

The **Campaign Against the Levels Motorway (CALM)** is a voluntary alliance of local people and organisations formed to protect the Gwent Levels from the proposed M4 Relief Road. We are heavily engaged in the current debate about the M4, and do not have the resources to prepare a more tailored response to the consultation on roads.

However CALM Members do feel that the Committee's work on this topic is potentially valuable, and that our views and experience are relevant to your remit, particularly the question of "*whether major enhancement projects on the local road, trunk road and motorway network are prioritised, funded, planned and delivered effectively, and provide value for money.*" CALM believes that the Government's M4 Black Route proposals would, if approved, represent a major misuse of public resources on a scheme which will fail to deliver VFM for transportation and the economy in South Wales, cause unjustified environmental damage, and fail to meet the requirements of binding international, UK and Welsh legislation, including the Wellbeing of Future Generations Act.

We therefore resolved at our meeting last night to respond to the consultation by submitting three documents we produced earlier this year:

1. A comprehensive brief sent to all AMs (January 2018);
2. Our closing statement to the M4 Planning Inquiry in March 2018
3. A new letter sent to AMs earlier this week focussing on the transport arguments

We hope these documents will also be useful to the Committee's work on the State of Roads in Wales. Recent discussions in the Senedd suggest that the Government is becoming more aware of the need for a multifaceted approach to transport in SE Wales, and we therefore hope that the alternatives suggested in in the final paragraph of our closing statement will now be seriously considered in place of a proposal which is outdated, damaging, potentially unlawful and an unjustifiable use of scarce public resources for investment in Welsh infrastructure.

Kind regards

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## CAMPAIGN AGAINST THE LEVELS MOTORWAY

### The case against the M4 Relief Road – summary

#### **1. Road building does not solve congestion – it shifts the problem.**

Whilst it seems common sense that building a road reduces congestion, the reality is that it does not work like that. Induced traffic quickly erodes any benefits of additional capacity, whilst the knock-on effects for the rest of the road network more than outweigh any immediate gain.

#### **2. New roads do not necessarily lead to economic development.**

The public perception is that building roads encourages inward investment, creates jobs and boosts the economy. Road building, however, does not help the economy as much as other forms of infrastructure investment.

#### **3. Government modelling and costings are flawed.**

Analysis of the Government's figures on economic benefits, safety issues, traffic forecasts and environmental damage reveal that benefits have been exaggerated and negative impacts underplayed.

#### **4. Urban transport is changing.**

Like the dual carriageways and multi-storey car parks in city centres, infrastructure endures. Once built, it constrains transport choices for generations. If we are to avoid ever increasing car-dependency we need to start making changes now.

#### **5. The vast cost will limit government expenditure across Wales for many years.**

The scheme has been costed at £1.2bn – but that excludes inflation since 2009, VAT, interest payments, cost over-run (which is normal in projects of this nature) and the recent deal with ABP, which has added £136m. We might reasonably assume a cost of nearly £2bn.

#### **6. Alternatives have not been considered evenly or symmetrically.**

The M4 saga has always focused on building a new road, with alternatives only being considered *after* the preferred M4 relief road scheme was already well established. This is not how the planning of major infrastructure schemes should work.

#### **7. Carbon emissions need to be reduced and air quality improved.**

It is clear that the world is facing catastrophic climate change unless existing carbon-reduction targets are met. However, there is a growing gulf between rhetoric and action. It can no longer be claimed that environmental destruction has to be accepted as the unfortunate by-product of economic progress.

#### **8. The scheme has an unacceptable impact on the environment and our cultural heritage.**

The proposed M4 relief road is a six-lane motorway that will cover over 10km of nationally important wetland SSSIs with tarmac and concrete, whilst also polluting and profoundly disrupting the habitats across the remainder of the Gwent Levels.

## **1 Road building does not solve congestion – it shifts the problem.**

Whilst there is obvious public concern about congestion on the M4 at Newport, an M4 relief road will not solve the problem. In fact, it will exacerbate the problem by:

- concentrating on road transport at the expense of all other modes of transport;
- creating induced traffic and creating more congestion;
- moving congestion to other parts of the network such as Cardiff.

Welsh Government modelling takes account of ‘induced traffic’ but it underestimates significantly the likely scale of this. New roads create new bottlenecks, make public transport less attractive and disadvantage pedestrians and cyclists. Roads are built (at huge financial and environmental cost) but journey times do not improve. It is important to note that the Government’s expected journey time savings are only 4-9 minutes, and the average speed on this stretch of road even at peak times is already nearly 50mph.

For over 50 years, research has shown that building roads does not speed traffic or ease congestion (see Buchanan 1963;<sup>1</sup> SACTRA 1999;<sup>2</sup> and the Proofs of Evidence to the Public Inquiry (hereafter PoE for PI) of Professor John Whitelegg and Dr Steve Melia). Unfortunately, traffic growth modelling could not be explored at the Public Inquiry because it was deemed to be beyond the Inquiry’s remit.

Delays on motorways are not confined to the M4 at Newport, despite this having become the main focus of frustrations about congestion in south Wales. Events, accidents and other factors will always cause delays on roads. All major roads experience delays during the rush-hour; this is inevitable and cannot be eliminated by road-building.

Congestion on the M4 at Newport is a local transport problem, because the M4 at Newport was built with five junctions (whereas at Cardiff it was built with two junctions). Between 17% and 48% of traffic on the existing M4 at Newport is local. Newport has become a particularly car-based city; it is one of very few cities in the UK to have removed bus lanes and it has little in the way of plans for traffic reduction. This needs to change (see PoE for PI, Friends of the Earth Cymru).

The M4 relief road was conceived in another era – prior to our understanding of climate change, environmental degradation and the availability of sustainable alternatives – and now is the time for Wales to move on from the self-fulfilling prophecy of ‘predict and provide’.

## **2 New roads do not necessarily lead to economic development.**

Despite the CBI’s unfounded assertions, there is little evidence that road building assists the economy in areas with a well-developed road network like south Wales. In contrast, it can damage economic prospects, as seen by Welsh road improvements leading to the Royal Mail moving from Llandudno to Chester with the improvement

of the A55, and the creamery at Whitland closing when it became viable to drive milk lorries to Swindon. Road building in the Valleys has not automatically led to economic development for the area. Roads shift economic activity, but often in unpredictable ways, and often causing outward commuting rather than inward investment. It is striking that Welsh Government's own analysis of the M4 Black Route shows about a third of the economic benefit going to south-west England.

Investing in road building is not the most effective use of government funding if one wants to boost the economy. Investing in cycling and walking commonly has a Benefit Cost Ratio of nearly triple that of this road. There is a growing body of evidence that taming traffic actually leads to economic growth.

The key factors in Wales' future economic performance are skill and education levels, its elderly population and its rural nature. This road addresses none of these, which is what public investment should address (see PoEs for PI of Professor John Whitelegg and Professor Calvin Jones). As Professor Calvin Jones has stated (PoE for PI), there is 'zero substantial evidence that a problem with road connectivity is a significant downward pressure on economic or employment growth in the region.'

### **3 Government modelling and costings are flawed.**

The Government's data presented at the Public Inquiry is based on flawed assumptions – in that it gives insufficient weight to environmental costs and overstates economic benefits (see Professor Phil Goodwin's work and his evidence to the NAW Environment Committee).<sup>3</sup>

Crucially, it under-estimates the scale of induced traffic, which is a common effect of new road schemes. The recent report by the Campaign for the Protection of Rural England (CPRE) found that traffic increased considerably in excess of how this had been forecast – by up to 47% (over and above background traffic increases) over 20 years on the 80 road scheme evaluations which it examined.<sup>4</sup>

Claimed journey saving times in similar schemes routinely turn out to be lower than forecast. Furthermore, the Government costing of the scheme is based on an average UK value of time which assumes that all journeys are of economic value or have a negative economic impact if delayed. This is clearly spurious and doesn't take into account the leisure journeys – visiting family or friends, for example – where a delay to the journey would be an irritation but have no economic impact. The Government's costings fail to take into account the fact that a significant percentage of journeys on the existing M4 are local.

The Government has labelled the M4 at Newport as an accident-prone stretch of motorway when in fact its own figures, as presented to the PI, show that accident levels are below the UK average; there is no evidence that a new road would be safer.

### **4 Urban transport is changing.**

Cars took over our streets and cities in the last century. But new technologies, including electric and autonomous vehicles and e-bikes – combined with the imperatives to change (climate change, obesity, etc.) – will transform our car culture. Shared car ownership is growing. Whilst the population is increasing, car use per person has been declining since 2000; this decline in commuting journeys per person

has not been outweighed by the growth in population.<sup>5</sup> We can see this at a cultural level too, with a decline in the significance of the car as a status symbol and as a symbol of transition to adulthood.<sup>6</sup>

There is a future which embraces very different options for transport and public space, but development of the M4 relief road and the Public Inquiry have not taken proper account of them. This is not the case in many other nations and regions in Europe, where road-building is no longer seen as a way to resolve transport problems. We need sustainable transport, available to all (see PoI for PI of Professor Terry Marsden, Professor Lorraine Whitmarsh and Professor Calvin Jones).

All this remains largely ignored by the system for transport planning that the Welsh Government inherited from the Welsh Office. Whereas transport planners are alert to these changes, the M4 scheme has been designed and promoted by a consortium (Costain and Vinci) of construction firms and consultants that stand to benefit commercially from contracts should the scheme proceed. Most of the Government's witnesses at the Inquiry were employed by this consortium or its consultants, and the Government's own team has co-located to the same office 'to maximise collaboration'. This context is far from conducive to achieving the best outcome for Wales. Rather, it is delivering the best result for the consortium.

## **5 The vast cost will restrict government expenditure across Wales for many years.**

The Government has borrowing powers for all capital expenditure of up to £1bn – on which interest will be payable. The remainder will be met from the capital budgets for the economy, science and transport. In other words, capital spending across Wales will be reduced significantly to fund this road. Investment in other areas would probably yield better returns for the Welsh economy.

Drawing money away from other government schemes means that some of these may have to be funded by a Public Private Partnership (PPP). This is likely to cost the Government three to four times as much: the Second Severn Crossing cost three times the construction cost and the A55 Expressway on Anglesey four times the construction cost.

## **6 Alternatives have not been considered evenly or symmetrically.**

Against the spirit and letter of the planning framework for new roads (WelTAG and WebTAG), the Welsh Government – and the Welsh Office before it – have not sought to focus on an integrated package of options to address needs. Rather, alternatives have been considered in only a cursory way and after the proposed scheme has been developed.

Such a package of measures which do not cost the earth include:

- the South Wales Metro;
- rail electrification;
- bus lanes;
- light rail and trams;
- more integrated public transport;

- reduction of single car occupancy by car sharing;
- workplace parking levies (as in Nottingham);
- rail freight;
- changes to M4 junctions (and other M4 traffic management strategies);
- less destructive road schemes (including the Blue Route);
- congestion charging;
- measures to reduce the need for travel (including the location of new developments, and support for home-working and the virtual economy);
- active travel, especially for the large proportion of short journeys.

Active travel – making walking and cycling more attractive as a means of transport – has widespread support and is highly cost effective. It addresses the major health issues that arise from a sedentary lifestyle of driving and sitting in front of a screen. Switching from a car commute to active travel reduces obesity and stress levels and also reduces incidence of cardiovascular disease and cancer – connecting with the Government’s health policies.

Not a great proportion of traffic has to be shifted to other modes of travel to reduce traffic on the M4 to an acceptable level. Indeed, as so much of peak-time traffic on the M4 at Newport is local (i.e. 15 miles or less), alternative modes of local travel could bring about a huge reduction in motorway traffic levels. Such a shift accords with the Wales Transport Strategy and the Transport section of the Natural Resources Policy<sup>7</sup> (and see the PoE for PI of Professor Stuart Cole, the Future Generations Commissioner, Professor Lorraine Whitmarsh, Professor John Whitelegg and Professor Terry Marsden).

## **7 Carbon emissions need reducing and air quality needs improving.**

The Government is required and committed to reduce greenhouse gas emissions by 80% by 2050 (against 1990 levels). Transport costs are 25% of our CO2 emissions and rising, with transport the main sector threatening achieving our CO2 targets. To achieve the mandatory target we need to electrify the fleet and reduce car miles by 5%. Increasing road capacity is at odds with this. Even the most optimistic forecasts, commissioned by the Welsh Government, suggest that this road will not have made a net contribution to carbon emissions until 2072 at best. Furthermore, Professor John Whitelegg (in his PoE for the PI) calculates that the carbon footprint of the road will be nearly double the Government’s estimate. The construction and use of this road will move us in the wrong direction, at great financial and environmental cost (see PoE for PI of Professor Kevin Anderson).

Wales has its own legislation prioritising these matters, led by the late Carl Sergeant, notably the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016. The Wales Transport Strategy, too, seeks to shift travel away from cars to reduce environmental impact.

Our towns and cities have a serious problem with air quality. In Wales, many areas exceed World Health Organisation guidelines, and Cardiff has one of the worst levels of air quality in the UK. In Wales, about 1,200 deaths are caused by air pollution; about half of this pollution can be attributed to road transport. This will worsen with a new motorway which will increase traffic, with most of these journeys starting or finishing in urban areas.

## **8 The scheme has an unacceptable impact on the environment and our cultural heritage.**

The latest ‘State of Nature’ report<sup>8</sup> shows that Wales is in the top quarter for biodiversity loss out of the 218 nations assessed. The Government’s Natural Resources Policy, produced this year, highlights the need to reverse this loss of biodiversity – yet this road scheme would inflict further detrimental impacts. The Government needs to be clear what level of environmental destruction and species decline it is trying to achieve – because there is a clear disjuncture between its environmental policies and this road proposal.

This scheme would slice through four nationally important Sites of Special Scientific Interest. It would also cut across part of Magor Marsh Nature Reserve. It is not possible to move or re-create these habitats in any meaningful or realistic way; nor can any measures ‘mitigate’ for the destruction of the ancient reed system of the Gwent Levels, and the outlying areas of ancient woodland which also lie along the route. As Professor Sir John Lawton FRS stated in his evidence to the Public Inquiry (see his PoE for the PI), the mitigation measures are ‘scientifically unproven and in some cases appear impossible.’

Some opponents of the Black Route support the alternative Blue Route, on the grounds that it is less environmentally destructive and, were it planned and costed as has been the Black Route, would be more cost effective.

The Gwent Levels are also a Landscape of Outstanding Historical Interest with a wealth of features reflecting its farming and occupation in pre-Roman and Medieval times. This assemblage of cultural and natural heritage makes the Gwent Levels unique, and the most important wetland landscape in Wales. This is an asset which needs our stewardship, for its own sake and for the benefits it brings communities and the local and national economy. This is our equivalent of the Amazon rainforest, for which we are responsible – it is unacceptable to drive a motorway through it.

The Government’s M4 proposal runs counter to the Welsh Government’s core policies on sustainability,<sup>9</sup> transport<sup>10</sup> and the environment,<sup>11</sup> as has been stated by the Government’s Future Generations Commissioner, who has objected unequivocally to the proposals because they do not meet the basic requirements of the Well-being of Future Generations Act (2015). This means the proposal risks being declared unlawful.

The Black Route is an outdated response to our transport needs, a thoughtless continuation of the constant road-building that went hand in hand with rising congestion throughout the 20<sup>th</sup> Century. There is an opportunity now for Wales to take the lead in the United Kingdom and beyond by investing in future-proof, sustainable transport solutions for this generation and those to come.

## **References**

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<sup>1</sup> Colin Buchanan (1963) *Traffic in Towns*. Ministry of Transport.

<sup>2</sup> The Standing Advisory Committee on Trunk Road Assessment (SACTRA) (1994) *Trunk Roads and the Generation of Traffic*. Department for Transport.

<sup>3</sup> See his publications:

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<https://scholar.google.co.uk/citations?user=3hF5I4oAAAAJ&hl=en>

and his appearance at the Senedd committee:

<http://www.senedd.assembly.wales/ieListDocuments.aspx?MIId=2025>

<sup>4</sup> Based on an analysis of 86 road schemes, using official data from the Post Opening Evaluation (POPE) reports. As well as under-estimating induced traffic, schemes consistently over-estimated their economic benefits. CPRE (2017) *The End of the Road* CPRE, London.

<sup>5</sup> Department for Transport (2016). *Road Use Statistics Great Britain 2016*.  
<https://www.licencebureau.co.uk/wp-content/uploads/road-use-statistics.pdf>

<sup>6</sup> Department for Transport (2015) Understanding the drivers of road travel: current trends in and factors behind roads use. <https://www.gov.uk/government/publications/understanding-the-drivers-of-road-travel-current-trends-in-and-factors-behind-roads-use>

<sup>7</sup> <http://gov.wales/docs/desh/publications/170821-natural-resources-policy-en.PDF>

<sup>8</sup> Wildlife Trusts Wales (2016) [State of Nature 2016](#).

<sup>9</sup> See Proof of Evidence for Public Inquiry of the Future Generations Commissioner. All Proofs of Evidence for the Public Inquiry are available on the Persona M4 PI website <http://m4-newport.persona-pi.com/d-poe-op>

<sup>10</sup> Notably the Wales Transport Strategy and the Active Travel (Wales) Act 2013.

<sup>11</sup> Environment (Wales) Act (2016) and the Well-being of Future Generations Act (2015).



CALM is an umbrella organisation of local people and organisations formed to protect the Gwent Levels from the proposed M4 Relief Road.





CAMPAIGN AGAINST THE LEVELS MOTORWAY

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## **CALM CLOSING STATEMENT TO THE PUBLIC INQUIRY INTO THE PROPOSED M4 CORRIDOR AROUND NEWPORT, 28 MARCH 2018**

We are approaching a decisive juncture in a discussion which started before this century began. It is much more than a debate about the route of a bypass. It is a fundamental disagreement about how we should invest enormous amounts of time and money in our future transport infrastructure to make it fit for purpose, including for future generations as well as our own. It is about whether we are serious about combating climate change, and anticipating a world where more and more access and communication will be digital. This must be a world where we do have time to “stand and stare”, in the words of Newport’s own ‘poet laureate’ WH Davies. Our descendants deserve to appreciate the tranquility and beauty of the Gwent Levels bequeathed to us by centuries of interaction between humans and nature, which for many in our area are “a place for the soul to find peace” (*Lle i enaid gael llonydd*).

Are we going to move forward to a sustainable era where our transport systems are designed to serve the needs of all our people - young and old, richer and poorer, drivers and non drivers ? To an era where transport contributes to our health as citizens and allows us genuine mobility and access to our families, our jobs, our friends, our favourite

places and the goods we need ? Or are we going to engage reverse gear by adopting the transport solutions of the past ? Are we really willing to squander up to £2 billion on a bypass to an existing motorway demanded largely by big business and some commuters, who want faster journeys but will actually end up causing even more congestion as well as irreparable damage to the unique and historic landscape of the Gwent Levels and its communities?

In the first phase of the Inquiry last year CALM and other objectors set out strong arguments against the Black Route - flawed traffic forecasts, unacceptable capital costs, simplistic assumptions that a new road will benefit the Welsh economy, underestimated environmental impacts, contradictions with carbon reduction targets and a hugely unbalanced focus on just one region of Wales.

When the Inquiry resumed at the end of January we learned that our case had actually been strengthened by the mysterious, secret deal between the Government and the private company which runs Newport Docks, under which their objections would be withdrawn in return for colossal compensation and associated costs totalling close to £200 million from public funds, in order to remodel the Docks to fit in with the Black Route. There has been no public scrutiny of how this deal was done, or how the detailed costs are calculated. It is called compensation but we should call it out for what it is - a backroom deal in the worst tradition of “public-private partnership” in which the owners held all the cards. They are set to extract an eye-watering sum of Welsh taxpayers’ money to benefit company shareholders. Such a deal may also be in breach of EU regulations about state support for industry.

During the last two months CALM supporters have been able to deploy yet further arguments against the Black Route. We have exposed the clear intention of the Welsh Government to resist stronger statutory protection for the remaining Gwent Levels and the willingness of their representatives at the Inquiry openly to condone their further decimation not only for the by-pass itself but also for the urban ribbon development

which will follow once the new road is opened. The Inquiry has heard evidence showing that the by-pass route is in clear breach of national legislation and international wildlife treaties to which the UK is a party because of its destruction of a huge area of designated wetland and breeding sites for migratory species such as cranes and bats. We heard the Government's consultant admit that he only had 25% confidence in his own proposals to mitigate the damage to bats, and we suspect this would be an all-too-accurate prediction of the likely success of their "motorway mitigation measures" in many other areas, including SSSIs.

We have heard the Government's representatives casually accept that they will not allocate significant resources to compensate properly for the damage which they accept that the Black Route will inflict on the highly sensitive, historic landscape of the Gwent Levels, affecting forever the communities who live there and the thousands of visitors who seek quiet recreation, including cyclists and walkers. We have heard that the abolition of the Severn tolls this year will increase traffic but that there will be no relief at all until the bypass opens in more than 5 and a half years time - in December 2023. This date has slipped by a further two years mainly as a result of the deal at Newport Docks. It now compares very unfavourably with Professor Stuart Cole's relief road proposals using upgraded existing roads round Newport (the "Blue Route") which could be running by the end of 2020 even after allowing for a further Inquiry.

Last week we heard a very clear statement from the Government's statutory environment adviser and agency, NRW, that they strongly maintained several key objections to the Black Route. Notably, NRW lawyers have said that WG are breaching both UK and Welsh legislation because the level of destructive impact on the Gwent Levels SSSIs is "too great" and "unprecedented". NRW add that "a total land SSSI land take of 105 ha. is manifestly excessive and evidence for a breach of Section 28 G (of the Wildlife and Countryside Act 1981)".

There are now two Welsh Government-appointed, expert bodies formally objecting to the WG proposals for the Black Route. Last year the Future Generations Commissioner, Sophie Howe, specifically objected to the Black Route and submitted extensive evidence to demonstrate that the proposals do not meet the the legal requirements of recent legislation - the Wellbeing of Future Generations Act 2015. These Objections from official bodies increase the risk that the Black Route proposals will be declared unlawful, even if the Planning Inquiry and Welsh Government Ministers approve the scheme.

All the weaknesses in the Black Route proposals have been pointed out repeatedly over the period of the Planning Inquiry. CALM and its supporters have deployed more than 20 respected scientists, economists and planners, whose evidence has shredded the case for the Black Route. In response hardly any independent experts have actually given evidence in support of the Government's case, which has largely been made by their own consultants, employed solely to support the Black Route. The Government seems to have decided that objective experts in a well-trodden field are unlikely to support its case.

Many local Community Councils and individuals have sent detailed objections. So has the Wales Federation of Small Businesses which also commented memorably in 2015 that the money saved from “ the £1 billion piece of tarmac” could and should be used to support skills and improve other transport links across Wales. That same year the First Minister claimed that the cost of the bypass would be “nowhere near” £1 billion and in his opinion “well below” that figure. Yet we are now at the end of a Planning Inquiry less than three years later where the figure of £1.5 billion is generally accepted as the current cost without adding VAT or allowing for cost overruns which are so commonplace on this type of scheme - 24% on the Heads of the Valley Road to quote from recent revelations.

We affirm our belief, based on more than a year of evidence at the Inquiry, that the Black Route is unjustified and should be dropped. In its

place we call on the Wales government urgently to bring forward plans for a sustainable, low- carbon alternative - a public transport based network which puts local people, businesses and our environment in South Wales at its heart. Everyone should have the ability to travel to school, college, work or retail centres using public transport. To achieve this we need integrated transport where trams and radically improved bus services link Newport, Cardiff and the valleys. We also need frequent electrified rail services, new and safer active routes for cyclists and walkers, and improvements to existing roads. The latter could be based on the Blue Route proposed by Professor Cole, or by considering the proposals put forward by CALM for a third tunnel at Brynglas. This integrated network would provide greater economic, transport, health and environmental benefits for SE Wales at a cost which will not starve the rest of Wales of urgently needed investment in our infrastructure, or set a ruinous precedent of reversion to outdated and ultimately counterproductive policies of building more and more congested roads.



22 April 2018

Dear Assembly Member,

We are contacting you once again about the M4 relief road. We hope that you will press for a more sustainable solution to the problem of congestion at peak hours on the M4 at Newport.

The Public Inquiry has examined the viability of the M4 scheme but it was beyond its remit to consider the best transport infrastructure for SE Wales – so it has assessed a scheme that was conceived in the early 1990s and has since become entrenched and supported by a powerful road-building lobby. For example, when looking at what buses could do to solve the problem, only a single east-west bus route in Newport was modelled – not a comprehensive bus network with frequent, affordable, high-quality services. Similarly with active travel, there was an assumption that this could make a negligible difference whilst in Edinburgh cycling has increased from 1% to 7% of journeys in recent years. Car-sharing, electric vehicles, autonomous vehicle, e-bikes, workplace parking levies, congestion charging, car sharing and tram/bus networks are among the components of sustainable transport systems – but they were not seriously explored at the Public Inquiry despite them proving highly effective across the UK and elsewhere.

The traffic modelling shows increases in traffic on the M4 recently. For some years, car trips in the UK have been falling and since 2016 have been stable. Yet traffic on the M4 at Newport has increased – probably because, aided by the Southern Distributor (which opened in 2004), Newport has become a very car-based city. The problem is one of *local*, not long-distance, traffic. The more road capacity is built, the more people will be encouraged to use cars and to use them more. Expenditure on the M4 will take money from other projects, including the metro, and will ensure cars remain the dominant mode of travel in south-east Wales for decades.

The proposed road will not solve congestion on the M4 – largely because it underestimates the level of induced traffic resulting from major road schemes. The CPRE published a report in 2017 which examined 80 road schemes and found that traffic had increased by up to 47% (over and above background traffic increases) over 20 years. The author of that report, Lynn Sloman, lives in Wales and we hope she might be able to address AMs on this critical issue.

The road is designed to be carbon neutral by 2078 (with a high construction carbon cost gradually repaid by marginal gains because of traffic flowing better on the new road). However, Wales and the UK have carbon targets which must be met by 2050. Transport is the main sector threatening the achievement of this target. Crucially, these longer-term carbon savings are premised on car emissions being as they are now – ignoring government policy to phase out sales of diesel and petrol cars by 2040. This means that there is certain to be a huge carbon cost but little or no eventual carbon saving. Instead, the budget for this huge roadbuilding project could



be invested more quickly into sustainable transport measures which would immediately start reducing the nation's carbon footprint.

The financial cost is huge and growing. At the latest official estimate it was over £1.3bn, and this is at 2015 prices and with no allowance for VAT, inflation or cost over-run. Many observers believe the final cost will exceed £2 billion. This makes it the most costly project ever commissioned by the Welsh Government, and it will use up capital budgets which could be used for infrastructure projects across Wales which could easily generate better Benefit-Cost Ratios.

Urban transport is changing, but the Inquiry heard little about what is emerging. Getting around in a machine that is 100 times the volume of a human body is no longer viable as the basis of a transport policy. Children in Wales walk to school less each year, largely because of the dangers of traffic; whilst we have a phenomenal growth of obesity due to lack of physical activity. There are growing concerns – and legal cases against the Government – about poor air quality, to which traffic is a major contributor. In short, is a car-based transport system the right thing to be building in Wales today?

In this letter, we have focused on the transport arguments which CALM sees as sufficient on their own to reject the Black Route. The permanent environmental damage which this Route would inflict on Newport's 'green lung' - the Gwent levels - is a further justification for rejection. The Gwent Levels are Wales' finest wetland landscape, meriting protection as a wetland of international importance under the Ramsar Convention. They should not be condemned to habitat loss, fragmentation and degradation. We have addressed this in an earlier communication to you. New material is also available this month on our website at <https://savethelevels.org.uk/>



The Gwent Levels Cranes: Garan with parents Lofty & Gibble

We would also ask if you could read our short closing statement to the Public Inquiry at <https://tinyurl.com/CALMclosing>

Transport debates and practices have moved on since the Black Route was conceived. CALM hopes that you will press for a more efficient and sustainable transport system for Wales.

Kind regards,

Rob Hepworth

Acting Chair, CALM



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