**Peterston-super-Ely Community Council**

**Cyngor Cymuned a Llanbedr-yr-Fro**

**WelTAG Stage Two Plus Consultation Response:
Proposed road linking the M4 at Junction 34 to the A48**

**Dec. 20th 2020**

**Summary:**

1. This is the response of Peterston-super-Ely Community Council (PSE CC) to the WelTAG Stage Two Plus consultation document for a proposed new road from the M4 at Junction 34 to the A48 at Sycamore Cross. Our response has been informed by the views of residents collected in our own consultation process.
2. PSE CC objects to the proposed road options A, B, C1 and C2 and supports the ‘do minimum’ option maintaining the existing road.
3. PSE CC also objects to the following aspects of the WelTAG consultation and documentation:
* The strategic case made for the major road options is seriously flawed and has not followed proper WelTAG procedure. A proper assessment of integrated transport options has not been carried out, calling into question the credibility of the Outline Business Case as a whole.
* The considerations in the WelTAG process do not conform to a range of Welsh Government legislation on well-being, integrated transport, sustainability, carbon emissions reduction and environmental protection.
* Engagement of residents and civic society stakeholders has been limited and inadequate, failing to include a range of valid expertise in the process.
* The impact assessment is inadequate and biased toward justifying building a road.
1. For the reasons above, we believe that the process to date does not meet the requirements set out in the WelTAG Appraisal Guidance (2017) and that the current process should be rejected and a new assessment and options appraisal for integrated transport in the wider area undertaken.

**The Strategic Case**

1. The strategic case for the proposed road is inadequate; Stages 1 and 2 are not in line with the WelTAG Guidance to consider a wide range of solutions within the transport sector. The strategic problem relates to congestion and journey times in a wider area than just the Pendoylan corridor. WelTAG has failed to make any serious appraisal of integrated transport options to reduce traffic congestion such as integrated public transport, reduced or zero bus fares, enhancing the active travel network, reducing single car occupancy by car sharing, workplace parking levies, road pricing or congestion charging, travel reduction measures, etc. – let alone a comprehensive package of a combination of these. Non-road alternatives were neither considered nor modelled, as is required by WelTAG.
2. In failing to consider the importance of modes other than the car and in its narrow examination of one motorway junction, Stages 1 and 2 are also failing to meet the requirements of the Well Being of Future Generation Act in relation to finding the most sustainable solution to the challenges posed.
3. Stages 1 and 2 are also in direct conflict with the declaration of a Climate Emergency made by the Welsh Government and the Vale of Glamorgan Council in 2019. The declaration seeks to significantly reduce carbon emissions as a priority within public sector decision making. This WelTAG process has not factored this in. It has not examined the low carbon options as alternatives to a road based solution.
4. The strategic case is also outdated. The consultation document acknowledges that it does not consider at all the implications of Covid-19 and likely changes in home working and reduced air travel. It does not address sufficiently the imperative to reduce greenhouse gas emissions and road traffic. Many studies confirm that new roads just result in increased traffic and higher emissions. And it does not consider the effect on regional traffic of the rail Metro developments and the proposed rail parkway at J34.
5. The strategic case utilises conventional models and calculations about road building need and impact. These are seriously flawed and in need of reform concluded a study commissioned by the Council for Protection of Rural England of outcomes of road building over 20 years. The study evidenced new roads over the longer term caused:
* induced traffic, often far above background trends;
* significant environmental and landscape damage;
* widespread damage to biodiversity;
* worse than expected greenhouse gas emissions;
* increased car-dependence;
* and show little evidence of benefit to local economies
1. There is no need for this road. Trunk road routes already exist to the airport and enterprise zone: J33 A4232/A48/A4226; and J35 A473/A48/A4226. Time saving on the short length of 6 km of proposed road can only be a few minutes making little difference to accessibility considerations.

**Non-comformity with legislation**

1. From the outset of the process, consideration of all possible transport solutions has been marginalised, or invoked only to support the road-building objective:
* Welsh Government’s ‘National Transport Finance Plan’, December 2017, refers to this road scheme, with the purpose of the WelTAG study being to determine the preferred option, i.e. which route the road should take. The consultation has largely and quite explicitly focused on which route for the road would be chosen.
* The Stage 2 report states that options were justified based on the Peter Brett Associates Report, the ‘Case for Change’. However, this was published in February 2018 - after the conclusions of the WelTAG Stage 1 Report and after the shortlisted options were agreed by the Vale of Glamorgan Council Cabinet in November 2017. This clearly shows that the decision on the option for Junction 34 was taken first - based on very little evidence and with no exploration of alternative options - and the strategic justification came retrospectivelyto back this up. The conclusion that M4/A48 options best address the regions issues and challenges is therefore fundamentally flawed and misleading.
1. The WelTAG process requires an independent review of the process and conclusions to date at the end of Stage 2 and before Stage 3. There is no mention of this independent review or arrangements for it to happen.
2. The Well-being of Future Generations (Wales) Act (WBFG) is cited and summarised in the documentation, but then largely ignored – for example regarding the long term; integration (e.g. with the climate emergency); involving a diversity of the population in decisions that affect them; and working collaboratively to develop sustainable solutions. The practice of WelTAG with this scheme has been rather different, even though it is essential to comply with the WBFG Act when using WelTAG. The Future Generations Commissioner for Wales in a letter (25th Nov. 2020*)* to the Minister for Economy and Transport has highlighted her concerns about poor WelTAG process for this scheme so undermining the Welsh Government’s progressive approach.
3. The objectives of the scheme are only loosely related to the seven goals of WBFG. There is no sense that the WBFG goals were used as a framework for the development of the scheme, rather an old-fashioned road scheme has retrospectively been fitted into them. The scheme has five objectives which fail to adhere to the principles of WBFG, and even so the scheme will largely fail to achieve its own limited objectives.
4. The first objective is to ‘enhance connectivity to Cardiff airport and strategic employment sites in the region’. Success of this is to be measured, however, by looking at something very different, ‘reduced and more reliable journey times between [the] strategic [road] network and Cardiff airport and St Athan’. So the transport issue is defined solely in terms of road use.
5. Objective 2 is to ‘increase transport options for strategic access and access to and from local communities’. This is to be measured by looking for ‘increased use of sustainable travel modes by residents and local communities’. There is no prospect of a road-building scheme achieving increased use of sustainable travel modes.
6. The third objective is to increase resilience and safety on the M4, the A48, the A4232 and other roads. This will be measured by reduced accidents and delays. But many decades of road-building show us that, almost always, building roads encourages traffic, by making driving a relatively better option, which in turn increases pressure on the network (commonly on adjacent but different roads). Building roads does not fix jams, or network resilience, except in the very short term. Moreover, ‘reduced accidents’ will be measured not by fewer accidents, but by accident rates per vehicle kilometre - so a lot more vehicles and just a few more accidents would be a success.
7. The other two objectives are to protect and enhance the built and natural environment; and to support communities, social inclusion, health and well-being. Success for these two objectives is to be measured by an improved transport network with at least no reduction in all of these things – which, given the noise, pollution and destruction of habitats and amenity acknowledged in the impact assessment, will not be achieved.
8. Other issues were not considered that are required by the WBFG Act. These include transport poverty, and how the proposal contributes to reducing inequality. 20% of residents of the Vale of Glamorgan have no access to a car, these are predominantly poor and elderly, and they will experience no benefits from this scheme. It is unclear how the scheme is reducing inequality, given that it advantages the relatively advantaged. The impact of traffic on mental health and well-being is well documented but not mentioned.
9. Wales Transport Strategy ‘Connecting the Nation’ has key areas including:
- reducing greenhouse gases and environmental impacts;
- improving public transport and better integration between modes;
- improving links and access between key settlements and sites (but with no specific mention of roads in this).
The WelTAG process for the Pendoylan road has failed to act on these priorities by considering sustainable transport options.

PSE CC argues that the strategic case is fundamentally incorrect and out of date and conflicts with a range of Welsh Government legislation, and that the current process should be abandoned. In this light the following responses are moot but nevertheless we believe it is important to state the shortcomings of the process and the latest consultation documents.

**(Non) Engagement of residents and civic society stakeholders**

1. The Review Group for the scheme met only once and largely consisted of local authority officers who supported building a new road. Not all the local representatives received the documentation for the meeting in time. The one Review Group meeting was not welcoming to opinions challenging the case for the road and did not respond adequately to them, so local views and knowledge were ignored.
2. Contrary to the requirements of WelTAG there has been no involvement of cyclists or cycling bodies, nor of horse riders and their organisations, in the WelTAG process. The summary of stakeholders (Outline Business Case 2.6.1) lists no-one with expertise in active travel. Environmental and other stakeholder organisations have not been involved in the consultation nor the Review Group despite their undoubted expertise in the areas of impact of the scheme. The Woodland Trust was seen as not an appropriate body to be a member of the Review Group because it is ‘a lobbying group rather than a technical consultee’ even though impact on ancient woodland is assessed as seriously adverse.
3. A report was produced analysing the responses to the WelTAG Stage 2 consultation, but there have been no responses to points made and errors identified by consultees, which is not usual practice.

**Impact Assessment**

1. The claim that the proposals will relieve congestion on the strategic network is fundamentally flawed and misleading.The Brett ‘Case for Change’ Report states that the role of road will be to improve access from the M4 to Cardiff Airport and the Enterprise Zone at St Athan and forecasts that 10,000 travellers will use the route daily. However, it does not state what proportion of these would be going onto the Airport/St Athan and what proportion would be going onto towards Culverhouse Cross and Cardiff. With only limited flights available from Cardiff Airport compared to other regional airports, and (pre-Covid) just 1.4 million passengers per year (around the same amount as Bridgend Train Station) evidence would suggest that most of the 10,000 travellers would be road based commuter and freight traffic destined for Cardiff. No attempt has been made to determine this important split despite it being suggested at consultation meetings that it could be done using vehicle licence recognition.
Culverhouse Cross experiences very high levels of congestion and air pollution already. Traffic on the A48 towards Cardiff currently backs up past Bonvilston on most mornings during peak times. The WelTAG Stage 2 report states that the morning peak will bring an additional 2,000+ vehicles onto this part of the network. Additional traffic accessing the A48 from the M4 will only exacerbate this problem.
2. Measures of success for the objectives that the proposed road should meet are weak. For example: “Minimise impacts on communities and support social inclusion and health and well-being” (Outline Business case, 2.7.1) has success measures as “Number of properties affected, length of walking and cycling links provide.” These measures are so weak as to be irrelevant.
3. Impact assessment is too narrowly focused on effects in the immediate vicinity of the road. Noise and visual intrusion will affect communities across the Ely valley not just homes near the road and in Pendoylan.
***The impact assessment should be revised with a wider analysis of impact on surrounding communities****.*
4. Assertions about impact assessmentin the Outline Business Case are referred for evidence to the Impact Assessment document. In reality most of the assessments have no evidence but are subjective judgements; some others have technical, numeric content but methodology for these has been shown to be often inaccurate (CPRE study). The numeric assessments are given more weight than subjective and qualitative ones, disregarding many major adverse assessments eg. ecological, biodiversity and ancient woodland impacts.
***Non-monetised impacts should be given greater weight in overall assessment of impact and value for money, based on an evaluation of ecosystem services****.*

Social impacts:

1. The assessments state public transport improvement for local people as a benefit of the road. This would simply not be the case. The road does not service local centres; there would be no bus stops along the route. There would be little/no public transport benefit to local people.
2. The assessments state improved access to the strategic road network by local people as a key benefit of the proposed new road. This would simply not be the case. Access to the strategic road network by local people would be worse because of significantly more traffic (10,000 travellers/day) in the area, increasing waiting times at key junctions, making journey times for local people significantly longer.
3. The impact assessment for cycling is wrong and conflicts with the Active Travel Act. The assessment only looks at cycling in terms of journeys to work and services, but seems unaware of the major leisure activity of cycling in the Ely valley which would be adversely affected by the proposed road – in particular the closing of Trehedyn Lane and Clawdd Coch junction. This is also a concern for horse riders.
Existing roads are already well accessed by many cyclists who enjoy the area for leisure purposes. A major commuter route would detract from the safety and accessibility of this route for leisure purposes. The proposed road would not provide any additional benefits to those who make journeys to work on bicycle.
4. The assessment suggests one of the biggest positive social impacts would be on security. This is frankly ridiculous. Quite how the introduction of a new road with 10,000 travellers per day in an area of low population and low crime can be assessed as improving security makes a mockery of the whole process.
5. The assessment scores the impact on journey quality as ‘large beneficial’ as drivers will enjoy the surrounding scenery. It is ridiculous that this is even a factor in the consideration of such a large infrastructure project with serious adverse impacts.

Environmental Impacts

1. The impact assessment considers that the introduction of 10,000 travellers to the proposed road would have only a ‘minor adverse’ impact on noise within the Appraisal Area, despite the admission that quantitative data is not yet available. The truth is that the exact noise impact is unknown, but it is certain that it will be more significant than ‘minor adverse’ through the introduction of significant levels of traffic to a quiet rural area.
2. Air quality is assessed as having a ‘minor adverse’ impact. The second paragraph states that *‘implementation of a new highway network has the potential to improve local air quality through Pendoylan village with a reduction in local traffic flows forecast and the potential for existing car trip to diverted to public transport’*. Firstly, the addition of 10,000 travellers/day is not a reduction and 2) there are no public transport benefits. The next paragraph states *‘A new proposed alignment is forecast to significantly increase travel flows through the Pendoylan corridor with the potential to establish adverse air quality in the vicinity of the new link’.* Confused and unprofessional.
3. The assessment of landscape impact concludes that the proposed road will have significant impacts on landscape in the narrative, yet only scores the impact as ‘moderate adverse’. Similarly for bio-diversity and the water environment. These should all be scored as ‘large adverse’. They are likely to be damaged significantly and irreversibly.
4. The impact on residential amenity is scored as ‘minor adverse’. This is because the new road is supposedly reducing traffic flows within the area. Again this is so misleading. The road will significantly increase traffic flows and contribute to climate impacts. A major road with 10,000 travellers/day, elevated in places, will have a large impact on residential amenity and should be scored as ‘major adverse’.

Economic

1. The economic appraisal is crude and inaccurate. Appraisal for time and vehicle savings does not even fully utilise the standard methodology and acknowledges: “This methodology is likely to overestimate the benefits but has been taken forward in the absence of a more robust alternative.” (Economic Appraisal, 2.2.6). Similarly accident cost savings are based on a theoretical reduction of accidents on other roads in the region as a result of the new road – projected over 60 years. There have been 3 accidents on the Pendoylan Rd. in 4 years, 1 serious, but the guesstimated accident saving is £16.6m.
***More robust methodology should be used or the large uncertainties in these calculations acknowledged prominently****.*
2. Wider economic impacts seem tenuous at best. Narrative says the new link road ‘may’ include induced investment; ‘may’ benefit larger commercial businesses; ‘may’ benefit labour supply. There are too many uncertainties within this assessment and no firm evidence provided. Given this is regarded as the whole rationale for the road, this is simply not robust enough to justify the level of investment and other significant social, cultural and environmental costs that the Junction 34/A48 would result in.

**Comments on proposed route options**

1. Proposals A and B will create a major ‘rat-run’ through St. Brides and Peterston super Ely for traffic from west Cardiff, and the major housing developments there, going to the M4, and for traffic from the west into Cardiff - increasing noise, disruption and emissions in these communities and posing safety concerns. This would also create significant congestion on the unimproved Logwood road likely to spill over on to a new road and Sycamore Cross junction.
2. Proposals A and B: The proposed closures at Trehedyn Lane and Clawdd Coch will channel more traffic onto the Logwood road amplifying problems there. The closures will also inconvenience residents of the area by cutting direct connections between settlements to the north of the A48.
3. The consultants carrying out the Stage 2 consultations lack local knowledge and have made little effort to familiarise themselves. Neither have they tried to utilise local knowledge. As a result a number of mistakes or omissions have been made in the process. For example the current consultation documents do not identify nor consider the new housing development at Bonvilston and its access on to what would be a major road with heavy traffic with proposals A and B.
4. Proposals C1 and C2:
* Will inevitably attract more traffic passing through Pendoylan and Clawdd Coch with very significant adverse effects. A suggestion is made in the consultation documentation that HGV vehicles could be restricted on C1/C2 road proposals *–* ***this suggestion should be applied to the existing road.***
* Will create a 30mph limit road (and from 2023 a section of 20mph limit road through Pendoylan) where currently there is a road with 60mph speed limit along most of its length, albeit that traffic is slowed by the narrowness of the road. It is questionable whether any time savings would apply in practice in these options.