



- OUR CASE

March 2019

CAMPAIGN AGAINST THE LEVELS MOTORWAY

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*We have set out below what we believe to be an **overwhelming and objective case against the “Black Route” bypass**. We hope the Welsh Government and all its advisers will take what we say into account.*

CALM believes the M4 bypass across the Gwent levels is the wrong choice for Wales. Almost 19,000 people have signed our petition opposing this “Black Route”.

The Welsh Government and the public should reject the M4 proposals for at least SEVEN reasons :

- 1. They will cost too much - £2.5 billion**
 - 2. They will not solve congestion or other transport or economic issues in South Wales**
 - 3. They will cause irrevocable damage to wildlife & landscape in a unique protected area, the Gwent Levels**
 - 4. They contradict Government policies to reduce carbon emissions and combat climate change**
 - 5. They breach Wales’ own legislation, The Well-being of Future Generations (Wales) Act 2015.**
 - 6. They ignore the alternatives which are available to improve transport and access for all**
 - 7. They are opposed by two expert Government bodies, NRW and the Future Generations Commissioner**
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Cost

- Estimated in 2015 at **£800m** - the previous First Minister said the cost would be ‘nowhere near’ £1bn.
- **Increased to £1.32 billion by December 2017** according to official figures, partly because of large compensation to “buy off” objections from Newport Docks. On top of this are 4 yrs inflation; VAT; and cost overruns (the Heads of the Valleys road will cost 2¹/₂ times planned figure)
- For some time CALM has estimated that the eventual cost will exceed £2 billion. WG civil servants warned Ministers last year that **£2bn is now a minimum and the final price could rise to £2.5 billion**. In return for this colossal investment + several years ‘disruption from construction, peak M4 journey times around Newport would improve by an average of no more than **5 minutes**.

Transport and Economic Issues

- **Road building does not solve congestion** – it shifts the problem to adjacent parts of the network, where capacity is very limited. Authoritative 2017 research evaluating 80 recent new road schemes in UK showed that

they generate more traffic, leading to **permanent and significant environmental and landscape damage**, while showing **little evidence of economic benefit to local economies**.

- **None of the most congested UK cities and roads are in Wales.** There are far worse stretches than the M4 at Newport, including the M32 in Bristol, stretches of the M25 and North Circular. On the M4 in Newport there congestion is a peak-hour phenomenon. At most times of the day and night there is no problem. At no time do average peak-hour speeds fall below 21 mph and this is only west-bound east of the Brynglas tunnels in the evening. Claims of massive congestion are much exaggerated.
- The **Wales Federation of Small Businesses** has repeatedly opposed the bypass. In 2014 they said that it would be “a billion pound mistake. Earlier in 2018 in their evidence on the state of Welsh roads to the Welsh Assembly Economy & Infrastructure Committee , FSB said “ ***on the M4 relief road, FSB Wales’ objection has always been that it benefits a small area of Wales at relatively high cost, whilst effectively proscribing investment elsewhere in Wales***”.
- **Alternatives were not considered properly at the Public Inquiry** which was concerned only with the proposed M4 route, not the best way to fix the transport problems of the Newport area. See below.
- The **cross-party** Welsh Government Economy, Infrastructure and Skills Committee recommended in October 2018 that Wales should **give priority to maintaining the existing road network, and improving facilities for active travel, rather than building new roads.**

Wildlife and Landscape

- **14 miles of 6-lane motorway would plough through a Landscape of Outstanding Historic Interest and four Sites of Special Scientific Interest**, including the only site in Wales where the Common Crane has nested in the last 400 years.¹
- **The motorway would irreparably damage the Gwent Levels, one of the most precious and unique places in Wales.** Natural Resources Wales has said that this is not in accord with the Government’s statutory duties. At the Public Inquiry the world-renowned scientist Sir John Lawton set out the devastating impact the scheme would have on the whole ecology of the Levels²
- **The motorway would have adverse impacts on many other species**, including bats, otters, and the rare shrill carder bee. This is against the background of huge wildlife losses in Wales in recent years.
- Advocates of the road say they would put mitigation measures in place. But the evidence from the experts is that this will be ineffective. **We can’t recreate ecosystems overnight, it takes many, many years as evidence given to the Inquiry showed.**
- The new motorway would be on embankment for much of its length over the Levels ; **it would be widely visible with its noise and pollution magnified.** Quiet villages and residential areas around Newport will have their way of life disrupted, both after the road is finished and during its construction. The expensive new bridge across Newport Docks will be an enormous structure, visible from afar. Cyclists who now come to enjoy the quiet lanes of the Levels will have their enjoyment spoiled. Walkers and nature lovers who come to the area for exercise and peaceful recreation will also stay away. **Farming would be adversely affected. Tourist income would be lost. New urban development would be certain to locate near the new motorway as we have seen everywhere else. The Levels would never survive as an oasis for farming, wildlife and public recreation, and a green lung for Newport.**

¹ Please read more on these websites [Gwent Wildlife Trust](#) [RSPB](#) [CPRW \(Cranes\)](#) [Woodland Trust](#) and in separate briefing.

²<http://bailey.persona-pi.com/Public-Inquiries/M4-Newport/Third%20Parties/M4%20-%20Proofs/NRW/1.5.1%20-%20M4%20CaN%20-%20Proof%20of%20Evidence%20on%20Gwent%20Levels%20SSSIs.pdf>.

Carbon and Climate Change

- We know from the recent Intergovernmental Panel on Climate Change report that the world has at best only 11 years to act and prevent catastrophic climate change, putting all our futures in peril. Wales is already falling well behind on its carbon-reduction targets. The Black Route will make things significantly worse. ***Building the Black Route will result in additional emissions of 500,000+ tonnes of carbon dioxide equivalents which will not be removed from the atmosphere until at least 2072.***
- **The carbon arguments alone should disqualify the M4 Black Route from serious consideration.** Wales transport emissions must reduce by over 40% by 2030. Spending must focus on sustainable transport, not the Black Route.

Well-being of Future Generations (Wales) Act 2015 (WBFGA)

- **The M4 proposals conflict with the mandatory principles for determining policies in Wales on sustainability, transport and the environment under the WBFGA.** This has been stated several times by the Future Generations Commissioner for Wales, appointed by the Welsh Government. In her September 2018 report, [*Transport Fit For Future Generations*](#), the Commissioner Sophie Howe wrote :
- ***“ Wales has a choice to make. It must choose whether to spend £1.4 billion on building a 14-mile section of M4 motorway, or to invest in alternative sustainable transport infrastructure that's fit for future generations, that Wales and the world can be proud of... Our report highlights evidence around how building roads does not solve congestion and will result in Wales failing to decrease its carbon emissions ... The findings of this report clearly justify a reasonable cause for a review and re-appraisal of the Welsh Government's M4 Black Route proposal.”***

Cheaper and fairer alternatives are available

- In September 2018 the Future Generations Commissioner proposed a package of public and active transport measures costing £578m (a quarter of the likely cost of the Black Route). **These are based on a full Metro public transport system and new infrastructure for cyclists and walkers which will be cheaper, greener, healthier and fairer to the whole population and our entire environment in South Wales. CALM strongly supports these recommendations**
- Sophie Howe's proposals also meet the WBFGA statutory well-being goals, which include *a more equal Wales*. About a quarter of Welsh households do not own a car. A supporting study by the New Economics Foundation concluded that **an M4 bypass would significantly increase inequality in Wales**. Those with incomes in the top 20% would gain 3 times the benefits from an M4 bypass road than the poorest 20%. **Bristol and SW England would also get more benefits than Wales from a bypass** : the area north of Bristol would get 2% growth in access to jobs. Most areas in the Heads of the Valleys would see no improvement in job opportunities.
- The cost will also limit government expenditure across Wales for many years. **Borrowing has to be repaid by all Welsh taxpayers – with interest!**

Objections by Natural Resources Wales & the Future Generations Commissioner

- **2 Welsh Government-appointed, expert bodies object to the proposals for the Black Route.**
- As the Government's statutory environment adviser and agency, Natural Resources Wales have maintained several key objections to the Black Route. Notably, NRW lawyers said that the **Black Route would breach 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)".

- The Welsh 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 Welsh Government Ministers approve the scheme.

CALM's conclusion

- This is the largest single infrastructure investment ment in Wales since devolution. **The final decision needs to be made after proper examination of all the evidence, including recent reports from the Future Generations Commissioner),and in accordance with legislation.**
- Politically, the M4 decision is a **devolved** issue on which the Welsh Cabinet and Senedd have the final word. The decision does not belong to Westminster politicians.
- The M4 is a '**bypass to a bypass**'. When people need a second bypass operation for their heart, they would be wise to examine their lifestyle. Exactly the same applies to transport policy in Wales. CALM believes we need a healthier, fairer and climate-friendly transport options in Wales
- *We also take the opportunity to ask anyone who agrees with us to support CALM by adding their signature to the 18,900 names on our 38 Degrees petition against the motorway, which has also gone to the Welsh Assembly. We also thank the many residents in Newport and beyond who have already signed the petition. You can sign up at <https://you.38degrees.org.uk/petitions/stop-the-proposed-m4/>*

#NONEWM4