

M4 Relief Road – Public Inquiry, February 27, 2017

Submission from: Jenny Rathbone AM and Steve Howell

1 Summary

1.1 The central theme of this paper is that Wales should break with the car-centric policies of the past and adopt a multi-modal approach that looks at the transport needs of the nation as a whole in an integrated, objective way taking full account of the criteria in the Well-Being of Future Generations Act.

1.2 We believe a proper comparative evaluation of transport investment is all the more important given the tough choices Wales faces, due to current financial constraints and the legacy of chronic underinvestment in infrastructure.

1.3 Such an evaluation is absent from the approach taken to the M4 corridor around Newport. The different routes for a relief road have been evaluated in relation to each other without due consideration being given either to other solutions or to the impact of this investment on the wider region and Wales as a whole.

1.4 We believe this narrow consideration of the problem of congestion at the Brynglas tunnel has led to a deeply flawed proposal for the following reasons:

- Fails to tackle road congestion but simply transfers it to other locations
- Makes it harder to achieve health and climate change goals
- Reduces economic resilience and puts the success of the Central Cardiff Business Zone at risk
- Starves other projects that could reduce road congestion of capital
- Exacerbates social exclusion because more than a quarter of households in the region do not have access to a car
- Fails to meet Wales's well-being goals

In this paper, we explain the considerations that have led us to these conclusions.

2 Background and key considerations

2.1 The M4 relief road was conceived in early 1990s when car-centric transport policies were still the norm. Times have changed. Most city regions across the UK have invested heavily in integrated public transport, including light rail/tram systems, and it is widely accepted that road investment encourages people to use their cars more. Indeed, the Welsh Government's statement of its case acknowledges that a consequence of the relief road will be "some additional traffic in the road corridor" (2.3.3) and admits that it will produce a modal shift away from public transport to the car: "instances in which entirely new additional traffic arises from a switch from public transport or in terms of new trips arising from the change in travel costs on the road network" (2.3.4)¹.

¹ Welsh Government - M4 Corridor Around Newport, Statement of Case (quotes from and references to this document throughout our submission are given the relevant paragraph number).

2.2 It is concerning that this investment option is being promoted when it is known that per kilometre a rail line costs about the same as a motorway yet can carry 8-20 times as many people². In other words, we are being asked to invest heavily in a project that will further encourage car usage at the expense of other modes of travel which are more cost effective.

2.3 The problem of road congestion in South East Wales is primarily a product of the overwhelming reliance in the region on the car for commuting to work. On the M4 near Newport, the average daily traffic flow in 2015 increased nearly 40% from 87,785 vehicles east of Newport to 121,952³ to the west, suggesting that most of those joining the motorway at Newport are travelling to Cardiff and back. This is common ground between us and the Welsh Government (1.4.17). However, the problem of commuter-related congestion is not limited to the M4: within Cardiff, for example, there are numerous bottlenecks that delay commuters as severely as congestion at the Brynglas tunnel. For example, it often takes longer to get from Cardiff Bay to Cardiff Gate by car as it does to go from Caerleon to Cardiff Gate, even though it's only half the distance.

2.4 The economy of South East Wales is growing, but it is in danger of being held back by the inter-related problems of poor transport infrastructure and a skills shortage. After two decades of decline, Cardiff's population has increased by nearly a third in the last 25 years to reach an estimated 358,400. Over the same period, Newport has also grown (9% to 147,800), but the population of the adjacent Valleys boroughs (Torfaen, Blaenau Gwent, Caerphilly, Merthyr and Rhondda Cynon Taff) is either much the same or declining. These five areas are nevertheless home to around 650,000 people. That is nearly twice as many as Cardiff, where most of the growth is taking place (as evidenced by the ongoing construction of 2.64m square feet of office space in the Central Cardiff Enterprise Zone⁴). If the economic potential of the Cardiff Capital City Region is to be fulfilled, it must bring all its resources into play and make the questionable claim that 1.6 million people live within a 45-minute commute of Cardiff a reality. In our view, this can only be done by reducing our high-risk over-reliance on one mode of transport, especially for travel to work.

2.5 The M4 relief road public inquiry comes at a crucial point in Wales's transition to a low carbon economy. The Environment (Wales) Act places a duty on Welsh Ministers to ensure that in 2050 net emissions are at least 80% lower than the baseline set in legislation. This will be achieved through the setting of interim targets for 2020, 2030 and 2040 and 5-yearly carbon budgets up until to 2050. On 16 December 2016, the Welsh Government asked the Committee on Climate Change, an independent UK body set up to advise the UK Government and devolved administrations on carbon budgeting, to conduct a public consultation on what the targets should be. The committee is expected to make its final recommendations this October.

2.6 The Welsh Government's submission to the M4 inquiry says that the relief road would reduce carbon emissions by 1% "even though the number of vehicle trips would increase" (2.12.11)⁵. It says this is due to the route being 2.8km shorter and more efficient traffic flow. By its own admission, this reduction is "negligible" (2.15.31). We are concerned that this calculation fails to take account of the emissions of the admitted increase in traffic once it reaches other parts of the road system, such as when more car-bound commuters are stuck in the bottlenecks of Cardiff. We believe the relief road is likely to cause an increase in emissions at a time when a radical reduction is needed.

² Capital Traffic Management Limited – Submission to consultation on M4 Corridor around Newport, December 2013, p3.

³ Department for Transport, Traffic Counts, Newport.

⁴ Central Cardiff Enterprise Zone.

⁵ This statement is made on at least four occasions in the Welsh Government's Statement of Case.

2.7 The M4 relief road is an idea from an era in which Wales was governed entirely from London. Since 1999, Wales has pioneered some radical legislations that sets a very different framework for policy decisions. This not only includes the Environment (Wales) Act mentioned above, but also legislation such as the Active Travel (Wales) Act and the Well-Being of Future Generations (Wales) Act. The latter sets out seven well-being goals as part of its vision of a prosperous, healthier, socially cohesive, resilient, more equal and globally responsible Wales with a vibrant culture and thriving Welsh language. It then identifies five sustainable development principles (ways of working) that should be adhered to in making decisions, namely a requirement to take account of *long-term* needs and potential *preventative* action, to ensure *integration* and *collaboration* between public bodies to harmonise objectives, and to *involve* people with an interest in the goals in a way that reflects the diversity of the area served.

2.8 In a letter to Ken Skates (Cabinet Secretary for Economy and Infrastructure) on 8 June 2016, Sophie Howe (Future Generations Commissioner for Wales) said she was concerned “about the way the recent Sustainable Development Report (for the relief road) applies the Act in a retrospective fashion, almost to justify an existing decision, which I do not believe is in keeping with the provisions or intent of the Act.” We believe that, had the five principles been properly applied, it would have been clear that the relief road proposal does not meet the well-being goals.

2.9 The Well-Being of Future Generations Act’s objective of a more equal and cohesive Wales cannot be met by building a relief road as more than one in four households in the region do not have access to a car⁶. This will only be partially mitigated by the electrification of the core South Wales Valleys rail lines. The only way to allow people in households without a car access to Cardiff’s growth and encourage inward investment outside Cardiff is by developing a much more comprehensive public transport system across the region along the lines illustrated by the South Wales Metro map.

2.10 Most modern conurbations cater for a high proportion of commuting by public transport. These are predictable short journeys repeated by thousands of people every day. The more we see South Wales as one city region, the more emphasis we should place on it being connected in a multi-modal way. The Welsh Government argues throughout its submission that “studies have shown that new or improved public transport services would only have minimal impact in terms of reducing traffic on the M4” (1.4.22). This, in our view, depends on the scale and nature of the investment.

2.11 Wales’s public transport infrastructure is chronically outdated: rail rolling stock is antiquated and many bus and rail stations are still desolate, unattractive places. In city regions where substantial investment has taken place, public transport is increasingly popular. Passengers journeys on Manchester Metrolink, for example, grew 10% in 2015-16, taking them to 34.3million (more than quadruple the 1992-3 figure)⁷. Moreover, the “minimal impact” of public transport investment could be enough make a substantial difference to road congestion: a circa 5% *decrease* in M4 traffic around Newport in 2010 compared to 2008 (due to the economic downturn) led to an appreciable improvement in traffic flows⁸.

2.12 Financial constraints on the Welsh Government are severe and likely to get worse. The full Metro system as illustrated by the commonly used map is likely to cost £3 billion or more⁹, yet funding is secured for only £725 million (comprising £325 million for the core Valley Lines Electrification and £400 million pledged by the Welsh Government to the City Deal Investment

⁶ National Transport Plan – Consultation Draft p159.

⁷ Manchester Metrolink annual reports.

⁸ Department for Transport, Traffic Counts, Newport.

⁹ Estimate of Mark Barry, Professor of Practice in Connectivity, Cardiff University.

Fund)¹⁰. The relief road, meanwhile, will cost an estimated £1.093 billion and use the entire borrowing facility available from the UK Government. The Welsh Government argues that the Metro is “complementary to a motorway solution” (1.4.22). However, the reality is that roughly three-quarters of the funding for the Metro is not in place. If all the Welsh Government’s borrowing limit is spent on the M4, other funds for the Metro are unlikely to be forthcoming in the current climate, especially given the uncertainties around Brexit. We do not accept the “Wales can do both” argument and believe that what we need is a national transport plan based on financial realism and an objective assessment of all the investment options across Wales. The reality is that choices have to be made, and the Welsh Government’s claim that the benefits of the relief road “are expected to outweigh the costs by a ratio of almost three to one” (1.9.3) fails to take account of the opportunity cost of other schemes not going ahead.

3 Objections to proposed relief road

The considerations outlined above lead us to object to the M4 relief road proposal for the following reasons:

3.1 Fails to tackle road congestion - The relief road will produce the opposite of its intention: it simply moves the problem of congestion down the road and will almost certainly make it worse. The pull effect of a new motorway, and the growth in office space in Cardiff city centre, we believe is a recipe for gridlock on the roads into the capital.

3.2 Puts health and climate changes goals at risk - The claim that the relief road will reduce carbon emissions (albeit by a “negligible” 1%) is flawed because it fails to take account of the transfer of road congestion to other locations where stop-start traffic flows will increase emissions and worsen air quality. The proposal will make it harder for Wales to achieve whatever targets are set later this year under the Environment (Wales) Act.

3.3 Reduces economic resilience and adds risk - The relief road jeopardises economic development by increasing the region’s dependence on one mode of transport. It would drain resources from other transport projects, such as the Metro, that could help to bring more people into economic activity and increase the number of locations where inward and local investment is attractive. It could even put at risk the success of the Central Cardiff Enterprise Zone by making the take-up of office space unattractive as road gridlock for commuters into the city worsens.

3.4 Deprives better projects of capital - Spending the entire UK Government borrowing facility on one 14-mile stretch of road carries the opportunity cost of leaving other vital projects without funding or, as with the Metro, only partially funded. The claim that the benefits outweigh the costs by a ratio of three to one – even if true – is meaningless when there is no comparative analysis of the benefits of spending the same sum of money on, for example, a combination of the Metro, linked road improvements and active travel. With roughly 75% of the funding for the Metro not even identified yet, an opportunity cost of the relief road is a delay to investment, possibly for decades, in any new light rail routes to the east and north east of Cardiff.

3.5 Exacerbates social exclusion - The relief road will entrench the social exclusion of people for whom commuting by car is not an option and who do not have a viable public transport alternative. The claim that 1.6 million people live within a 45-minute commute of Cardiff¹¹ assumes car usage, yet more than 25% of households across the region do not have access to a car; others cannot

¹⁰ Cardiff Capital Region City Deal – par 14.

¹¹ Central Cardiff Enterprise Zone.

achieve that journey time by public transport. By spending all the borrowing facility on a stretch of motorway, the Welsh Government would be leaving thousands of people out in the cold whilst also depriving employers of access to their skills.

3.6 Fails to meet Wales's well-being goals - We cannot see how the proposal can possibly help to deliver the goals of the Well-Being of Future Generations (Wales) Act. In our view, it certainly cannot enhance health or make us more globally responsible (air quality/carbon emissions) nor is it likely to increase community cohesion or equality (social exclusion). We do not accept it will make Wales more prosperous than if the capital investment were spent in more productive ways. We believe any increase in our economic dependence on the M4 makes Wales less resilient and more vulnerable to problems associated with road congestion.

4 What is the alternative?

4.1 Considering projects on a standalone basis, as has happened with the M4 relief road, is not an effective way to deliver best value for Wales. We need a new approach to transport planning that applies consistent evaluation techniques to all projects, allowing them to be assessed objectively and compared with each other. This needs to incorporate a multi-modal approach in which all options are taken into account and viewed in an integrated way.

4.2 With this in mind, we cannot offer a fully-formed alternative strategy for tackling road congestion and improving connectivity across the Capital City Region because to do so would be to pre-judge an objective process. We do, however, think that the following ingredients should be considered:

- **Metro** – We fully support the concept of a frequent, ‘turn up and go’ public transport service with light and heavy rail and buses operating seamlessly across the region. The existing Metro map is illustrative and therefore should not preclude consideration of other options for the design of the system based on research into travel patterns, particularly commuting. Given the funding shortfall, even allowing for the redirection of some of the UK Government’s borrowing facility, decisions will have to be made on which portions of the system should take priority. If a primary aim is to reduce congestion on the M4 around Newport, a strong candidate for early attention would be the creation of a light rail link from Magor through Llanwern, Newport, Celtic Springs and St Mellons into Cardiff.
- **Car Sharing** – We believe more could be done to promote car sharing and to give priority to vehicles carrying two or more people as way of reducing congestion and carbon emissions. We should look at the experience of other city regions in promoting car sharing, including in the Bristol area where local authorities have funded Join My Journey schemes at Aztec West and the Temple Quarter Enterprise Zone and where the Avon ring road has a 2+ lane.
- **Road Investment** – We anticipate being accused of being against road investment per se, but this is not the case. We believe that road improvements and even some new roads will be needed in the region to improve connectivity. Completion of the Heads of the Valleys Road would divert long distance traffic away from the congested area of the M4. It is, as the Welsh Government says, “critical to the social and economic regeneration of the Head of the Valleys area”¹² while also providing better road access to Swansea and West Wales. The rail

¹² Welsh Government proposal to convert the A465 to two lanes in each direction between Dowlais Top and Hirwaun.

system that provides a framework for the Metro will itself need road and parking investment to ensure it is accessible, integrated with bus services and serves not only the larger towns and villages but also people in rural areas.

- **Active Travel** – The region has seen an increase in the number of people cycling, walking and running to work but we still lag well behind continental cities and even many in England and Scotland (such as Edinburgh, London, Bristol and Portsmouth). A tiny fraction of the budget for the relief road could deliver a step change in the infrastructure for active travel. (The proposed active travel measures in the Welsh Government’s new relief road proposal are minimal and aimed mainly at mitigating the negative impact of the motorway.)

About the authors

Jenny Rathbone is the Assembly Member for Cardiff Central. She represents a constituency that is severely impacted by traffic congestion. There are already two Air Quality Management Areas in her constituency, in Westgate Street in the city centre and on Newport Road near the Cardiff Royal Infirmary. She encounters the latter on a daily basis when travelling to the Senedd by bike or by car. Jenny is a member of the Climate Change, Environment and Rural Affairs Committee responsible for scrutinising Welsh Government on meeting Wales’ climate change emissions targets. She is also a member of the Communities, Equalities and Local Government Committee, which scrutinises the Government’s strategy for tackling poverty.

Steve Howell is chief executive of Freshwater UK, a communications consultancy employing 55 staff, two-thirds of whom are based at its head office at Cardiff Gate near Junction 30 of the M4. Steve founded the business in 1997 after leaving journalism. From 1993 to 2015, he lived in Newport and used the M4 as his route to work, firstly while based at BBC Wales in Llandaff (1994-97) and then when Freshwater moved to Cardiff Gate (2004-15). During 14 years of M4 commuting, he estimates he travelled via the Brynglas tunnel more than 5,000 times to and from work. He now lives in Cardiff Bay and finds the drive to Cardiff Gate usually takes longer, even though it is half the distance. Steve has consistently voiced concerns about transport issues as a regular business columnist for the Western Mail newspaper and as a board member of both the Cardiff Business Partnership (2013-16) and the parent body of the South Wales Chamber of Commerce/Centre for Business (2011-16).