

# Wentlooge Community Council

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Orders Branch - Transport  
Department of Economy and Infrastructure  
Welsh Government  
Crown Buildings  
Cathays Park  
Cardiff CF10 3NQ

Peterstone Village Hall  
Broadstreet Common  
Peterstone  
CF3 2TR

Reference: qA1174612

30<sup>th</sup> January 2017

**Dear Sir/Madam,**

M4 RELIEF ROAD - THE BLACK ROUTE

**Wentlooge Community Council (WCC) objects most vehemently to the proposed Black Route for the M4 Relief Road and requests that the Inspector recommends REFUSAL of Welsh Government's Draft Scheme and Draft Orders under the Highways Act 1980, the Acquisition of Land Act 1981 and other relevant Regulations.**

## **Summary**

WCC objects to all forms of inappropriate development within the Peterstone and St Brides' SSSI's and this proposal represents quite the largest and most significant potential negative impact of any development considered thus far.

WCC seeks to protect these ancient and iconic wetland areas of local, national and international significance and ironically now finds itself at diametrical odds with both Newport City Council (NCC) and Welsh Government (WG) who are primarily charged with their very protection under statute.

St Brides is an area of immense and exceptional cultural and historic significance, a SSSI, SLA and Cadw/ICOMOS UK Registered Landscape of Outstanding Historic Significance, an internationally important RAMSAR site and a gateway to the new Wales Coastal Path. (NCC -LDP Policies SP5 and 8iii).

## **Physical Harm to the Environment**

The potential harm to the historic landscape and wildlife is incalculable and whilst WG have previously addressed objections and issues raised by providing individual 'statements of mitigation' WG appears not to disagree that considerable and irreversible damage will occur, and that the carbon footprint involved in the road's construction will be vast - 100's of hectares of land will be covered in concrete and tarmac 'structures overshadowing the landscape' below. The embankment at Berryhill Farm for example will be 18m high and approximately 120 metres wide at ground level supporting a 40 metre wide roadway with drainage ditches.

It is not without good reason that NRW and leading environmental organisations including the Wildlife Trust Wales, CPRW, RSPB Wales, Friends of the Earth, the Woodland Trust and Sustrans etc have all objected to these proposals.

WCC would refer the Inspector to these detailed objections<sup>1</sup> and would respectfully concur.

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1. OBJ0029, OBJ0030, OBJ0033, OBJ0069, OBJ0088, OBJ0106, OBJ0125, OBJ0125-A, OBJ0144, OBJ0243, OBJ0245, OBJ0245-A, OBJ0260, OBJ0267, OBJ0268, OBJ0270, OBJ0271, OBJ0297, OBJ0298.

## **On-going Harm to the Environment**

The loss of habitat combined with the landscape and visual impact on the Gwent Levels and its surroundings will be on an unprecedented scale and irreversible.

In particular the vehicular noise and pollution from fumes will be enormous particularly for the St Brides coastal area, Lighthouse Park and Dyffryn areas. The population of Dyffryn/Tredegar Park area alone is currently 4,496 (Source: NCC's Community Well-being Profile December 2016) and rising, to which should be added additional students to St Joseph's RC and John Frost schools together with the new Welsh school and Dyffryn Infant and Junior schools).

Traffic travelling at motorway speeds on the elevated section across the moors some 22 feet in the air without (it seems from the promotional video) any attenuating/mitigating barriers will create an avalanche of noise and fumes that will affect Dyffryn and Grade I Listed Tredegar House on prevalent south-westerly winds but equally during relative calm/obverse wind conditions, be spread far and wide across Peterstone and St Brides' SSSI's, farmland generally and residential areas.

WCC is also concerned that contaminated surface water will discharge into treatment areas which it is hoped will attenuate/treat this water to be subsequently discharged into existing watercourses.

This on-going damage will occur for years, and will be both extreme and potentially irreversible for mammal and invertebrate populations. Needless to say, the human population - the people who live here too - will also suffer.

## **A Solution to Congestion ?**

The Institute of Directors, CBI Wales etc all claim that a faster less congested M4 into Wales will boost the economy. WCC does not disagree with this contention, however it does question the means of obtaining this 'upgrade'.

Firstly, all the evidence WCC has seen appears to contradict the argument that building another road solves this type of problem. The example of the M6 Expressway built in 2004 (although a toll road and therefore costly to use) points to most users of the M6 beginning and ending their journeys within the Midlands conurbation so that the 'new' road has done little to relieve congestion - is the same true of Newport ? - WCC believes it is.

Secondly, to control noise and pollution new roads are best located in cuttings rather than at ground level or slightly above, and certainly not elevated on 10 metre high embankments and stilts.

WCC considers that there are a variety of potential alternatives that need to be investigated much more extensively which would 'move' this potential source of environmental pollution further away (this is not simply Nimbyism, but common sense given the sensitive nature of this historic landscape).

Of course WCC would prefer that no new motorway/relief road is built at all, but if one is to be constructed then it should preferably be located as far away from the Wentlooge, and other Levels, as possible. Therefore in a descending order acceptability WCC suggests:-

(a) WG develops a sustainable transport strategy to reduce reliance on motor vehicles for the transport of goods and people. Options should include the construction of complex and sophisticated metro systems, trains, tram and bus networks which are less noisy and less polluting. For example rail freight produces 76% less CO2 emissions than the equivalent HGV journey, each freight train removes 43-76 lorries from the roads and far less people are impacted by rail noise than those impacted by road noise (Source: DfT Rail Freight Strategy September 2016). Yet road transport is one of the fastest growing sources of climate change as still more and longer HGVs take to the roads (c.f. UK Govt's road

trial which started in 2012 of 1800 no. x 18.55m long vehicles - as opposed to the normal 16.5m - has just been increased to 2800 no. for a further 10 years).

Too many heavy goods are currently carried on our roads and too many individual journeys made although this contention will clearly be objected to by the road transport lobby and haulage industry.

(b) Utilise the existing M4 upgraded vis à vis hard shoulders, curves, gradients etc and cut off access to/from local traffic;

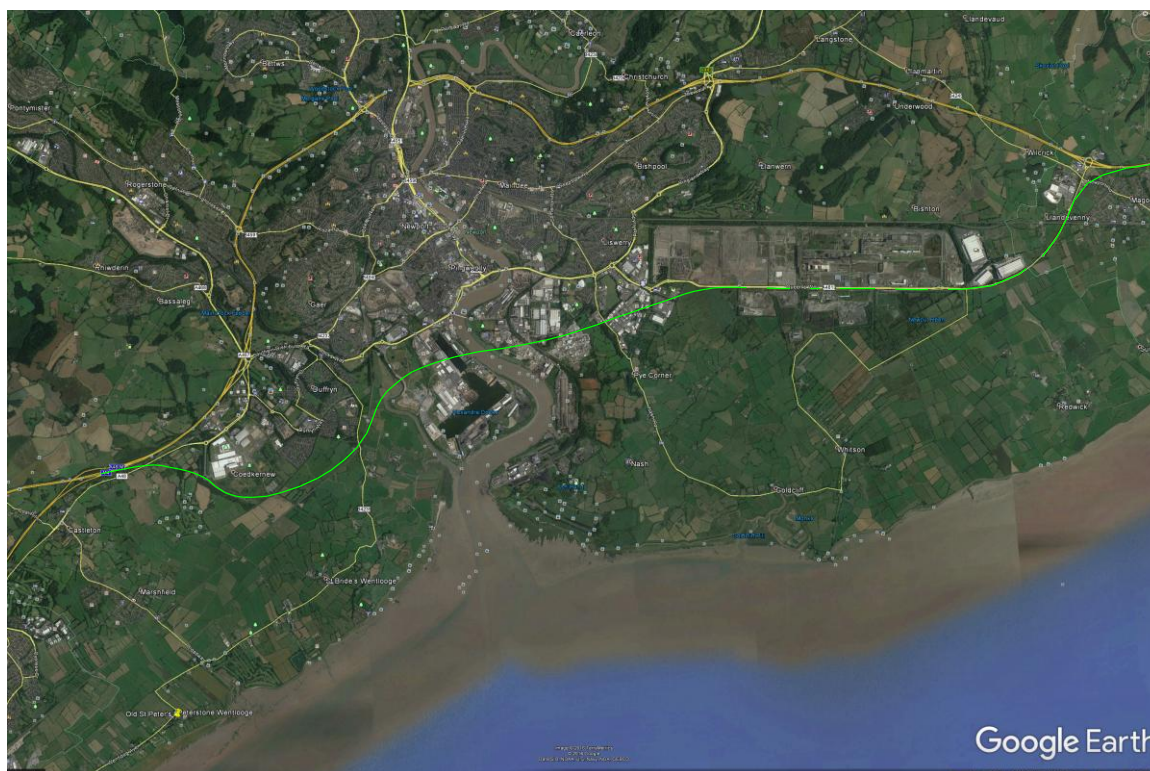
WCC members' experience of the M4's current route is that it is perfectly adequate but that there are too many junctions allowing the M4 to be used as a 'rat-run' for local Newport traffic. The suggestion being that only J24 Newport East and J28 Newport West should remain - Cardiff - Wales' Capital has only three junctions.

Complimentary 'resilience' measures should also be investigated in more detail to improve local road network capacity (i.e. the SDR and so called 'Blue' route currently used as a short cut from Tredegar J28 to Magor Services J23A avoiding the Brynglas tunnels at rush hours).

(c) A new tunnel type solution c.f. the 2nd Dartford tunnel proposal, Paris underpasses etc - although this strategy would be more costly.

(d) An adapted version of the 'Blue' route proposal currently used as a short cut from Tredegar J28 to Magor Services J23A. Or, a possible Green route as indicated below, or

(e) More northerly variants of the 'Red' or 'Purple' routes that would all lessen the impact on the SSSI.



WCC are also concerned that any relief road should provide a 'corridor of movement' rather than a 'corridor for development'. There appears to be future inherent dangers (i.e. opportunities for development) in the location of the 'Black' route especially at its eastern end south of Llanwrn Steelworks and also between the proposed Church Lane over bridge and the Intercity railway line south of the former LG site.

## **The Cost/Economy of Wales**

The current cost estimate of £1,093m excluding VAT and inflation for 23km (SAR 2016) of motorway appears highly optimistic and is likely to be nearer £1,500m (or even £2,000m). The mostly elevated M74 extension in Glasgow cost £86,500/metre (in 2011) nearly twice the £47,520/metre quoted for the 'Black' route (Q4/2015).

It is also unclear whether ground conditions have been fully investigated/taken into account especially for the high level section from the Dyffryn Railway Bridge to the Ebbw River crossing. Network Rail's electrification works/replacement of Hawse Lane bridge have been considerably prolonged and over budget owing to underestimating the extent/time to pile poor ground bearing conditions (estuarine alluvial silts/clays).

This together with inevitable increases in other construction costs and higher than forecast land prices/compensation to landowners are all likely to contribute to over spend and this higher cost (PVC) will seriously undermine the economic benefit ratio (BCR) derived.

That being the case, the question to be asked is whether that level of funding can be supported and/or spent on better alternatives ? Indeed, the enormous costs involved will leave little funding left for any other projects for the rest of Wales.

## **Conclusion**

**For all the above reasons Wentlooge Community Council recommends that the Inspector refuses Welsh Government's Draft Scheme and Orders at the present time.**