

Gwent Wildlife Trust Response to Welsh Government M4 Corridor Draft Plan Consultation Document – November 2013

Question 1

Gwent Wildlife Trust wishes to object to the Draft Plan incorporating the Black Route and complementary measures for the following reasons.

We believe the plan will cause irreversible gross damage to the Gwent Levels. The motorway would cut through 4 of the Gwent Levels SSSIs and the River Usk SAC. The proposal would destroy 5 miles of the SSSI under the footprint of the development. In addition, the remaining parts of the SSSI will be fragmented causing serious problems for animal and plant populations cut off and isolated by the motorway, reducing the gene pool and subsequently leading to dramatic population decline. There would be a considerable increase in background levels of pollution as well as the risk of larger pollution incidents, and mobile animal species such as the otter and water vole, already the UK's most threatened mammal, will be unable to make use of large areas due to the barrier the road will create.

The Gwent Levels is a very special area in Wales and is important for a number of reasons. The Gwent Levels is one of the largest surviving areas of ancient grazing marshes and reens (drainage ditch) systems in Britain. It is the largest area of its kind in Wales, of acknowledged UK-wide significance for its wildlife and archaeology. The proximity of the site to the internationally important Severn Estuary SAC and River Usk SAC add further value to this wetland complex. The Gwent Levels has also been registered as a Landscape of Outstanding Historic Interest.

The designation of the Gwent Levels SSSI is primarily as representatives of grazing marsh/reen habitat, with Magor Marsh having additional significance for its fen vegetation. In addition, the Levels also qualify as SSSI on the basis of their invertebrate assemblages, with significant plant species, otters, water voles and breeding birds also being additional qualifying features.

144 Nationally Notable or Red Data Book invertebrate species have been recorded from the Gwent Levels. The assemblages of water beetles and Odonata (dragonflies & damselflies) are both qualifying features of the SSSI designations. The Levels are also well-known for their particular importance for soldier-flies (Stratiomyidae), with further known interest from other fly and beetle groups, moths and snails.

The Levels support the Nationally Scarce rootless duckweed (*Wolffia arrhiza*). This is considered to be the world's smallest flowering plant. It occurs nowhere else in Wales.

Sites of Special Scientific Interest are the highest UK level designation a site can be given and they should be regarded as jewels in our landscape, to be protected and treasured. We consider these proposals to be seriously and irrevocably damaging to the SSSI and their assemblages of rare and threatened species.

The River Usk is designated as a SAC under European legislation. The main features of European importance are the river's migratory and resident fish species, including twaite and allis shad, sea, river and brook lamprey, Atlantic salmon and bullhead. Other species features of the SAC are the water crowfoot beds and the European otter which breeds along its banks and hunts for fish in the river and its tributaries.

The impact of a large bridge crossing of the river Usk Special Area of Conservation is likely to cause considerable damage and the potential impact has not been thoroughly assessed. This issue therefore needs addressing before any decision can be made.

We also wish to object to the draft plan as it contradicts a number of Welsh Government duty's policies and commitments such as:

- **Putting sustainability at the heart of their decision making processes**
- **Taking an ecosystem approach**
- **Halting the loss of biodiversity by 2020**
- **Tackling the causes of climate change and reducing greenhouse gas emissions by 3% per year in areas of devolved control such as transport.**

The Welsh Government has pledged it will put sustainable development at the core of Welsh Government. In our view the consultation should have offered sustainable public transport options as reasonable alternatives in the consultation in order to allow these to be considered fully alongside the motorway proposal.

The draft plan has not provided any calculation of the huge amount ecosystem services currently being provided by the Gwent Levels and has also therefore failed to evaluate the loss of those services as a result of the motorway proposal and the issues this will then create.

In response to the State of Nature Report the Minister Alun Davies stated "***The Welsh Government is committed to delivering the European Union biodiversity strategy commitment of halting and, where possible, reversing the decline of biodiversity by 2020.***" It is clear that the proposal will cause substantial damage to the SSSI and Usk SAC therefore resulting in considerable biodiversity losses, and will do nothing to reverse the decline.

Climate change in our view is the biggest mid to long term threat to biodiversity. Building new roads has been shown to cause 'generated traffic' additional journeys that would not have been made previously. The impact of building a new road is therefore likely to be an increase in the total amount of traffic and this would in all likelihood cause an increase in greenhouse gas emissions. We are therefore surprised that the consultation document does not make reference to the 2010 Climate Change Strategy for Wales or take into account the effect of generated traffic in its evaluation of greenhouse gas emissions.

Finally, we object to the Draft Plan because we do not believe the Welsh Government has adequately demonstrated in these documents the need for a major new motorway. We also

do not believe it has provided evidence that it is the most sustainable or economical way to achieve the additional capacity to reduce congestion. No proof has been provided that congestion on the M4 has hindered economic development, and no business case has been included which provides an independent assessment of the likely economic benefits of the motorway.

Without this evidence and information, we do not believe the consultation documents are complete. The public have therefore not been provided with sufficient information to judge the proposals. In addition, without this information, the Welsh Government cannot justify the gross damage proposed to the Gwent Levels.

Question 2 and 3 will have an amended version of Question 1 answer (as they are so similar)

Question 5 – Comments on the (SEA)

We object to the current **Strategic Environmental Assessment** document for the following reasons:

In line with European legislative requirements the SEA must identify “reasonable alternatives” to the new motorway, the preferred option of Government. We object to the fact that besides the ‘do minimum’ option the only alternatives presented are the Purple and Red Routes (which are very slight variations on the M4 Relief Road itself, all of which cut through the Gwent Levels of Sites of Special Scientific Interest). We object to the SEA because it fails to consider reasonable alternatives that avoid the very significant damage to the SSSIs, in spite of the existence of a number of alternatives which may be viewed as reasonable. An example of this is increased investment in rail services, rail infrastructure and park and ride facilities, in tandem with an upgrade of the A48 Southern Distributor Road and Llanwern steelworks road around Newport.

The SEA is further deficient because it attempts to downplay the adverse impacts on the environment from all of the alternatives set out in the draft Plan. The SEA does not provide any facts of figures about the losses of SSSI and simply states “*Despite the large scale of a new highway only a negligible length of reens would be affected when compared to the length of reens in the network*”. The SEA also downplays the impact of fragmentation on the species and habitats. Providing mitigation will not necessarily help those populations cut off from the larger population.

Gwent Wildlife Trust has noted there is a marked difference between the severity, scale and longevity of the impacts on biodiversity set out in the previous SEA Environmental Report (November 2012) and those set out in the current SEA Environmental Report. There is no explanation for this change.

The current documents also cause confusion for the reader, as the current SEA evaluates the potential damage to biodiversity as ‘-1 minor negative’ (orange) on table 16 page 56 and table 24 (Comparative Summary of Significant Effects) page 91. The current draft plan consultation document on the other hand evaluates the significance of the impact on biodiversity as ‘large adverse’ (red) on page 32. No attempt is made to provide a rationale for these differences.

We also wish to highlight that the Air quality assessment in the SEA is biased as it concludes that the impact of the Draft Plan on air quality would be significant and positive. This assessment appears to have been based solely on the effect on the old M4 route. No assessment has been provided to show the likely decline in air quality along the new proposed road, or the effects this may have on nearby residents or the ecosystem, plants and animals of the levels. This adverse effect appears to have been ignored.

Question 9 – Additional Comments

The Gwent Wildlife Trust wishes to object to the Draft Plan because it considers that the consultation processes to date have been heavily biased in favour of a pre-determined desired outcome – the M4 Relief Road and is therefore not fit for purpose.

The documentation includes many unfounded assertions, which are presented as if they were facts or as if they were so self-evidently true that any examination of the veracity is not required. An example of this is the following assertion in the Draft Plan Consultation Document:

“Congestion on the M4, particularly around Cardiff and Newport is sighted by the business community in South Wales as a barrier to economic growth”

This bold statement is not qualified by an examination as to whether all businesses in Wales subscribe to this view (they do not). In addition, this view is not supported by robust evidence or indeed whether, even were this to be the case, it of itself is sufficient justification for an M4 Relief Road. No attempt to obtain the equivalent collective view of the environmental community was made in the interest of balance and fairness.

We also wish to object to the fact that forecasts of increasing traffic volumes used to justify the need for a new motorway in the Draft Plan, 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 ‘road works 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.

In recent years a number of projects have been started which are likely to help reduce traffic congestion in South Wales and on the M4. The duelling of the A465 Heads of the Valleys road is nearing completion and once completed may have a significant impact on reducing traffic volumes on the M4. Rail electrification is another major project planned in South Wales, and this is known to cause a significant modal shift from road to rail. The introduction of variable speed limits on the existing M4 has improved the flow of traffic and reduced accident rates. These projects have not been fully described in the reports provided or their impact fully assessed in the rationale for the draft plan proposals. We believe their combined impact on M4 congestion may be considerable and the financial cost of a new motorway cannot be justified until such a time as the impact of these schemes has been determined.

In conclusion, we believe the draft Plan is inadequate and misleading. The draft plan has failed to provide a reasonable alternative other than the 'do minimum' option which does not damage the Gwent Levels. In addition, the transport needs of the public are currently changing and the plan has failed to understand and reflect the dramatic increase in the need for improved railways and public transport options. We therefore believe that the motorway across the Levels and its high financial and environmental cost cannot be justified. We believe the Welsh Government should instead be spending the money on upgrading the A48 Southern Distributor Road/Llanwern steelworks road and major improvements to the rail network and infrastructure, and other sustainable transport projects.