitif fforddio colledion pellach.
- Bydd gan yr M4 newydd argloddiau o hyd at 18 metr a fydd yn dominyddu'r tirlun. Mae hynny'n gyfwerth â thŷ chwe llawr neu'n uwch na'r eglwys ym Magwyr.

Llygredd Sŵn ac Aer

- Mae Asiantaeth Priffyrdd y DG a Thrafndiaeth yr Alban yn dynodi cartrefi fel cael sensitifedd 'uchel' i sŵn. Mae Llywodraeth Cymru'n dynodi cartrefi fel cael sensitifedd 'canolog', ac felly'n gosod lefelau sŵn uwch ar gartrefi Cymreig na chartrefi Albanaid neu Saesneg.
- Bydd y traffig ychwanegol yn creu symiau llygryddion aer sydd hyd yn oed yn uwch gan gynnwys carbon monocsid, ocsidau nitrus, cyfansoddion organig anwedol (VOCs), oson a gronynnau.

Newid yn yr Hinsawdd

Bydd yr adeiladwaith yn unig yn creu allyriadau CO₂ ychwanegol enfawr. Bydd y ffordd orffenedig, gan ddefnyddio rhagamcaniadau traffig ymarferol, yn cynhyrchu allyriadau CO₂ ychwanegol sylweddol bob blwyddyn yng Nghymru, gan gyfrannu ymhellach at newid yn yr hinsawdd. Bydd hyn yn ei gwneud hi'n anoddach fyth i gwrrd â thargedau sy'n lleihau cynhesu byd eang ac yn groes i strategaeth gynllunio trafndiaeth Llywodraeth Cymru, ei Ddeddf Llesiant Cenedlaethau'r Dyfodol, ei Ddeddf Amgylchedd a gwrthwynebiadau Cyfoeth Naturiol Cymru.

SUT ALLWCH HELPŪ

Dwedwch wrth Lywodraeth Cymru a'ch aelodau Cynulliad bod y ffordd yn annerbyniol a bod dewisiadau amgen llai drud a mwy effeithiol ar gael. Gallant flaenoriaethu trafndiaeth gynaliadwy ledled Cymru a chymryd camau effeithiol i leihau llif traffig ar yr M4 cyfredol. Buasai buddsoddi ym Metro De Cymru, cysylltiadau rheilffordd Gogledd/De, mesurau trafndiaeth gyhoeddus eraill, megis lonydd bws, lonydd rhannu car neu gynlluniau parcio a theithio, a rheolaeth traffig gweithredol i gyd yn helpu datrys y problemau. Y mwy o lythyrau y maent yn eu derbyn, y mwy tebygol yw e y gallwn ni atal y ffordd. Peidiwch adael iddynt gymryd yr opsiwn hawdd sy'n methu o adeiladu mwy o ffordd – rydym yn haeddu gwell o'n cynrychiolwyr etholedig ac i'n plant:

- Ysgrifennwch at eich Aelodau Cynulliad. Mae gennych chi un AC Etholaethol a phedwar AC Rhanbarthol sy'n eich cynrychioli. Ysgrifennwch atyn nhw i gyd gan ddefnyddio www.writetothem.com,
- Ymwelwch â meddygfeydd etholaethol eich Aelod Cynulliad lleol,
- Ken Skates AC yw Ysgrifennydd Llywodraeth Cymru dros Economi a Thrafndiaeth. Ysgrifennwch ato yma: Correspondence.Ken.Skates@gov.wales,
- Os ydych chi'n aelod o grŵp lleol a fydd yn cael ei effeithio gan y ffordd, gofynnwch i'r grŵp ysgrifennu at Lywodraeth Cymru,
- Cefnogwch ymgyrch Ymddiriedolaeth Natur Gwent: <http://www.gwentwildlife.org/how-you-can-help/m4-relief-road-help-us-protect-gwent-levels>
- Cefnogwch ymgyrch Friends of the Earth: <http://www.foe.cymru/resources>
- Cefnogwch CALM, y "Campaign Against the Levels Motorway": [@CalmCampaign](https://twitter.com/CalmCampaign) ar Twitter a <https://www.facebook.com/campaignagainstthelevelsmotorway/>
- Cefnogwch ymgyrch yr RSPB gan gysylltu â: campaigns.wales@rspb.org.uk ac ymwelwch â: <https://www.rspb.org.uk/our-work/our-positions-and-casework/casework/cases/m4-motorway-diversion/>