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# M4 Corridor around Newport

We want your views on our draft Plan which aims to address transport related problems on the M4 around Newport



Llywodraeth Cymru  
Welsh Government

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**M4 Corridor  
around Newport  
draft Plan**

**Consultation  
Document**

## Equality Impact Assessment

Date of issue: 23 September 2013  
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Large print versions of this document are made available on request. Please contact Allan Pitt via:

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## Glossary

The following terms are referred to in this Equality Impact Assessment (EqIA) Consultation Document:

AQMAs	Air Quality Management Areas. Since 1997 local authorities in the UK have been carrying out a review and assessment of air quality in their area. The aim of the review is to assist authorities in carrying out their statutory duty to work towards meeting the national air quality objectives. If a local authority finds any places where the objectives are not likely to be achieved, it must declare an Air Quality Management Area there.
DfT	Department for Transport. It works to support the UK transport network and plans and invests in transport infrastructure.
Do Minimum	This is a scenario (sequence of future events) where intervention includes doing nothing above what is already planned or committed. In this case, it includes all recent network modifications (such as the Junction 24 improvement and the Variable Speed Limit system) and any committed schemes (such as the Junction 28/Bassaleg Roundabout/Pont Ebbw Roundabout improvement and the Steelworks Access Road)
Draft Plan	This is the Welsh Government's preferred strategy to solve transport related problems affecting the M4 Corridor around Newport in South Wales. If implemented, the draft Plan would lead to a new motorway (Black Route) being built to the south of Newport, alongside some complementary highway management, walking and cycling initiatives. Assessments of the draft Plan compare it to reasonable alternatives, as well as the Do Minimum scenario.
EqIA	Equality Impact Assessment. A way of examining and analysing services, policies and strategies that identify existing and potential impacts on certain groups of people, and sometimes individuals.
LGB	Lesbian, gay and bisexual
M4 CEM	M4 Corridor Enhancement Measures. A Welsh Government initiative set up to explore and resolve issues of capacity, safety and resilience along the M4 corridor in South East Wales.

NAPPAs	Noise Action Planning Priority Areas. Noise maps and associated plans are managed by the Welsh Government and local authorities to find where noise levels are high and help create noise action plans to address the issue.
Reasonable Alternatives	These are reasonable alternatives to the draft Plan, being other options that the Welsh Government consider could solve transport related problems affecting the M4 Corridor around Newport in South Wales. If implemented, the reasonable alternatives would lead to either a new dual carriageway (Red Route) being built to the south of Newport, or a motorway solution along a similar alignment (Purple Route) alongside some complementary highway management, walking and cycling initiatives.
SAC	Special Area of Conservation. Strictly protected sites with listed habitat types and species that are considered to be most in need of conservation at a European level (excluding birds).
Scheme / Project	For individual schemes or projects, the appropriate level of appraisal is more detailed, quantitative and evidence-based <sup>1</sup>
SEA	Strategic Environmental Assessment. A process that provides for the high level protection of the environment, by ensuring the integration of environmental considerations into the preparation of plans and programmes and to contribute to the promotion of sustainable development and environmental protection.
SDR	Southern Distributor Road. In this case, the A48 Southern Distributor Road, Newport.
Strategy, Plan or Programme	A strategy, plan or programme sets out broad objectives, identifies measures to achieve these and proposes a typically broad package of interventions to achieve the objectives. The appropriate level of appraisal is also broad, and at a strategy level, it may only be possible to undertake appraisal qualitatively <sup>1</sup> .
SWATS	South Wales Area Traffic Survey
TEN-T	Trans-European Transport Network
TPOs	Transport Planning Objectives
TR111	Once a preferred route of a transport scheme is announced, the Welsh Government serves a statutory TR111 notice on the local planning authorities requiring the line to be protected from development
UNCRC	United Nations Convention on the Rights of the Child
WelTAG	Welsh Transport Planning and Appraisal Guidance is a transport appraisal tool applicable to transport projects, plans and programmes in Wales. The Welsh Government requires that major transport initiatives seeking government funding are appraised with this guidance.

<sup>1</sup> Source: Welsh Transport Planning and Appraisal Guidance (WelTAG), June 2008

# 1 Introduction

Please read this document alongside the overarching M4 Corridor around Newport draft Plan Consultation Document<sup>2</sup>.

The draft Plan has been developed taking into account the extensive work undertaken as part of the M4 Corridor Enhancement Measures (CEM) Programme. The M4 CEM Programme was set up to explore and resolve issues of capacity, safety and resilience along the M4 Corridor around Newport, in South East Wales. It was based upon the ability to deliver and identify measures in phases to improve affordability.

As a result of on-going discussions with the UK Government there has been a significant change in the assessment of the affordability of a major enhancement of the M4. On 26 June 2013, Edwina Hart AM CStJ MBE, Minister for Economy, Science and Transport, published the following written statement:

*“Addressing the capacity and resilience issues on the M4 around Newport is the top transport challenge that we face in ensuring that Wales has an effective economic infrastructure which improves our competitiveness and access to jobs and services.*

*As a result of ongoing discussions with the UK Government there has been a significant change in the assessment of the affordability of a major enhancement of the M4.*

*Building on the extensive development and consultation work undertaken on M4 Corridor Enhancement Measures (CEM), we will be consulting formally over the summer with Natural Resources Wales in order to go out to public consultation this September with a finalised draft Plan and Strategic Environmental Assessment (SEA) Report.*

*If implemented, the draft plan would lead to a motorway being built south of Newport.”*

The main element of the draft Plan is the provision of a section of three lane motorway between Junctions 23 and 29 on the south side of Newport. It is shown as the Black Route on page 19. The draft Plan would also include the following Complementary Measures:

Table 1 draft Plan Complementary Measures

Complementary Measure	Description
<b>Re-classify existing M4 between Magor and Castleton</b>	Re-classify the existing motorway as a trunk road, which could enable traffic management, safety and revised access measures. These could include modifications to interchanges at Magor and Castleton. Only certain classes of motorised vehicles can use motorways and they should have no traffic signals, intersections or property access. They are free of any ground level crossings with other roads, railways, or pedestrian paths, which are instead carried by overpasses and underpasses across the highway.

<sup>2</sup> The Consultation Document is available online at [www.m4newport.com](http://www.m4newport.com) or in paper copy (see page 52)

Complementary Measure	Description
<b>M48 – B4245 Link</b>	New single carriageway link between the M48 and B4245. This would potentially provide relief to Junction 23A and to the local road network. It may also facilitate the introduction of a park and ride facility at Severn Tunnel Junction in the future.
<b>Provide cycle friendly infrastructure</b>	Promoting the use of cycling as an alternative to the car for journeys of up to three miles by providing new infrastructure or improving existing infrastructure.
<b>Provide walking friendly infrastructure</b>	Promoting the use of walking as an alternative to the car for journeys of up to three miles by providing new infrastructure or improving existing infrastructure.

The consultation document also provides information on two “Reasonable Alternatives” to the draft Plan and a “Do Minimum” which considers consequences of doing nothing above what is already planned.

The main elements of the two reasonable alternatives are also shown on page 19. They are the Red Route which is a dual carriageway and the Purple Route which is a three lane motorway. Both routes would also have complementary measures.

The draft Plan does not include public transport measures because the Welsh Government has commissioned a separate study and report on proposals to develop a metro system for South East Wales. The report will focus on how a metro system could support economic growth and regeneration at key locations across South East Wales.

The Welsh Government is seeking your views on the draft Plan, which aims to address transport related problems on the M4 Corridor around Newport. We also want your views on two reasonable alternatives to the draft Plan, the Do Minimum scenario and the associated assessments which are:

- Equality Impact Assessment (EqIA);
- Strategic Environmental Assessment (SEA);
- Habitats Regulations Assessment (HRA); and
- Health Impact Assessment (HIA).

These assessments consider the potential environmental, health and equality impacts of the draft Plan, its reasonable alternatives and the Do Minimum scenario. These are separate documents but are included in the draft Plan Consultation.

Using the feedback received from the consultation, the Welsh Government will decide whether to adopt the draft Plan, with or without amendments, taking into account the responses to the associated assessments.

## 1.1 Purpose

This document provides the Equality Impact Assessment (EqIA) which is included in the draft Plan Consultation.

In accordance with the Equality Act 2010, as a strategy or programme, the Welsh Government considers that an Equality Impact Assessment (EqIA) of the M4 Corridor around Newport draft Plan is required. This EqIA assesses to what extent the draft Plan, its



reasonable alternatives and the Do Minimum scenario affect different social and demographic groups. The assessment has been undertaken in accordance with guidance provided by the Welsh Assembly Government's Equality and Human Rights Division<sup>3</sup> and prepared with due regard to the guidance provided in Welsh Transport Planning and Appraisal Guidance (WelTAG)<sup>4</sup>, the National Transport Plan Equality Impact Assessment (February 2010)<sup>5</sup>, the Wales Transport Strategy Equality Impact Assessment (2008)<sup>6</sup> and Working for Equality in Wales (May 2010)<sup>7</sup>. The assessment also reflects the Welsh Governments objectives outlined in its Strategic Equality Plan<sup>8</sup>.

## 1.2 Background

The M4 in South Wales forms part of the Trans-European Transport Network (TEN-T), which provides connections throughout Europe by road, rail, sea and air. The M4 plays a key strategic role in connecting South Wales with the rest of Europe, providing links to Ireland via the ports in South West Wales and England and mainland Europe to the east. It is a key east-west route being the main gateway into South Wales and also one of the most heavily used roads in Wales.

Providing a facility for transporting goods, linking people to jobs and employment sites as well as serving the Welsh tourism industry, the M4 is critical to the Welsh economy. Cardiff, and Newport and Swansea have ambitious regeneration strategies and Monmouthshire County Council is developing areas around Junction 23A of the M4. Rhondda Cynon Taff has important gateways onto the motorway at Junctions 32 and 34. Bridgend is served by M4 Junctions 35 and 36. Neath Port Talbot straddles the motorway and gets important access from Junctions 38 to 43. Congestion on the M4 causing unreliable journey times and reduced service levels will therefore hinder economic development in South Wales.

The M4 between Junctions 28 and 24 was originally designed as the 'Newport Bypass' with further design amendments in the 1960s to include the first motorway tunnels to be built in the UK. The M4 Motorway between Magor and Castleton does not meet modern motorway design standards. This section of the M4 has many lane drops and lane gains, resulting in some two-lane sections, an intermittent hard shoulder and frequent junctions. It is often congested, especially during weekday peak periods resulting in slow and unreliable journey times and stop-start conditions with incidents frequently causing delays.

This is why problems with congestion and unreliable journey times have been a fact of life on the M4 around Newport for many years. The motorway and surrounding highway network does not cope with sudden changes in demand or operation, for example as a result of accidents or extreme weather events for example. These issues are worse at times of peak travel (rush hour) and have worsened as the number of users on the network has increased.

The M4 Corridor around Newport is shown in Figure 1.

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<sup>3</sup> Welsh Government – Working for Equality in Wales, November 2008

<sup>4</sup> Welsh Transport Planning and Appraisal Guidance, June 2008, Welsh Assembly Government. WelTAG is a transport appraisal tool for Wales. It is applicable to transport projects, plans and programmes.

<sup>5</sup> National Transport Plan Equality Impact Assessment and Equality Action Plan, February 2010

<sup>6</sup> Wales Transport Strategy Equality Impact Assessment, 2008

<sup>7</sup> Working for Equality in Wales. Inclusive Policy Making. Second Edition Guidance, May 2010, Welsh Assembly Government

<sup>8</sup> Welsh Government: Strategic Equality Plan & Objectives, 2012-2016

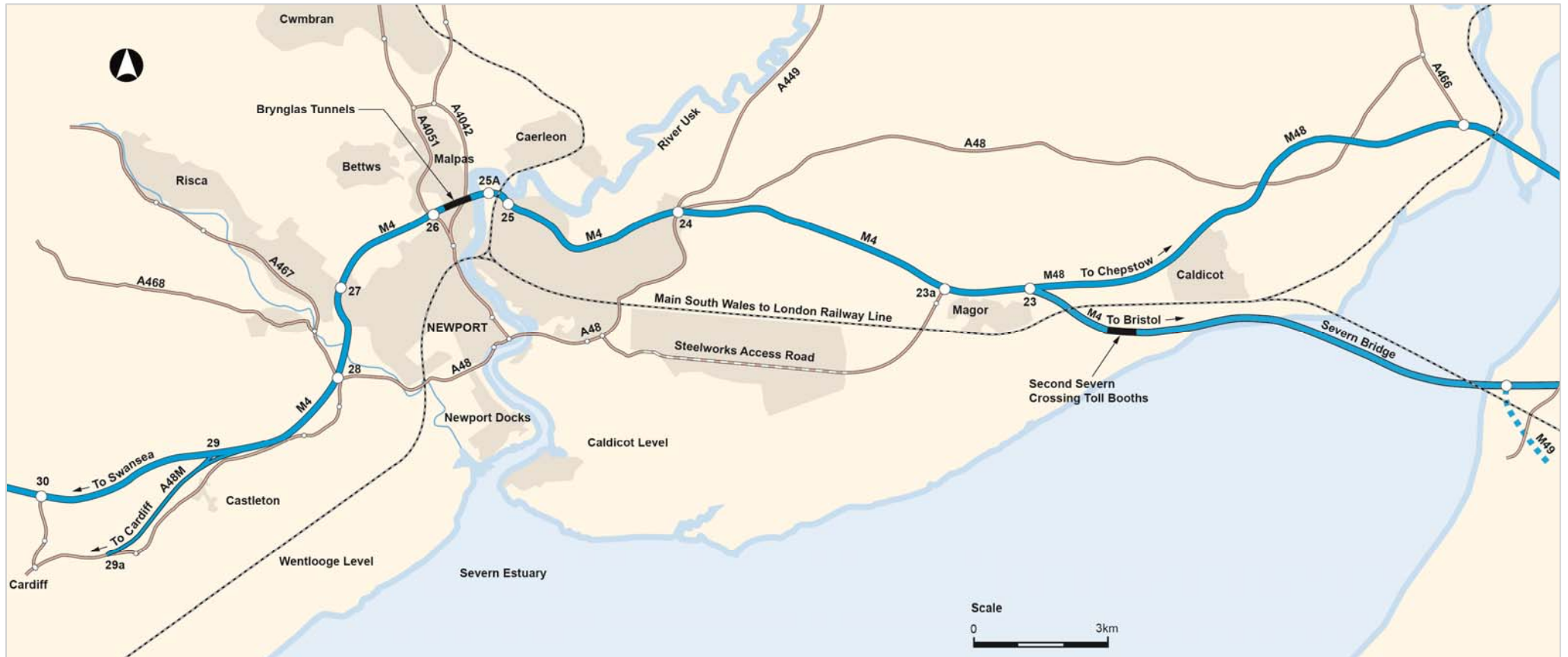


Figure 1 Location of the M4 around Newport

## 2 Problems, Aims and Goals

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### 2.1 Relationship to M4 CEM Programme

The problems, goals and aims of the M4 CEM Programme were subject to dialogue during the early stages of the engagement process, with public and stakeholders.

17 problems were identified; which encompassed issues of capacity, (network) resilience, safety and sustainable development. It is considered that the problems have not changed since 2012.

15 goals were identified and each one aimed to address one or more of the problems. As the problems have not changed there was no need to revisit the goals.

### 2.2 Problems on the M4 Corridor around Newport

The 17 identified transport related problems are listed below.

As part of the M4 CEM Consultation, respondents were asked to prioritise up to four problems out of the full list.

Problems 1,5,7 and 9 shown in bold italics were selected the most times by those who responded to the M4 CEM Consultation.

#### Capacity

- 1. A greater volume of traffic uses the M4 around Newport than it was designed to accommodate, resulting in regular congestion at peak times over extended periods.***
2. The M4 around Newport is used as a convenient cross town connection for local traffic, with insufficient local road capacity.
3. HGVs do not operate efficiently on the motorway around Newport.
4. There is insufficient capacity through some of the Junctions (e.g. 3 lane capacity drops to 2 lane capacity).
- 5. The 2-lane Brynglas tunnels are a major capacity constraint.***
6. The M4 cannot cope with increased traffic from new developments.

#### Resilience

- 7. Difficulties maintaining adequate traffic flows on the M4 and alternative highway routes at times of temporary disruption; alternative routes are not able to cope with M4 traffic.***
8. The road and rail transport system in and around the M4 Corridor is at increasing risk of disruption due to extreme weather events.
- 9. When there are problems on the M4, there is severe disruption and congestion on the local and regional highway network.***
10. The M4 requires essential major maintenance within the next 5-10 years; this will involve prolonged lane and speed restrictions, thus increasing congestion problems.
11. There is insufficient advance information to inform travel decisions when there is a problem on the M4.

## Safety

12. The current accident rates on the M4 between Magor and Castleton are higher than average for UK motorways<sup>9</sup>.
13. The existing M4 is an inadequate standard compared to modern design standards.
14. Some people's driving behaviour leads to increased accidents (e.g. speeding, lane hogging, unlicensed drivers).

## Sustainable Development

15. There is a lack of adequate sustainable integrated transport alternatives for existing road users.
16. Traffic noise from the motorway and air quality is a problem for local residents in certain areas.
17. The existing transport network acts as a constraint to economic growth and adversely impacts the current economy.

## 2.3 Aims for the M4 Corridor around Newport

The aims of the Welsh Government for the M4 Corridor around Newport are to:

1. Make it easier and safer for people to access their homes, workplaces and services by walking, cycling, public transport or road.
2. Deliver a more efficient and sustainable transport network supporting and encouraging long-term prosperity in the region, across Wales, and enabling access to international markets.
3. To produce positive effects overall on people and the environment, making a positive contribution to the overarching Welsh Government goals to reduce greenhouse gas emissions and to making Wales more resilient to the effects of climate change.

The draft Plan aims to help to achieve or facilitate these aims as part of a wider transport strategy for South East Wales, as outlined within the Prioritised National Transport Plan<sup>10</sup>.

## 2.4 Goals of the M4 Corridor around Newport

The Welsh Government with the help of the others, identified 15 goals for the M4 CEM Programme. These goals aim to address the identified transport related problems listed in section 2.2. For clarity goals are referred to as "Transport Planning Objectives" (TPOs) in WelTAG (see Glossary).

The 15 goals (listed below) provide a framework in which to appraise the relative performance at a strategic level of the draft Plan, the reasonable alternatives and the Do Minimum scenario.

As part of the M4 CEM Consultation respondents were asked to prioritise up to 4 goals out of the full 15. Goals 1,4,5 and 7 shown in bold italics were selected the most.

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<sup>9</sup> The Variable Speed Limit (VSL) system was introduced in June 2011 between Junctions 24 and 28, in order to improve safety conditions and traffic flow in the short term. The first year of operation has shown a reduction in accidents.

<sup>10</sup> National Transport Plan (2010) & Prioritised National Transport Plan (2011) Welsh Government

- 1. Safer, easier and more reliable travel east-west in South Wales.**
2. Improved transport connections within Wales and to England, the Republic of Ireland and the rest of Europe on all modes on the international transport network.
3. More effective and integrated use of alternatives to the M4, including other parts of the transport network and other modes of transport for local and strategic journeys around Newport.
- 4. Best possible use of the existing M4, local road network and other transport networks.**
- 5. More reliable journey times along the M4 Corridor.**
6. Increased level of choice for all people making journeys within the transport Corridor by all modes between Magor and Castleton, commensurate with demand for alternatives.
- 7. Improved safety on the M4 Corridor between Magor and Castleton.**
8. Improved air quality in areas next to the M4 around Newport.
9. Reduced disturbance to people from high noise levels, from all transport modes and traffic within the M4 Corridor.
10. Reduced greenhouse gas emissions per vehicle and/or person kilometre.
11. Improved travel experience into South Wales along the M4 Corridor.
12. An M4 attractive for strategic journeys that discourages local traffic use.
13. Improved traffic management in and around Newport on the M4 Corridor.
14. Easier access to local key services and residential and commercial centres.
15. A cultural shift in travel behaviour towards more sustainable choices.

## 2.5 Consequences of Doing Nothing

Analysis shows that in 2012 during peak periods (also known as ‘rush hour’), traffic flows approach 100% of capacity along sections of the M4 around Newport<sup>11</sup>. Once flows exceed 80% of capacity, traffic can expect operational problems (frequent traffic jams). The more congested road conditions become, the greater the risk of incidents and accidents occurring. In the future, the situation is expected to deteriorate further.

Forecasts of future traffic volumes show that in the Do Minimum situation, traffic congestion will be severe on most links by 2020 and by 2035 the motorway around Newport will be heavily congested, with all sections between J23A and J29 experiencing flows above 100% of capacity during weekday peak periods<sup>12</sup>.

Congestion on the M4, particularly around Cardiff and Newport, is cited by the business community in South Wales as a barrier to economic growth. Where congestion increases, the cost of transport for businesses, commuters, consumers and economic performance can be affected. Increased congestion will also result in longer journey times for commuters, reducing the effective travel to work area.

In terms of the environment, local authorities in the UK work towards meeting the national air quality objectives and if a local authority finds any places where the objectives are not likely to be achieved, it must declare an Air Quality Management Area. Out of Newport’s seven Air Quality Management Areas (AQMAs), four are associated with the M4. Higher traffic volumes along the M4 are likely to contribute not only to poor air quality, but also

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<sup>11</sup> Source: Arup analysis 2012

<sup>12</sup> Source: Arup analysis 2012

noise pollution, compromising the amenity of neighbouring residential communities. Assuming no improvements to vehicle emissions technology, the increased flows and stop start conditions will give rise to more vehicle emissions along these routes. It is important to note that stop-start congested traffic can result in higher CO<sub>2</sub> emissions than free-flowing traffic. Alongside the motorway at Newport, there are also Noise Action Planning Priority Areas (NAPPAs), which investigate where noise levels are high and help create noise action plans to address the issue.

The AQMAs in Newport are available to view on the Newport City Council website<sup>13</sup>, whilst recently published Wales Noise Maps are being used to help the Welsh Government to develop and implement a noise action plan for Wales, which is due to be published later in 2013. These are also available on the Welsh Government website<sup>14</sup>.

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<sup>13</sup> See

[http://www.newport.gov.uk/\\_dc/index.cfm?fuseaction=environmentalhealth.homepage&contentid=cont446709](http://www.newport.gov.uk/_dc/index.cfm?fuseaction=environmentalhealth.homepage&contentid=cont446709)

<sup>14</sup> See <http://data.wales.gov.uk/apps/noise/>

### 3 Previous Work

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Since 1991, much assessment and consultation has been undertaken to develop a preferred solution to the problems on the motorway around Newport. A summary of previous work is provided below and a more detailed history is documented in the M4 Corridor around Newport WeITAG Appraisal Report Stage 1 (Strategy Level)<sup>15</sup>.

For many years, concerns have been raised regarding the potential for delays on the motorway and trunk road network in South Wales.

In March 1989, the then Secretary of State for Wales commissioned the South Wales Area Traffic Survey (SWATS) to review traffic patterns over part of the trunk road network in South Wales in order to identify problem areas and propose possible solutions. The SWATS Report (1990) identified the need for substantial improvement to the M4 to address a growing capacity issue on the motorway, in particular the section between Magor and Castleton.

As a consequence, a proposal for a relief road to the south of Newport (which became known as the 'M4 Relief Road', and later, the 'New M4 Project' as a new dual 3-lane motorway) was included in the Welsh Trunk Road Forward Programme in 1991. An M4 Relief Road Preferred Route was published in 1995 and amended in 1997.

In 2004, the then Minister for Economic Development and Transport reported on the outcome of his review of transport programmes, which were undertaken to ensure a strategic fit with: 'Wales: A Better Country' and the Wales Spatial Plan. One of the conclusions of the review was that additional capacity was still required on the M4 motorway in South East Wales, in order to reduce congestion, improve resilience and remove an obstacle to greater prosperity along the whole corridor through to Swansea and West Wales. In addition to widening the motorway north of Cardiff, the Minister announced proposals to develop a New M4 south of Newport between Magor and Castleton.

Following Ministerial Review in 2004, the New M4 Project was the subject of a thorough re-examination in order to ensure fit with policies at that time and to take account of physical and legislative changes. Three key activities were undertaken:

1. A re-examination of route corridors considering, in particular, the implications and consequences of legislative changes and physical developments within the original project study area;
2. A comprehensive review of the previously published M4 Relief Road Preferred Route; and
3. A Junction Strategy Review.

The conclusion of these studies confirmed the route to the south of Newport as the optimal solution to tackling the problems of congestion on the M4 corridor around Newport. Following the Preferred Route and Junction Strategy Review, a TR111<sup>16</sup> notice (April 2006) was published to protect a revised route corridor. A series of public exhibitions were held in April and May 2006 to explain the changes to the public and other stakeholders with an interest in transport in South Wales.

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<sup>15</sup> Welsh Government, M4 Corridor around Newport, WeITAG Appraisal Report Stage 1 (Strategy Level), Arup, June 2013

<sup>16</sup> Once a preferred route is announced, Welsh Government serves a statutory notice (TR111) on the local planning authorities requiring the line to be protected from development. This is enacted under Article 19 of the Town & Country Planning (Development Management Procedure) (Wales) Order 2012.

### 3.1.1 M4 Corridor Enhancement Measures (M4 CEM) Programme

A written statement in July 2009, by the then Deputy First Minister Ieuan Wyn Jones, announced that the New M4 was not affordable. The statement, however, accepted “*the need to urgently address safety and capacity issues on the existing route*” through the introduction of “*a range of measures*”.

The M4 Corridor Enhancement Measures (CEM) Programme<sup>17</sup> was therefore initiated by the Welsh Government and this aimed to create a package of measures to deal with resilience, safety and reliability issues within the M4 corridor between Magor and Castleton.

Under the M4 CEM Programme, a long list of possible solutions was explored. Packages that combined public transport, highway and other travel solutions were identified for appraisal. These included widening of the M4 between Junctions 24 and 29 as well as improvement to the existing road network to the south of Newport city centre and a new dual carriageway all-purpose road to the south of Newport.

As part of the M4 CEM Programme, a comprehensive engagement process was launched in September 2010 culminating in a public consultation held between March and July 2012. During the engagement process, the Welsh Government and its project team engaged with both internal and external specialists and expert stakeholders. This process encompassed a diverse range of views and interests relating to transport in South Wales, as well as with people likely to be interested in and affected by any transport measures potentially adopted and implemented by Welsh Government. The consultation resulted in public support for the provision of an additional high quality road to the south of Newport<sup>18</sup>, supported by additional measures to address travel related problems within the M4 Corridor. These were referred to as Common Measures. They comprised a mix of network improvements, network management, demand management, alternative modes and smarter sustainable choices. The M4 CEM WelTAG Stage 1 (Strategy Level) Appraisal<sup>19</sup> concluded that the following measures were worthy of further consideration:

- A new dual carriageway route to the south of Newport (Red Route alternative to the draft Plan);
- Public transport enhancement; and
- Common measures.

### 3.1.2 M4 Corridor around Newport draft Plan

Recent initiatives, including discussions between the Welsh Government and HM Treasury/Department for Transport, as well as the work of the Silk Commission<sup>20</sup>, have created future potential funding opportunities for Welsh Government infrastructure projects. As a consequence, the decision was taken by the Welsh Government to further reconsider solutions to resolve transport related problems on the M4 around Newport.

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<sup>17</sup> Further details of the M4 CEM Programme and its evolution are available at [www.m4cem.com](http://www.m4cem.com).

<sup>18</sup> Welsh Government, M4 Corridor Enhancement Measures (M4 CEM), Participation Report, Arup, August 2013

<sup>19</sup> Welsh Government, M4 Corridor Enhancement Measures (M4 CEM), WelTAG Appraisal Report Stage 1 (Strategy Level), Arup, March 2013

<sup>20</sup> The ‘Silk’ Commission on Devolution in Wales, which is reviewing the case for the devolution of fiscal powers and reviewing the powers of the National Assembly for Wales, due to report in Spring 2014.



Thus, in order to inform the strategy for the M4 Corridor around Newport, a further M4 Corridor around Newport WelTAG Stage 1 (Strategy Level) Appraisal<sup>21</sup> has been undertaken of options that include M4 CEM measures, provision of new motorway capacity routed to the south of Newport and complementary measures. The options considered within the WelTAG Appraisal were as follows:

1. A new section of 3-lane motorway to the south of Newport following the protected (TR111) route (Black Route);
2. A new dual 2-lane all-purpose road to the south of Newport following an alignment that would allow it to be constructed in phases (Red Route);
3. A new section of 3-lane motorway to the south of Newport along a similar alignment to the all-purpose road (Purple Route);
4. Public transport measures; and
5. Complementary measures.

The M4 Corridor around Newport WelTAG Stage 1 (Strategy Level) Appraisal concluded that a new section of 3-lane motorway to the south of Newport following a protected (TR111) route, in addition to complementary measures, would best achieve the goals and address the problems of the M4 Corridor around Newport, and should be progressed for further appraisal.

These options have subsequently formed the basis for the development of the draft Plan, which is described further in Section 4.

The M4 Corridor around Newport WelTAG Stage 1 (Strategy Level) Appraisal also acknowledged that public transport enhancement will contribute to some of the goals of the M4 Corridor around Newport. The draft Plan does not include public transport measures because the Welsh Government has commissioned a separate study and report on proposals to develop a metro system for South East Wales. That report will focus on how a metro system could support economic growth and regeneration at key locations across South East Wales.

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<sup>21</sup> Welsh Government, M4 Corridor around Newport, WelTAG Appraisal Report Stage 1 (Strategy Level), Arup, June 2013.

## 4 The draft Plan

In recognising the range of the goals for the M4 Corridor around Newport, the draft Plan combines both highway infrastructure and other demand management solutions in identifying a preferred strategy.

**The draft Plan for the M4 Corridor around Newport (the preferred strategy) consists of:**

- **A new section of 3-lane motorway between Magor and Castleton to the south of Newport along the TR111 protected corridor of the Black Route; and**
- **Complementary Measures (see table 2 overleaf).**

**The reasonable alternatives to the draft Plan include:**

- **A dual 2-lane all-purpose road (Red Route); or**
- **A motorway solution along a similar alignment (Purple Route); in addition to**
- **Complementary Measures.**

**The draft Plan and the reasonable alternatives have been assessed against the ‘Do Minimum’ scenario.** The Do Minimum scenario means doing nothing above what is already planned or committed.

The preferred strategy and reasonable alternatives are described in more detail below and illustrated in Figure 2 on page 19.

### 4.1 The draft Plan (Preferred Strategy)

#### 4.1.1 Motorway following TR111 Protected Route – The Black Route and Complementary Measures

This preferred strategy comprises the construction of a new 3-lane motorway mainly following the protected TR111 ‘Black Route’, between Junctions 23 and 29, including a new crossing of the River Usk south of Newport. The River Usk is designated as a Special Area of Conservation (SAC).

The TR111 route to the south of Newport has remained protected for planning purposes since April 2006. The alignment of this proposed new section of motorway has been developed following extensive consultation, investigation and analysis. The aim is to minimise the impact on the environment, whilst fully meeting current motorway design and safety standards. Minor changes to the alignment of the TR111 protected route could still be made, subject to further investigation, if this option is taken forward. This motorway solution would be delivered as one scheme.

If this draft Plan is adopted a junction strategy would be investigated as part of scheme’s development.

The alignment of the Black Route is shown in the context of local constraints in Figure 2 on page 19.

In addition to the new highway infrastructure, there are additional complementary measures that could assist in alleviating travel related problems within the M4 Corridor around Newport. The draft Plan’s complementary measures are as follows:

Table 2 draft Plan Complementary Measures

Complementary Measure	Description
<b>Re-classify existing M4 between Magor and Castleton</b>	Re-classify the existing motorway as a trunk road, which could enable traffic management, safety and revised access measures. These could include modifications to interchanges at Magor and Castleton. Only certain classes of motorised vehicles can use motorways and they should have no traffic signals, intersections or property access. They are free of any ground level crossings with other roads, railways, or pedestrian paths, which are instead carried by overpasses and underpasses across the highway.
<b>M48 – B4245 Link</b>	New single carriageway link between the M48 and B4245. This would potentially provide relief to Junction 23A and to the local road network. It may also facilitate the introduction of a park and ride facility at Severn Tunnel Junction in the future.
<b>Provide cycle friendly infrastructure</b>	Promoting the use of cycling as an alternative to the car for journeys of up to three miles by providing new infrastructure or improving existing infrastructure.
<b>Provide walking friendly infrastructure</b>	Promoting the use of walking as an alternative to the car for journeys of up to three miles by providing new infrastructure or improving existing infrastructure.

## 4.2 Reasonable Alternatives to the draft Plan

### 4.2.1 Dual 2-lane All-Purpose Road – The Red Route and Complementary Measures

This option involves the construction of an additional high quality road to the south of Newport, as a dual carriageway solution. The route aims to minimise negative impacts on local communities and the environment. As a dual carriageway on this corridor alignment, the road could be delivered in phases by tying into the existing road network in Newport. Delivery could thus be phased with availability of funding. However, the main benefits would only be realised when the route is complete.

This road would require a new crossing of the River Usk, which is designated as a Special Area of Conservation (SAC).

The alignment of the Red Route is further north compared to that of the Black Route and the impact on the Port of Newport operations may be less. However, the alignment would pass through and have significant impact upon the Newport City Council's Docks Way landfill site. The route runs close to the residential area, Duffryn. There are also on-going and potential further development sites along this route.

The alignment of the Red Route is shown in the context of local constraints on Figure 2 on page 19.

In addition, the following complementary measures could assist the Red Route in alleviating travel related problems within the M4 Corridor around Newport:

Table 3 Red Route Complementary Measures

Complementary Measure	Description
<b>M48 – B4245 Link</b>	New single carriageway link between the M48 and B4245. This would potentially provide relief to Junction 23A and to the local road network. It may also facilitate the introduction of a park and ride facility at Severn Tunnel Junction in the future.
<b>Provide cycle friendly infrastructure</b>	Promoting the use of cycling as an alternative to the car for journeys of up to three miles by providing new infrastructure or improving existing infrastructure.
<b>Provide walking friendly infrastructure</b>	Promoting the use of walking as an alternative to the car for journeys of up to three miles by providing new infrastructure or improving existing infrastructure.

#### 4.2.2 Motorway along Alternative Alignment to the South of Newport – The Purple Route and Complementary Measures

In order to fully represent the highway options to the south of Newport, this option comprises a 3-lane motorway along a similar route to that which is proposed for the Red Route (dual 2-lane all-purpose road). A difference between the two routes being the purple route has a more northerly alignment to cross the northern end of the North Dock at the Port of Newport.

This new motorway would require a new crossing of the River Usk, which is designated as a Special Area of Conservation (SAC).

The alignment of the Purple Route is such that the impact on the Port of Newport is minimised. However, there could be significant impact upon the Newport City Council's Docks Way landfill site. The route runs close to the residential area, Dyffryn. There are also on-going and potential further development sites along this route.

The alignment of the Purple Route is shown in the context of local constraints on Figure 2 on page 19.

In addition, the following complementary measures could assist the Purple Route in alleviating travel related problems within the M4 Corridor around Newport:

Table 4 Purple Route Complementary Measures

Complementary Measure	Description
<b>Re-classify existing M4 between Magor and Castleton</b>	Re-classify the existing motorway as a trunk road, which could enable traffic management, safety and revised access measures. These could include modifications to interchanges at Magor and Castleton. Only certain classes of motorised vehicles can use motorways and they should have no traffic signals, intersections or property access. They are free of any ground level crossings with other roads, railways, or pedestrian paths, which are instead carried by overpasses and underpasses across the highway.

Complementary Measure	Description
<b>M48 – B4245 Link</b>	New single carriageway link between the M48 and B4245. This would potentially provide relief to Junction 23A and to the local road network. It may also facilitate the introduction of a park and ride facility at Severn Tunnel Junction in the future.
<b>Provide cycle friendly infrastructure</b>	Promoting the use of cycling as an alternative to the car for journeys of up to three miles by providing new infrastructure or improving existing infrastructure.
<b>Provide walking friendly infrastructure</b>	Promoting the use of walking as an alternative to the car for journeys of up to three miles by providing new infrastructure or improving existing infrastructure.

### 4.3 Do Minimum Scenario

The Welsh Government is committed to continuing to improve transport in South Wales. Practical measures to make travel safer and easier on the M4 motorway around Newport have included replacing sections of steel central barriers with concrete barriers, the introduction of Variable Speed Limit systems and improvements to the roundabout at Junction 24 at Coldra.

The Do Minimum scenario means doing nothing above what is already planned or committed. This scenario therefore comprises minimum intervention but in this case does include a number of highway schemes, which are currently committed to be completed between 2020 and 2035 as follows:

#### **Welsh Government Schemes:**

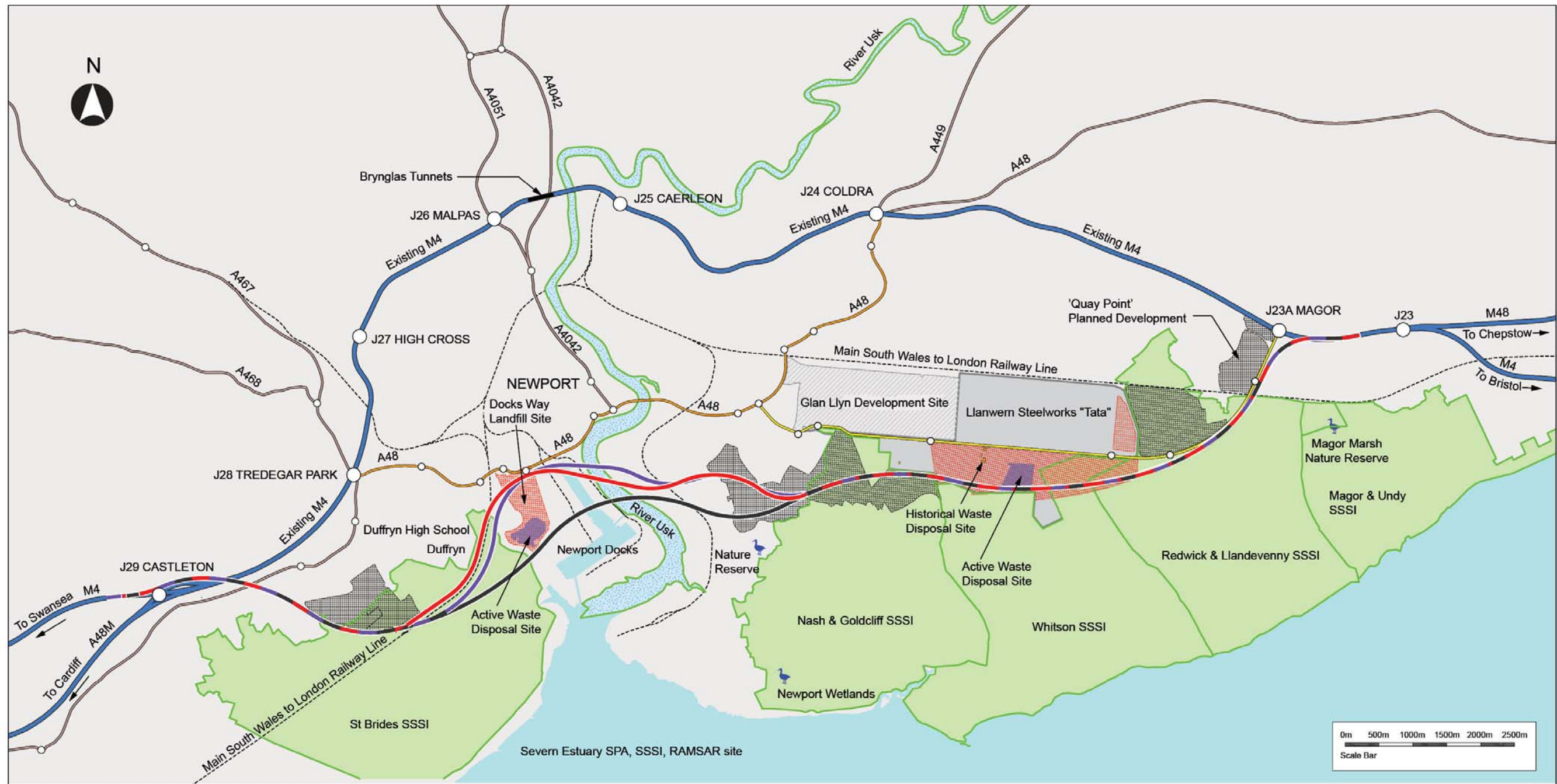
- The recently opened Newport Steelworks Access Road Phases 1 and 2 (the former Llanwern Steelworks access road);
- Junction 28 roundabout, enlarged signalled gyratory scheme including associated improvements to the A467 Bassaleg roundabout and A48 Pont Ebbw; and
- A465 Heads of the Valleys dualling (Gilwern to Hirwaun).

#### **Newport City Council Scheme:**

- Link through Newport Eastern Expansion Areas between Steelworks Access Road and A48 SDR (Cot Hill junction, signalised with full movements).

Alongside these schemes, the Do Minimum scenario also consists of a number of development proposals throughout South East Wales, which are committed through the planning process and are due to be completed at various stages to 2035.

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**Legend**

- Black Route (the main element of the draft Plan)
- Red Route (the main element to the 'reasonable alternative' to the draft Plan)
- Purple Route (the main element to the 'reasonable alternative' to the draft Plan)
- Employment Land Allocation from Newport Unitary Development Plan
- Newport Southern Distributor Road
- Steelworks Access Road
- Existing Railway Lines
- Sites of Special Scientific Interest (SSSI)
- River Usk SAC and SSSI

Figure 2 Black, Purple and Red Route shown within the local study area and main constraints around Newport

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## 5 Equality Impact Assessment

### 5.1 Introduction

The Welsh Government is committed to improving the lives of the people in Wales and to achieving best practice in equality and human rights. The goal of the Wales Transport Strategy<sup>22</sup>, One Wales: Connecting the Nation is to “*promote sustainable transport networks that safeguard the environment while strengthening the country’s economic and social life.*” It is important, therefore, that transport encompasses those social, economic and environmental interactions.<sup>23</sup> The Wales Transport Strategy sets the framework for the National Transport Plan and its strategic priorities.

Paragraphs 8.7.1 to 8.7.3 of WelTAG provide the context for the transport appraisal of equality, diversity and human rights. It states that the Welsh Government will ensure that all demographic groups, particularly under-represented groups, can take advantage of transport services. Therefore, all transport proposals seeking public funding and/or the approval of the Welsh Government must take account of differing needs and their equality impacts. All equality impact groups should be considered including age, sexual orientation, religion or belief and human rights generally.

Problems with transport contribute to social exclusion by preventing people from participating in work or learning, or accessing healthcare, food shopping and other local activities. As highlighted by the UK Social Exclusion Unit<sup>24</sup>, the problems are understood to largely affect access to:

- **Work:** Two out of five jobseekers say lack of transport is a barrier to getting a job;
- **Learning:** Nearly half of 16–18-year-old students say they find their transport costs hard to meet;
- **Health:** Over a 12-month period, 1.4 million people miss, turn down or choose not to seek medical help because of transport problems;
- **Food:** 16% of people without cars find access to supermarkets hard, compared with 6% of people with cars; and
- **Social activities:** 18% of non-car owners find seeing friends and family difficult because of transport problems, compared with 8% of people with access to a car.

The links between transport and social exclusion are expansive and varied as outlined by research undertaken by the Fédération Internationale de l'Automobile (FIA) Foundation<sup>25</sup>. In summary, the issues are understood to be:

- Access to a car, particularly outside of major cities, seems to be essential to full participation in economic and social life in modern industrialised societies;
- Lack of access to a car is the main transport factor in the social exclusion of low-income households and other marginalised groups;
- Even for families without cars, the share of public transport trips is lower than the share of trips by car;

<sup>22</sup> One Wales Connecting the Nation. The Wales Transport Strategy, 2008

<sup>23</sup> National Transport Plan Equality Impact Assessment and Equality Action Plan, February 2010

<sup>24</sup> Social Exclusion Unit – Making the Connections: Report on Transport and Social Exclusion, 2003

<sup>25</sup> FIA Foundation – Transport & Social Exclusion, Evaluating the Contribution of Transport Projects to Welfare to Work – An International Study, 2006

- Improving public transport in isolation is no longer an adequate solution to the poor accessibility experienced by low-income and marginalised groups; and
- Dispersed land uses, changing work and lifestyle patterns and the closure of local amenities, increasing car dependence, has exacerbated the problems of poor access for non-car owning households.

## 5.2 What is an Equality Impact Assessment?

The National Transport Plan EqIA describes an Equality Impact Assessment as a way of examining and analysing services, policies and strategies that identifies existing and potential impacts on certain groups of people, and sometimes individuals. It allows decision makers to make informed decisions that can be evidenced and published. An EqIA can also identify improvements and better ways of delivering goals.

The Welsh Government has specific and general duties in relation to equality and human rights<sup>26</sup>. The legislative framework for equality and human rights comprises:

1. The Government of Wales Act 2006. Section 77(1) states that: *“The Welsh Ministers must make appropriate arrangements with a view to ensuring that their functions are exercised with due regard to the principle that there should be equality of opportunity for all people.”*
2. The Equality Act 2010 came into force in April 2011. This brings together all the legal requirements on equality that organisations in the private, public and voluntary sectors are required to meet. The Act replaces existing equality law including the Equal Pay Act 1970, the Race Relations Act 1976, the Sex Discrimination Act 1975 and the Disability Discrimination Act 1995<sup>27</sup>.
3. The Human Rights Act 1998.

The statutory equality duties of the Welsh Government are summarised in Table 8.3 of WelTAG and the National Transport Plan EqIA. These are listed as follows:

### Race

- To promote equality of opportunity;
- To eliminate race discrimination;
- To promote good race relations.

### Disability

- To promote equality of opportunity between disabled people and other people;
- To eliminate discrimination that is unlawful;
- To eliminate harassment of disabled people that is related to their disability;
- To promote positive attitudes towards disabled people;
- To encourage participation by disabled people in public life;
- To take steps to meet disabled people’s needs, even if that requires more favourable treatment.

<sup>26</sup> Working for Equality in Wales, Inclusive Policy Making Second Edition Guidance, May 2010

<sup>27</sup> <http://wales.gov.uk/topics/equality/equalityactatwork/equalityact10/?lang=en>

## Gender

- To eliminate discrimination and harassment; and
- To promote equality of opportunity between men and women.

WelTAG is an iterative process and as such, the EqIA may need to be updated following completion of WelTAG Stage 1 at a scheme level. Furthermore, for any options that are progressed as part of a draft Plan, it is likely that depending on their scale and location, they will require further Equality Impact Assessment at a scheme level, to avoid, reduce and, if possible, remedy any significant adverse impacts on people.

## 6 EqIA Appraisal

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An assessment of the draft Plan, its reasonable alternatives and the Do Minimum scenario has been undertaken to appraise the significance of the following protected characteristics groups, as outlined in Annex B of the Welsh Government's guidance on Equality Impact Assessments<sup>28</sup>:

- Age;
- Disability;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion and belief;
- Sex (gender); and
- Sexual orientation.

In addition, the following appraisal criteria will also be subject to assessment as outlined in WeITAG:

- Welsh language; and
- Other: Lone parent, economic inactivity, social and multiple deprivation.

### 6.1 Scoping

A scoping report was prepared in relation to this EqIA and was made available to the Welsh Government's Equality Support Unit within the department of the Economy, Transport and Science, as well as the Welsh Government's wider Equality and Diversity Department (Fairer Futures) for comment, for a five week period commencing 9 July 2013. This outlined the Welsh Government's proposed approach to undertaking EqIA.

Specifically, the scoping consultation posed the following questions:

1. Other than that available at the Welsh Government Equality and Diversity website, is there any additional guidance that should be taken into account as part of this assessment?
2. Are there any additional organisations or parties that we should consider contacting as part of this EqIA?
3. In addition to those identified within the scoping paper, are there any particular issues that should be addressed in detail as part of this assessment?

The responses received as part of the scoping exercise have been incorporated into this assessment of the draft Plan. Relevant EqIA scoping responses are provided at Appendix A.

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<sup>28</sup> Welsh Government, Working for Equality in Wales – Equality Impact Assessment Guidance (November 2012)

## 6.2 Consultation

A series of public exhibitions were held in April and May 2006 to engage with the public and other stakeholders on the New M4 Project (at a scheme level). Furthermore, recognising the potential level of public interest in transport related issues within the M4 Corridor around Newport and beyond, and the numbers of people potentially affected by any new plans resulting from possible options, the Welsh Government undertook wide-ranging and focussed engagement with stakeholders and local people from September 2010 as part of the M4 CEM Programme (at a strategy level).

During the engagement process, the Welsh Government and its project team conducted dialogue and deliberative sessions both with internal and external specialists and expert stakeholders, encompassing local authorities, community groups and other organisations with an interest in the likely social and equality impacts of transport measures on the M4 Corridor around Newport. This input has helped to shape the development of a draft Plan and its associated assessments, which remain at a strategy level. Should the draft Plan be adopted by the Welsh Government, with or without amendments, any options taken forward for further appraisal would be progressed as a project and therefore assessed at a scheme level of detail.

The Equality and Human Rights Division of the Welsh Government was consulted on the proposed scope of the EqIA and it has been prepared with due regard to the guidance provided in WelTAG, the National Transport Plan Equality Impact Assessment (February 2010)<sup>29</sup>, the Wales Transport Strategy Equality Impact Assessment (2008)<sup>30</sup> and Working for Equality in Wales (May 2010)<sup>31</sup>.

A public consultation on the draft Plan and its associated assessments, including this EqIA, will commence in September 2013.

## 6.3 Appraisal

The impact of the draft Plan on equality has been considered with reference to relevant WelTAG criteria. An evidence base has been prepared as part of the WelTAG appraisal of the options. It provides a summary of baseline conditions as well as an appraisal of social, economic and environmental criteria.

As recommended by WelTAG, an EqIA appraisal summary table has been prepared for the draft Plan to qualitatively assess the potential effects on equality. In order to make the appraisal information easier to understand, each measure has been assessed using a 7 scale colour coding system technique that is adopted in WelTAG:

Large Positive Impact	(+++)
Moderate Positive Impact	(++)
Slight Positive Impact	(+)
No (or Minimal) Impact	(0)
Slight Negative Impact	(-)
Moderate Negative Impact	(--)
Large Negative Impact	(---)

<sup>29</sup> National Transport Plan Equality Impact Assessment and Equality Action Plan, February 2010

<sup>30</sup> Wales Transport Strategy Equality Impact Assessment, 2008

<sup>31</sup> Working for Equality in Wales. Inclusive Policy Making. Second Edition Guidance, May 2010, Welsh Assembly Government

A summary of each of the options is provided in the following sections and is accompanied by a high level qualitative assessment of potential impacts on equality in an appraisal summary table.

EqIA is an iterative process. This document forms an initial assessment and in order to assist with the EqIA of the draft Plan, information about respondents to the draft Plan Consultation is being sought via the single Response Form (see Section 9). This form is seeking information on the age, sex and nationality of respondents, should they wish to provide this information as part of their response, to help the Welsh Government's analysis of the responses to the consultation, relevant to equality, diversity and social inclusion. If the evidence collected highlights the fact that all groups of people (and certain protected groups)<sup>32</sup> are not sufficiently represented, the Welsh Government would consider exploring the potential impacts of the draft Plan, engaging with the Equality Support Unit of the Welsh Government Department for Economy, Science and Transport as necessary.

In order to attract comments from all groups of people, publicity that promotes the draft Plan consultation will be wide ranging. A comprehensive approach to publicity has been prepared with the aim of targeting representative groups across South Wales. Details of publicity and consultation events are summarised within the associated M4 Corridor around Newport draft Plan Consultation Document<sup>33</sup> and outlined at [www.m4newport.com](http://www.m4newport.com).

Following the draft Plan Consultation, this data and any relevant comments will then be incorporated into a finalised EqIA Report, with a statement of results. Should the draft Plan be adopted, this will then be published.

Furthermore, for any options that may be progressed as part of the draft Plan, should it be adopted, it is likely that depending on their scale and location, they will require further EqIA at a project (scheme) level, to avoid, reduce and, if possible, remedy any significant adverse impacts. As such, further liaison with stakeholders will be considered by the Welsh Government in the future. At this stage of further assessment the EqIA would also further consider each of the character groups in more detail (e.g. the assessment would consider the different types of disability, rather than disability in general).

An appraisal summary table is provided in Section 7 to provide a comparison of the preliminary EqIA results. These will be updated to take into consideration any comments received during the draft Plan Consultation, as outlined above.

The following assessment focusses on the character groups identified above, assessing the likely effect of the draft Plan on the equality of those who use the M4, those who dwell in communities alongside the proposed routes and those who dwell in the communities alongside the existing M4. Where it is felt that an option would not necessarily improve equality for a specific group, but would also not worsen their situation, a neutral (0) score has been selected.

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<sup>32</sup> These are described as protected characteristics for the purposes of the Equality Act 2010.

<sup>33</sup> Available online at [www.m4newport.com](http://www.m4newport.com) or in paper copy – see Section 9.

## Age

Levels of car ownership are closely linked with age.<sup>34</sup> The younger population under 17 are unable to drive. In addition, the elderly are more likely to have to give up their car due to declining health and finances.<sup>35</sup> When young people reach the late teens (16 years and over) their mobility needs expand to encompass travel to work, training, further education, leisure and other services. Their needs become more complex, they are likely to travel further distances, and to travel at night as well as during the day. By their late teens, the range of travel modes increases to include driving, which is seen predominantly as the optimum form of travel.<sup>36</sup> In addition, the time taken to travel makes part-time evening jobs unviable for many young people.<sup>37</sup> As people age, they become less likely to travel by private transport, and there is a particular decline in levels of car driving. Travel as a car passenger, by bus and by taxi increases with age.<sup>38</sup>

The United Nations Convention on the Rights of the Child (UNCRC) is an international agreement that protects the human rights of children under the age of 18. It was ratified by the UN General Assembly in 1989. In 1991 the United Kingdom formally agreed to ensure that every child in the UK has all the rights listed in the convention. The Welsh Government adopted the Convention as the basis for policy making for children and young people in Wales in 2004. There are 54 articles in the Convention. Articles 43-45 are about how adults and governments should work together to make sure all children are entitled to their rights.

Table 5 considers how the draft Plan, its reasonable alternatives and the do minimum scenario would impact on people of all ages.

Table 5 EqIA Appraisal – Age

Topic	Assessment	Distribution	Significance
<b>Draft Plan</b>	<p>The Black Route and its complementary measures would lead to a reduction in traffic congestion, improved resilience and journey time reliability. This would bring benefits to people of all ages who have access to a car, improving local trips and access to the wider region and offering the resilience required to accommodate predicted future growth. The Black Route would therefore improve access to services and facilities (e.g. education and healthcare) as well as employment opportunities for those in work. The Black Route would also improve safety for those driving, reducing the number of accidents.</p> <p>The Black Route and its complementary measures would be unlikely to benefit those without access to a car, unless public transport services operate along the new road.</p> <p>The complementary measures could bring increased walking and cycling facilities, implemented to modern safety and design standards. These could provide benefits to</p>	People of all ages.	(++)

<sup>34</sup> Bevan Foundation – Accessibility for all – public transport and social inclusion in Wales

<sup>35</sup> DfT – Older people: Their transport needs and requirements

<sup>36</sup> DfT – Evidence Base Review on Mobility: Choices & Barriers for Different Social Groups

<sup>37</sup> DfT – Young people and transport: Their needs and requirements

<sup>38</sup> DfT – Evidence Base Review on Mobility: Choices & Barriers for Different Social Groups

Topic	Assessment	Distribution	Significance
	<p>people of all ages who do not have access to a car through improve connections to undertake local trips or access public transport facilities. Complementary measures could also bring health benefits to people of all ages through promoting walking and cycling locally.</p> <p>Issues of safety and personal security would be considered at the detailed design stage.</p>		
<p><b>Reasonable Alternative: Red Route and Complementary Measures</b></p>	<p>The Red Route and its complementary measures would bring some benefit in terms of reduced congestion, improved resilience and journey time reliability; however, benefits would not be as great as the Black or Purple routes due to the capacity and distance of the dual carriageway. The phased nature of the Red Route could bring local benefits in the short term with wider, regional benefits emerging on scheme completion. Benefits would include access to education, employment, services and facilities for all those with access to a car. However, the route would not offer as much resilience to accommodate future growth when compared with the Black and Purple routes and therefore may require upgrading in the long term.</p> <p>The Red Route and its complementary measures would be unlikely to benefit those without access to a car.</p> <p>The complementary measures, through improved walking and cycling facilities could provide a positive benefit to all those who may not have access to a car and therefore depend on alternative transport modes. This could include younger people to access education, those of working age to access employment and the older population to access services / facilities.</p> <p>Issues of safety and personal security would be considered at the detailed design stage.</p>	<p>People of all ages.</p>	<p>(+)</p>
<p><b>Reasonable Alternative: Purple Route and Complementary Measures</b></p>	<p>The Purple Route and its complementary measures would lead to a reduction in traffic congestion, improved resilience and journey time reliability. This would bring benefits to people of all ages who have access to a car, improving local trips and access to the wider region and offering the resilience required to accommodate predicted future growth. The Purple Route would therefore improve access to services and facilities (e.g. education for young and healthcare for the older population) as well as employment opportunities for those in work. The Purple Route would also improve safety for those driving, reducing</p>	<p>People of all ages.</p>	<p>(++)</p>



Topic	Assessment	Distribution	Significance
	<p>the number of accidents.</p> <p>The Purple Route and its complementary measures would be unlikely to benefit those without access to a car, unless public transport services operate along the new road.</p> <p>The complementary measures could bring increased walking and cycling facilities, implemented to modern safety and design standards. These could provide benefits to people of all ages who do not have access to a car through improve connections to undertake local trips or access public transport facilities. Complementary measures could also bring health benefits to people of all ages through promoting walking and cycling locally.</p> <p>Issues of safety and personal security would be considered at the detailed design stage.</p>		
<b>Do Minimum</b>	<p>The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which would impact on journey time reliability. This would impact on people of all ages with access to a car or who rely on a car to access education, employment and services / facilities.</p> <p>The Do Minimum scenario would also impact on people of all ages who do not have access to a car but rely on public transport, particularly during peak periods where traffic would divert to local roads, exacerbating local accessibility issues.</p>	People of all ages.	(-)

## Disability

Disabled people have fewer transport options and often lack access to cars.<sup>39</sup> However, people with mobility difficulties or health problems tend to use cars because they are convenient compared to public transport or walking.<sup>40</sup>

Research shows that inaccessible transport has an extensive impact on the lives of many disabled people<sup>41</sup>.

Table 6 EqIA Appraisal – Disability

Topic	Assessment	Distribution	Significance
<b>Draft Plan</b>	<p>The Black Route and its complementary measures would lead to a reduction in traffic congestion, improved resilience and journey time reliability. This would bring benefits to those with a disability who have access to a car, making both local and regional trips more accessible. This would improve access to key support services, facilities and employment opportunities. The Black Route would be unlikely to benefit those without access to a car, unless public transport services operate along the new road.</p> <p>The complementary measures could bring benefits to those with a disability, without access to a car if walking and cycling links are built with ‘access for all’ in mind. The measures could also improve links to public transport facilities, therefore improving accessibility for non –car users to facilities, services and employment.</p> <p>Issues of safety and personal security would be considered at the detailed design stage.</p>	Disabled persons	(+)
<b>Reasonable Alternative: Red Route and Complementary Measures</b>	<p>The Red Route and its complementary measures will offer improvements to traffic congestion, improved resilience and journey time reliability. However, this will be to a lesser extent than the Black and Purple routes due to the capacity and distance of the dual carriageway with reduced resilience to accommodate growth in the long term.</p> <p>The Red Route could bring local accessibility benefits in the short term and regional benefits on completion, assisting those with a disability to access support services, facilities and employment opportunities. This reasonable alternative is unlikely to benefit those without access to a car, unless public transport services operate along the new road.</p> <p>The complementary measures could bring benefits to those with a disability if</p>	Disabled persons	(+)

<sup>39</sup> National Transport Plan Equalities Impact Assessment (February 2010)

<sup>40</sup> DfT – The Travel Choices and Needs of Low Income Households: the Role of the Car

<sup>41</sup> Leonard Cheshire – Mind the Gap

Topic	Assessment	Distribution	Significance
	<p>designed with ‘access for all’ in mind. This could improve access to local services, facilities and employment and more generally to public transport options. Issues around safety and personal security will be considered at the detailed design stage.</p>		
<p><b>Reasonable Alternative: Purple Route and Complementary Measures</b></p>	<p>The Purple Route and its complementary measures would lead to a reduction in traffic congestion, improved resilience and journey time reliability. This would bring benefits to those with a disability who have access to a car, making both local and regional trips more accessible. This would improve access to key support services, facilities and employment opportunities. The Purple Route would be unlikely to benefit those without access to a car, unless public transport services operate along the new road.</p> <p>The complementary measures could bring benefits to those with a disability without access to a car if walking and cycling links are built with ‘access for all’ in mind. The measures could also improve links to public transport facilities, therefore improving accessibility for non –car users to facilities, services and employment.</p> <p>Issues of safety and personal security would be considered at the detailed design stage.</p>	<p>Disabled persons</p>	<p>(+)</p>
<p><b>Do Minimum</b></p>	<p>The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which would impact on journey time reliability. This would impact negatively on those with a disability (with access to a car), reducing access to services, facilities and employment opportunities.</p> <p>The Do Minimum scenario would also impact on disabled people who do not have access to a car but rely on public transport, particularly during peak periods where traffic would divert to local roads, exacerbating local accessibility issues.</p> <p>Compounding accessibility issues would be likely to lead to a lower quality of life for those with a disability.</p>	<p>Disabled persons</p>	<p>(-)</p>

## Gender Reassignment

There is growing recognition of the discrimination, inequalities and social exclusion that trans people face by policy makers and the public. This includes bullying and discriminatory treatment in schools, harassment and physical/sexual assault and rejection from families, work colleagues and friends.<sup>42</sup>

Table 7 EqIA Appraisal - Gender Reassignment

Topic	Assessment	Distribution	Significance
<b>Draft Plan</b>	<p>The Black Route and its complementary measures would bring reduced traffic congestion, improved resilience and journey time reliability. This would bring benefit to all with access to a car in terms of access to support services, facilities and employment opportunities.</p> <p>The Black Route itself would be unlikely to benefit those without access to a car, however, the complementary measures could bring benefits in relation to local accessibility to services and facilities as well as improved access to public transport facilities, enabling wider accessibility. In relation to issues of discrimination and personal safety, the complementary measures would improve the standard and safety of walking and cycling routes.</p> <p>Issues around safety and personal security would be considered at the detailed design stage.</p>	Those proposing to undergo, who are undergoing or have undergone a process for the purpose of reassigning gender.	(0)
<b>Reasonable Alternative: Red Route and Complementary Measures</b>	<p>The Red Route and its complementary measures would bring reduced congestion, improved resilience and journey time reliability, although to a lesser extent than the Black and Purple routes due to the capacity and distance of the dual carriageway. The phased nature of the scheme could bring local accessibility benefits to all in the short term with wider regional benefits in the longer term in relation to access to support services, facilities and employment opportunities.</p> <p>The Red Route itself would be unlikely to benefit those without access to a car, however, the complementary measures could bring benefits in relation to local accessibility to services and facilities as well as improved access to public transport facilities, enabling wider accessibility.</p> <p>In relation to issues of discrimination and personal safety, the complementary measures would improve the standard and safety of walking and cycling routes, however, issues around safety and personal security would be considered at the detailed design stage.</p>	Those proposing to undergo, who are undergoing or have undergone a process for the purpose of reassigning gender.	(0)

<sup>42</sup> Trans Research Review, National Centre for Social Research (2009) - [http://www.equalityhumanrights.com/uploaded\\_files/research/trans\\_research\\_review\\_rep27.doc](http://www.equalityhumanrights.com/uploaded_files/research/trans_research_review_rep27.doc)

Topic	Assessment	Distribution	Significance
<p><b>Reasonable Alternative: Purple Route and Complementary Measures</b></p>	<p>The Purple Route and its complementary measures would bring reduced traffic congestion, improved resilience and journey time reliability. This would bring benefit to all with access to a car in terms of access to support services, facilities and employment opportunities.</p> <p>The Purple Route itself would be unlikely to benefit those without access to a car, however, the complementary measures could bring benefits in relation to local accessibility to services and facilities as well as improved access to public transport facilities, enabling wider accessibility.</p> <p>In relation to issues of discrimination and personal safety, the complementary measures would improve the standard and safety of walking and cycling routes.</p> <p>Issues around safety and personal security would be considered at the detailed design stage.</p>	<p>Those proposing to undergo, who are undergoing or have undergone a process for the purpose of reassigning gender.</p>	<p>(0)</p>
<p><b>Do Minimum</b></p>	<p>The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which will impact on journey time reliability. This would impact negatively on those wishing to access support services, facilities and employment opportunities by car.</p> <p>The Do Minimum scenario would also impact on those reliant on alternative transport modes, particularly during peak periods where traffic would divert to local roads, exacerbating local accessibility issues. Safety concerns on existing walking and cycling links and on public transport would also remain.</p>	<p>Those proposing to undergo, who are undergoing or have undergone a process for the purpose of reassigning gender.</p>	<p>(-)</p>

## Marriage and Civil Partnership

Car ownership is closely related to the number of households and the number of people in the household. Generally, car owning households tend to have more than one person (most non-car owning households are single person households) and recent growth in car ownership has largely been through increases in the number of households with two or more cars.<sup>43</sup>

In line with these trends, those who are married or in a civil partnership are more likely to have access to a car or more than one car.

Table 8 EqIA Appraisal - Marriage and Civil Partnership

Topic	Assessment	Distribution	Significance
<b>Draft Plan</b>	<p>The Black Route and its complementary measures would bring reduced traffic congestion, improved resilience and journey time reliability. This would bring direct benefit to married couples and those in a civil partnership with access to a car, improving accessibility to employment opportunities, services and facilities.</p> <p>For those couples that rely on other transport modes, the complementary measures could bring improved walking and cycling links to the local area and public transport facilities. The complementary measures therefore offer potential to improve local non-car accessibility while also offering health benefits through improved walking and cycling facilities.</p>	Married couples or those in a civil partnership.	(+)
<b>Reasonable Alternative: Red Route and Complementary Measures</b>	<p>The Red Route and its complementary measures would bring reduced traffic congestion, improved resilience and journey time reliability, although to a lesser extent than the Black and Purple Routes due to the capacity and distance of the dual carriageway. This would bring direct benefit to married couples and those in a civil partnership with access to a car, improving accessibility to employment opportunities, services and facilities, however, due to the phased nature of this reasonable alternative, benefits could be local in the short term, broadening to the region on completion of the scheme.</p> <p>For those couples that rely on other transport modes, the complementary measures could bring improved walking and cycling links to the local area and public transport facilities. The complementary measures therefore offer potential to improve local non-car accessibility while also offering health benefits through improved facilities.</p>	Married couples or those in a civil partnership.	(+)

<sup>43</sup> Royal Automobile Club Foundation for Motoring – Car Ownership in Great Britain (2008)

Topic	Assessment	Distribution	Significance
<p><b>Reasonable Alternative: Purple Route and Complementary Measures</b></p>	<p>The Purple Route and its complementary measures would bring reduced traffic congestion, improved resilience and journey time reliability. This would bring direct benefit to married couples and those in a civil partnership with access to a car, improving accessibility to employment opportunities, services and facilities.</p> <p>For those couples that rely on other transport modes, the complementary measures could bring improved walking and cycling links to the local area and public transport facilities. The complementary measures therefore offer potential to improve local non-car accessibility while also offering health benefits through improved walking and cycling facilities.</p>	<p>Married couples or those in a civil partnership.</p>	<p>(+)</p>
<p><b>Do Minimum</b></p>	<p>The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which would impact on journey time reliability. This would impact negatively on those who are married / in a civil partnership wishing to access services, facilities and employment opportunities by car.</p> <p>The Do Minimum scenario would also impact on those reliant on alternative transport modes, particularly during peak periods where traffic would divert to local roads, exacerbating local accessibility issues.</p>	<p>Married couples or those in a civil partnership.</p>	<p>(-)</p>

## Pregnancy and Maternity

Pregnant women or those that have recently given birth are more reliant on services and facilities such as GP’s, hospitals and community facilities.

Research shows that women are generally more dependent than men on public transport<sup>44</sup>.

Alongside accessibility needs, research suggests that exposure to air pollution during early and late pregnancy may curb the normal growth of the developing fetus<sup>45</sup>.

Table 9 EqIA Appraisal – Pregnancy and Maternity

Topic	Assessment	Distribution	Significance
<b>Draft Plan</b>	<p>The Black Route and its complementary measures would bring reduced traffic congestion, improved resilience and journey time reliability, benefitting those with access to a car, improving accessibility to key facilities and services (e.g. healthcare / support groups).</p> <p>The Black Route is aligned furthest from the main areas of residential properties, particularly around the area of Duffryn. This option also takes a significant proportion of traffic off the existing M4 which passes through a number of residential areas to the north of Newport. This could reduce the exposure of pregnant women to air pollution associated with traffic.</p> <p>The potential for improved walking and cycling infrastructure as part of complementary measures could improve accessibility, particularly to public transport facilities, improving access to services and facilities relied upon during pregnancy and maternity.</p>	Pregnant women or new parents.	(+)
<b>Reasonable Alternative: Red Route and Complementary Measures</b>	<p>The Red Route and its complementary measures would bring reduced traffic congestion, improved resilience and journey time reliability, although to a lesser extent than the Black and Purple Routes due to the capacity and distance of the dual carriageway. Although this would bring benefit to those with access to a car by improving accessibility to key facilities and services (e.g. healthcare and support), the phased nature of this alternative means benefits could be felt locally in the short-term with more widespread benefits only felt on scheme completion.</p> <p>The Red Route runs closer to areas of population than the Black, particularly around Duffryn to the south of Newport. The route would also remove less traffic from the existing M4 corridor, bringing</p>	Pregnant women or new parents.	(+)

<sup>44</sup> Welsh Consumer Council – People without cars

<sup>45</sup> Journal of Epidemiology and Community Health – Ambient Air Pollutant Concentrations During Pregnancy and the Risk of Fetal Growth Restriction (2009)



Topic	Assessment	Distribution	Significance
	<p>less benefit in terms of air quality improvements for residential areas to the north of Newport.</p> <p>The potential for improved walking and cycling infrastructure as part of complementary measures could improve accessibility, particularly to public transport facilities, improving access to services and facilities relied upon during pregnancy and maternity.</p>		
<p><b>Reasonable Alternative: Purple Route and Complementary Measures</b></p>	<p>The Purple Route and its complementary measures would bring reduced traffic congestion, improved resilience and journey time reliability, benefitting those with access to a car, improving accessibility to key facilities and services (e.g. healthcare / support groups).</p> <p>While the Purple Route would remove similar levels of traffic from the existing M4 as the Black Route, bringing air quality benefits to residential areas to the north of Newport, it does run closer to residential areas to the south of Newport, potentially impacting on air quality and pregnant women.</p> <p>The potential for improved walking and cycling infrastructure as part of complementary measures could improve accessibility, particularly to public transport facilities, improving access to services and facilities relied upon during pregnancy and maternity.</p>	<p>Pregnant women or new parents.</p>	<p>(+)</p>
<p><b>Do Minimum</b></p>	<p>The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which will impact on journey time reliability. This would impact negatively on pregnant women or new parents wishing to access healthcare and support services whether by car or by alternative transport modes.</p> <p>This scenario would also lead to increasing transport levels on the existing M4 which could bring decreasing air quality around the residential areas to the north of Newport.</p>	<p>Pregnant women or new parents</p>	<p>(-)</p>

## Race

Research by the Department for Transport (DfT) has shown that people in households of black origin are least likely to have access to a car or to travel to work by car. Slightly more households of Indian origin reported having a car than those from White British or White Irish households, while persons of white origin are generally more likely to travel to work by car than those from Indian, Pakistani or Bangladeshi origins. Adults from black and minority ethnic groups share with adults on low income the problems of accessing employment opportunities without a private vehicle.<sup>46</sup>

Research also shows how minority ethnic and faith communities are often concerned about racist attacks and all aspects of personal safety on the transport network, including when walking or cycling. The fear can be a barrier to using the transport network to access key facilities and employment opportunities<sup>47</sup>.

Table 10 EqIA Appraisal – Race

Topic	Assessment	Distribution	Significance
<b>Draft Plan</b>	The Black Route and its complementary measures would bring reduced traffic congestion, improved resilience and journey time reliability for those with access to a car. This would improve access to facilities, services and employment opportunities. Unless public transport services operate along the new road, it is unlikely to benefit those without access to a car. Complementary measures could improve access to facilities, services and employment through improved walking and cycling networks and opportunities for public transport along the reclassified road. Issues of safety and personal security would be considered at the detailed design stage.	Minority ethnic and faith communities	(+)
<b>Reasonable Alternative: Red Route and Complementary Measures</b>	The Red Route and its complementary measures would bring reduced traffic congestion, improved resilience and journey time reliability, although to a lesser extent than the Black and Purple Routes due to the capacity and distance of the dual carriageway. This could bring local accessibility benefits in the short term with regional benefits felt on scheme completion. The Route would therefore improve access to facilities, services and employment opportunities for those with access to a car. Complementary measures could improve access to facilities, services and employment through improved walking and cycling networks and improved links to public transport. Issues of safety and personal security would be considered at the detailed design stage.	Minority ethnic and faith communities	(+)

<sup>46</sup> DfT – Focus on Personal Travel (2005 edition).

<sup>47</sup> DfT – Public Transport Needs of Minority, Ethnic and Faith Communities Guidance Pack

Topic	Assessment	Distribution	Significance
<p><b>Reasonable Alternative: Purple Route and Complementary Measures</b></p>	<p>The Purple Route and its complementary measures would bring reduced traffic congestion, improved resilience and journey time reliability for those with access to a car. This would improve access to facilities, services and employment opportunities. Unless public transport services operate along the new road, it is unlikely to benefit those without access to a car.</p> <p>Complementary measures could improve access to facilities, services and employment through improved walking and cycling networks and opportunities for public transport along the reclassified road.</p> <p>Issues of safety and personal security would be considered at the detailed design stage.</p>	<p>Minority ethnic and faith communities</p>	<p>(+)</p>
<p><b>Do Minimum</b></p>	<p>The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which will impact on journey time reliability. This would bring negative impacts to those reliant on the car to access facilities, services and employment opportunities, as well as those utilising public transport for this purpose, with traffic diverting to local roads during peak periods.</p>	<p>Minority ethnic and faith communities</p>	<p>(-)</p>

## Religion and Belief

People who are of a particular religion or belief have very specific access requirements to facilities such as religious establishments, community facilities and or other services.

Research has shown that faith communities are often concerned about racist attacks and all aspects of personal safety on the transport network, including when walking or cycling. The fear can be a barrier to using the transport network to access key facilities and employment opportunities<sup>48</sup>.

Table 11 EqIA Appraisal – Religion and Belief

Topic	Assessment	Distribution	Significance
<b>Draft Plan</b>	<p>The Black Route and its complementary measures would bring reduced traffic congestion, improved resilience and journey time reliability for those with access to a car. This would improve access to facilities (including religious establishments), although it is not considered the draft Plan would necessarily improve the situation for those of a particular religion or belief.</p> <p>Unless public transport services operate along the new road, it is unlikely to benefit those without access to a car.</p> <p>Complementary measures could improve access to facilities, services and employment through improved walking and cycling networks and opportunities for public transport along the reclassified road.</p> <p>Issues of safety and personal security would be considered at the detailed design stage.</p>	Those of a particular religion or belief.	(0)
<b>Reasonable Alternative: Red Route and Complementary Measures</b>	<p>The Red Route and its complementary measures would bring reduced traffic congestion; improved resilience and journey time reliability, although to a lesser extent than the Black and Purple Routes due to the capacity and distance of the dual carriageway. This could bring local accessibility benefits in the short term with regional benefits felt on scheme completion. The Route would therefore improve access to facilities (including religious establishments), although it is not considered the alternative would necessarily improve the situation for those of a particular religion or belief.</p> <p>Complementary measures could improve access to facilities, services and employment through improved walking and cycling networks and improved links to public transport.</p>	Those of a particular religion or belief.	(0)

<sup>48</sup> DfT – Public Transport Needs of Minority, Ethnic and Faith Communities Guidance Pack

Topic	Assessment	Distribution	Significance
	<p>Issues of safety and personal security would be considered at the detailed design stage.</p>		
<p><b>Reasonable Alternative: Purple Route and Complementary Measures</b></p>	<p>The Purple Route and its complementary measures would bring reduced traffic congestion, improved resilience and journey time reliability for those with access to a car. This would improve access to facilities (including religious buildings), although it is not considered the alternative would necessarily improve the situation for those of a particular religion or belief.</p> <p>Unless public transport services operate along the new road, it would be unlikely to benefit those without access to a car.</p> <p>Complementary measures could improve access to facilities, services and employment through improved walking and cycling networks and opportunities for public transport along the reclassified road.</p> <p>Issues of safety and personal security would be considered at the detailed design stage.</p>	<p>Those of a particular religion or belief.</p>	<p>(0)</p>
<p><b>Do Minimum</b></p>	<p>The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which will impact on journey time reliability. This would bring negative impacts to those reliant on the car to access facilities, services and employment opportunities, as well as those utilising public transport for this purpose, with traffic diverting to local roads during peak periods.</p> <p>Despite this it is not considered the Do Minimum scenario would specifically worsen the situation for those of a particular religion or belief.</p>	<p>Those of a particular religion or belief.</p>	<p>(0)</p>

## Sex (Gender)

A higher proportion of adult men than adult women have full car driving licences in all age groups.<sup>49</sup> 83% of male respondents use a car or van to travel to work compared with only 76% of female respondents.<sup>50</sup> Men are more likely to travel for work purposes than women, while women are more likely to take social and personal business journeys (including escorting children to school). Women are less likely to have access to a car, and more likely to travel by bus, foot or taxi than are men, arguably reflecting men's use of the car to travel to work. Women are more likely than men to be responsible for childcare. As such they face specific difficulties associated co-ordinating these responsibilities with work<sup>51</sup>.

Women make fewer and shorter trips as a car driver compared to their male counterparts.<sup>52</sup> Over all age groups and all modes, men tend to travel 40% further than women.<sup>53</sup> Women are more dependent than men on public transport<sup>54</sup>.

Table 12 EqIA Appraisal – Sex (Gender)

Topic	Assessment	Distribution	Significance
<b>Draft Plan</b>	<p>The Black Route and its complementary measures would bring reduced traffic congestion, improved resilience and journey time reliability. This would benefit both male and female drivers, improving access to employment as well as facilities and services (e.g. childcare / education).</p> <p>The potential for improved walking and cycling infrastructure as part of complementary measures may improve accessibility, particularly to public transport facilities. While this could provide a positive benefit for women who are more dependent on public transport services than men, issues of safety and personal security would be considered at the detailed design stage.</p> <p>Complementary measures would also improve the overall provision of walking and cycling facilities, promoting a healthier lifestyle and potentially bringing health benefits.</p>	Women and men	(+)

<sup>49</sup> Equal Opportunities Commission – Promoting gender equality in transport

<sup>50</sup> Welsh Government (2008). Public Transport Use in Wales, 2005-2006. Statistical Bulletin 29/2008

<sup>51</sup> DfT – Evidence Base Review on Mobility: Choices & Barriers for Different Social Groups

<sup>52</sup> DfT – In car safety and the personal security needs of female drivers and passengers

<sup>53</sup> DfT – Public transport gender audit evidence base

<sup>54</sup> Welsh Consumer Council – People without cars

Topic	Assessment	Distribution	Significance
<p><b>Reasonable Alternative: Red Route and Complementary Measures</b></p>	<p>The Red Route and its complementary measures would bring reduced traffic congestion, improved resilience and journey time reliability, although to a lesser extent than the Black or Purple Routes due to the capacity and distance of the dual carriageway. This reasonable alternative could offer short-term benefits through phasing, with longer term strategic benefits emerging over a longer period of time, improving access to employment, services and facilities.</p> <p>As part of complementary measures, the potential for improved walking and cycling infrastructure may improve accessibility to employment, services and facilities for those without access to a car. Complementary measures would also improve the overall provision of walking and cycling facilities, promoting a healthier lifestyle and potentially bringing health benefits to all genders.</p>	<p>Women and men</p>	<p>(+)</p>
<p><b>Reasonable Alternative: Purple Route and Complementary Measures</b></p>	<p>The Purple Route and its complementary measures would bring reduced traffic congestion, improved resilience and journey time reliability. This would benefit both male and female drivers, improving access to employment as well as facilities and services (e.g. childcare / education).</p> <p>The potential for improved walking and cycling infrastructure as part of complementary measures may improve accessibility, particularly to public transport facilities. While this could provide a positive benefit for women who are more dependent on public transport services than men, issues of safety and personal security would be considered at the detailed design stage.</p> <p>Complementary measures would also improve the overall provision of walking and cycling facilities, promoting a healthier lifestyle and potentially bringing health benefits to all genders.</p>	<p>Women and men</p>	<p>(+)</p>
<p><b>Do Minimum</b></p>	<p>The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which would impact on journey time reliability. This would continue to impact on both males and females who are reliant on the car for accessing employment, services and facilities.</p> <p>This would also continue to impact on those reliant on public transport for accessing employment, services and facilities with traffic re-routing to local roads during peak hours, compounding congestion locally.</p>	<p>Women and Men</p>	<p>(-)</p>

## Sexual Orientation

Sexual orientation means a person’s sexual orientation towards a) persons of the same sex, b) persons of the opposite sex, or c) persons of either sex.

Research has shown that many lesbian, gay, or bisexual (LGB) people living in rural or suburban districts can only access appropriate social activities, support groups, or help and advocacy services by public transport<sup>55</sup>. Those most seriously affected by this are LGB with limited mobility, the elderly, the poor and the young, reflecting trends described in other character groups in relation to access to a car.

However, a key barrier for LGB communities accessing transport include personal security – 11% of the LGB community reported that they avoided public transport due to safety concerns<sup>56</sup>.

Table 13 EqIA Appraisal – Sexual Orientation

Topic	Assessment	Distribution	Significance
<b>Draft Plan</b>	<p>The Black Route and its complementary measures would not directly impact on LGB groups any differently to non-LGB peers, as described above.</p> <p>The complementary measures could provide additional and / or improved walking and cycling facilities, bringing a positive benefit for LGB groups without a car and improving access to public transport interchanges.</p> <p>Issues of safety and personal security would be considered at the detailed design stage.</p>	LGB groups	(0)
<b>Reasonable Alternative: Red Route and Complementary Measures</b>	<p>The Red Route and its complementary measures would not directly impact on LGB groups any differently to non-LGB peers, as described above.</p> <p>The complementary measures could provide additional and / or improved walking and cycling facilities, bringing a positive benefit for LGB groups without a car and improving access to public transport interchanges.</p> <p>Issues of safety and personal security would be considered at the detailed design stage.</p>	LGB groups	(0)

<sup>55</sup> The Intercom Trust – The Extended Neighbourhood

<sup>56</sup> Diversity Matters Hastings/ Hastings Rainbow Alliance – Report into Homophobic and Transphobic Hate Crimes in Hastings



Topic	Assessment	Distribution	Significance
<b>Reasonable Alternative: Purple Route and Complementary Measures</b>	The Purple Route and its complementary measures would not directly impact on LGB groups any differently to non-LGB peers, as described above. The complementary measures could provide additional and / or improved walking and cycling facilities which could bring a positive benefit for LGB groups without a car and improve access to public transport interchanges. Issues of safety and personal security would be considered at the detailed design stage.	LGB groups	(0)
<b>Do Minimum</b>	The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which would impact on journey time reliability. There would be limited improvements to infrastructure which would negatively impact on many LGB groups who rely on transport modes other than the car to access activities and services.	LGB groups	(-)

## Welsh Language

Support by the population in Wales for Welsh-language service provision is well evidenced. Over nine out of ten Welsh speakers (with a range of fluency levels) take the view that Welsh-language service provision is important to keep the language alive<sup>57</sup>.

Table 14 EqIA Appraisal – Welsh Language

Topic	Assessment	Distribution	Significance
<b>Draft Plan</b>	The provision of bi-lingual information at road junctions and along walking and cycling facilities would be considered at the detailed design stage.	Welsh speakers	(0)
<b>Reasonable Alternative: Red Route and Complementary Measures</b>	The provision of bi-lingual information at road junctions and along walking and cycling facilities would be considered at the detailed design stage.	Welsh speakers	(0)
<b>Reasonable Alternative: Purple Route and Complementary Measures</b>	The provision of bi-lingual information at road junctions and along walking and cycling facilities would be considered at the detailed design stage.	Welsh speakers	(0)
<b>Do Minimum</b>	Current road signs are bi-lingual and any additional signs implemented as part of the do minimum improvements would be bi-lingual.	Welsh speakers	(0)

<sup>57</sup> <http://wales.gov.uk/depc/publications/welshlanguage/wlstrategy2012/wlstrategy2012?lang=en> A Living Language. A Language for Living, Welsh Language Strategy 2012–17

## Other: Lone Parent, Economic Inactivity, Social and Multiple Deprivation

Half of households in the bottom income bracket do not own a car, compared to a national average of 25%. This figure is even higher for individuals on benefits: nearly two-thirds of people claiming income support or jobseeker’s allowance do not have access to a car<sup>58</sup>. 13% of respondents of working-age said they had decided not to apply for a particular job in the last 12 months because of transport problems<sup>59</sup>.

The South Wales business community have previously raised concerns about the impact of current congestion and delays on production costs and the overall competitiveness of transport reliant business in Wales. Concerns have also been expressed in relation to the impact of problems on the M4 corridor around Newport in relation to the perception of South Wales from potential investors.

Table 15 EqIA Appraisal – Other

Topic	Assessment	Distribution	Significance
<b>Draft Plan</b>	<p>The Black Route and its complementary measures would bring reduced traffic congestion, improved resilience and journey time reliability which would benefit all users with access to a car accessing facilities, services and employment opportunities. This could improve accessibility to health, care, training and education facilities and services. However this may primarily benefit those with access to a private vehicle.</p> <p>The implementation of the draft Plan would support regional economic development, through enhanced accessibility to employment centres and improving the movement of people and freight. This would lead to improved economic outcomes which might be considered to contribute to economic activity.</p> <p>Some property demolition may be needed to accommodate the Black Route. This would be considered at the detailed design stage.</p> <p>The Black Route would improve traffic conditions and pollution levels along the route of the existing motorway, which would positively impact on properties in the urban area north of Newport.</p> <p>The complementary measures, through delivering additional and/or improved walking and cycling facilities, could lead to an increased level of choice and easier access to key local services and commercial centres while also offering opportunities for health benefits.</p>	Income related groups	(++)

<sup>58</sup> Campaign for Better Transport - Transport, social equality and welfare to work

<sup>59</sup> DfT – Evidence Base Review on Mobility: Choices & Barriers for Different Social Groups

Topic	Assessment	Distribution	Significance
<p><b>Reasonable Alternative: Red Route and Complementary Measures</b></p>	<p>The Red Route and its complementary measures would bring reduced traffic congestion; improved resilience and journey time reliability, although to a lesser extent than the Black and Purple Routes due to the capacity and distance of the dual carriageway. The Route would benefit all users with access to a car accessing facilities, services and employment opportunities.</p> <p>This could improve accessibility to health, care, training and education facilities and services. However this may primarily benefit those with access to a private vehicle and could be felt over a longer period than the Black and Purple Routes given the phased nature of the Red Route.</p> <p>The implementation of the Red Route would support regional economic development, although anticipated impacts will be lower than the Black and Purple Routes, felt locally in the short term, with wider regional benefits potentially being realised on scheme completion.</p> <p>Some property demolition may be needed to accommodate the Red Route. This will be considered at the detailed design stage.</p> <p>The Red Route would improve traffic conditions and pollution levels along the route of the existing motorway, although to a lesser extent than the Black and Purple Routes given scale and the phased nature of the Red Route. The Red Route also runs closer to the residential area of Duffryn to the south of Newport when compared with the Black.</p> <p>The complementary measures, through delivering additional and/or improved walking and cycling facilities, could lead to an increased level of choice and easier access to key local services and commercial centres while also offering opportunities for health benefits.</p>	<p>Income related groups</p>	<p>(+)</p>
<p><b>Reasonable Alternative: Purple Route and Complementary Measures</b></p>	<p>The Purple Route and its complementary measures would bring reduced traffic congestion, improved resilience and journey time reliability which would benefit all users with access to a car accessing facilities, services and employment opportunities.</p> <p>This could improve accessibility to health, care, training and education facilities and services. However this may primarily benefit those with access to a private vehicle.</p>	<p>Income related groups</p>	<p>(++)</p>

Topic	Assessment	Distribution	Significance
	<p>The implementation of the Purple Route would support regional economic development, through enhanced accessibility to employment centres and improving the movement of people and freight. This would lead to improved economic outcomes which might be considered to contribute to economic activity.</p> <p>Some property demolition may be needed to accommodate the Purple Route. This would be considered at the detailed design stage.</p> <p>The Purple Route would improve traffic conditions and pollution levels along the route of the existing motorway, which will positively impact on properties in the urban area north of Newport. However, the Route alignment is closer to the area of Duffryn when compared to the Black Route, potentially bringing air quality and noise impacts in this area.</p> <p>The complementary measures, through delivering additional and/or improved walking and cycling facilities, could lead to an increased level of choice and easier access to key local services and commercial centres while also offering opportunities for health benefits.</p>		
<b>Do Minimum</b>	<p>The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which will impact on journey time reliability. This would impact those reliant on the car to access services, facilities and employment opportunities.</p> <p>This continuation of reported problems would also continue to hamper economic growth potential of the region, restricting the movement of people and freight, particularly at peak periods.</p> <p>Air quality and noise issues would also continue along the current alignment, impacting on residential areas to the north of Newport.</p>	Income related groups	(--)

## 7 EqIA Appraisal Summary

Table 16 provides a comparative summary of the initial EqIA appraisal of the draft Plan, the reasonable alternatives, and the Do Minimum scenario.

Table 16 EqIA Appraisal Comparative Summary

Equalities and WeITAG Criteria	Appraisal of draft Plan & Reasonable Alternatives			
	Preferred Strategy : Black Route and Complementary Measures	Reasonable Alternative: Red Route and Complementary Measures	Reasonable Alternative: Purple Route and Complementary Measures	Do Minimum
<b>Age</b>	(++)	(+)	(++)	(-)
<b>Disability: physical, sensory or mental</b>	(+)	(+)	(+)	(-)
<b>Gender Reassignment</b>	(0)	(0)	(0)	(-)
<b>Marriage and Civil Partnership</b>	(+)	(+)	(+)	(-)
<b>Pregnancy and maternity</b>	(+)	(+)	(+)	(-)
<b>Race</b>	(+)	(+)	(+)	(-)
<b>Religion and Belief</b>	(0)	(0)	(0)	(0)
<b>Sex</b>	(+)	(+)	(+)	(-)
<b>Sexual orientation</b>	(0)	(0)	(0)	(-)
<b>Welsh language</b>	(0)	(0)	(0)	(0)
<b>Other: Lone parent, economic inactivity, social and multiple deprivation</b>	(++)	(+)	(++)	(--)

The above summary highlights that there are no significant adverse effects arising for any character group through the draft Plan or either of the reasonable alternatives. What is clear from the assessment is that all options other than the Do Minimum scenario would bring benefits to all character groups with access to a car, with the draft Plan (Black Route) and the Purple Route reasonable alternative bringing the greatest benefit in terms of reduced traffic congestion, improved resilience and journey time reliability.

All Routes have the potential to benefit each of the character groups in terms of improved accessibility with varying degrees of benefit dependent upon need (e.g. improved access to healthcare for pregnant women and new parents).

Alongside those with access to the car, the Black and Purple Routes also bring benefit to those reliant on public transport to access services, facilities and employment. These options reduce the amount of traffic on local roads during peak periods that currently divert in order to avoid congestion on the M4 corridor. While the Red Route would offer some benefit, the phased nature of this option means benefits would be felt to a lesser extent until the full scheme is complete.

The complementary measures that support their respective highway options would bring a variety of benefits, with improvements to walking and cycling infrastructure, offering improved access to local services, facilities and employment, as well as improved access to public transport facilities for those reliant on public transport for local and regional travel.

The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which would impact on journey time reliability. This would adversely impact on access to services, facilities and employment opportunities for all those with access to a car, and who rely on public transport due to continued problems associated with motorway traffic diverting onto local roads to avoid peak congestion. The continuing problems would further hamper economic growth and prosperity in the region, restricting the movement of freight and people, particularly at peak periods.

## 8 Action Plan

Table 17 provides an overview of potential actions that the Welsh Government may consider as part of progressing any options within the draft Plan, should it be adopted, with or without amendments. The actions suggested below aim to enhance the possible beneficial impacts and/or mitigate against any potential adverse impacts on equality areas.

Following the draft Plan Consultation, this Action Plan would be updated to take into account any relevant comments received. This would then be published within a final M4 Corridor around Newport EqIA Report with a statement of results. Furthermore, this Action Plan would help to inform further EqIA, if necessary, at a project (scheme) level, for any options that are progressed as part of the draft Plan, should it be adopted by the Welsh Government.

Most of the actions are relevant to a project (scheme) level of appraisal and monitoring would be undertaken by the Welsh Government, although this is also likely to be more appropriate at a project (scheme) level.

Table 17 Action Plan

Actions to be considered	Rationale	Who will benefit
<b>Ensure ergonomically designed access to public transport facilities that facilitate use for all.</b>	The design of access to public transport services should cater for all needs and mobility issues.	Women with children Older people Disabled people
<b>Plan appropriate pedestrian routes and conveniently located interchanges to public transport services, discussed in partnership with community groups and operators. Design-out crime at public transport interchanges.</b>	To improve personal security and encourage use of public transport.	Younger people Older people Ethnic groups LGB/T
<b>Ensure clear and appropriate signage and information services are displayed at public transport interchanges and along road routes.</b>	Effective signage and information supports access to transport services and aids mobility.	Younger people Older people Ethnic groups
<b>Ensure inclusive design principles are incorporated into the design of new junctions to accommodate non-motorised users.</b>	To ensure inclusive access to those not travelling by car.	Older people Disabled people
<b>Offer appropriate compensation for properties requiring demolition, including replacement of any community facilities.</b>	To ensure certain community groups are not disproportionately affected by demolition and/or construction works.	Lower socio-economic groups Older people Ethnic groups

## 9 How to respond to this consultation document

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Please respond to this Consultation by using the Consultation Response Form that accompanies this document. This can be completed and sent to the address shown below:

***'FREEPOST M4 CONSULTATION'***.

Alternatively, you can respond electronically via the following website links:

- [www.wales.gov.uk/consultations](http://www.wales.gov.uk/consultations) under Transport; or
- [www.m4newport.com](http://www.m4newport.com).

At [www.m4newport.com](http://www.m4newport.com) you can also find further information about the draft Plan and its development.

**This Consultation runs for 12 weeks, commencing on 23 September 2013 and closes on 16 December 2013.**

The draft Plan Consultation Document, all draft Plan assessments, and the Response Form are available to download online at [www.m4newport.com](http://www.m4newport.com) and are available to view or to take away as paper copies at the following deposit points, during the consultation period:

- Caldicot One Stop Shop, NP26 5DB;
- Castleton Village Hall, CF3 2UW;
- Liswerry Post Office, NP19 0JX;
- Magor Post Office, NP26 3EP;
- Newport Central Library, NP20 1PA;
- Newport Information Station, Newport, NP20 4AX; and
- Welsh Government, Cathays Park, Cardiff, CF10 3NQ.

Documents are also available at public drop-in exhibitions (see the draft Plan Consultation Document or [www.m4newport.com](http://www.m4newport.com) for details).

Sufficient quantities of the consultation documents will be made available at each of the public drop-in exhibitions, where additional copies may also be requested for delivery.

Large print versions of this document are made available on request.

**For further information please contact Allan Pitt (Communications Manager) via:**

- ***Email: [m4newport@arup.com](mailto:m4newport@arup.com);***
- ***Telephone: 029 20473727; or***
- ***Mail: Allan Pitt, Arup, 4 Pierhead Street, Cardiff CF10 4QP.***



## Appendix A

### EqIA Scoping Responses

## A1 Welsh Government Department for Economy, Science and Transport Equality Support Unit

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EST Equality Support Unit (ESU) have reviewed the scoping document and would make the following comments which we hope you will find useful and provide answers to the three questions raised in Section 4 of the Report directed to ESU and Fairer Futures. Sorry for the long email hopefully its not as bad as it looks. As agreed with [redacted], I have copied her in to this response for information and to allow her to add or comment on the points raised.

As I said to [redacted] previously it's great to see that the EqIA is a part of the Transport Planning process and that it is a standard consideration in projects like this. The scoping document contains loads of good ideas and an excellent initial scoping document. For example its good to see that following changes to earlier project proposals the EqIA is going to be re-assessed and that information and evidence gathered previously will be used (page 18 & 20). Its also very good to see in this high level scoping document that should any adverse impacts be identified further project level EqIA's would be considered (page 22). Its also clear that consultation is an integral part of your process.

Here are our thoughts on this scoping document as presented.

- The main observation is in relation to the EqIA consultation process which I discussed with Mark recently. The consultation process is mentioned in a several places throughout the Scoping Report (for example page 4 Paragraph 3, page 5 paragraph 1, page 9 para 4, page 20 paragraph 4 & Page 20 paragraph 6). Statements within the report are along the lines of “there is a comprehensive engagement process”, “public consultation”, “encompassing a diverse range of views”, “extensive stakeholder and community engagement and consultation”. The question is around how that process will involve people in the 9 protected characteristics identified in the Equality Act 2010 and how you will evidence their involvement. From reading the scope report questions arise like who will be involved? how will they be invited? who actually attends and crucially how will we know that the people involved have represented the protected groups.
- Consultation is clearly going to be an integral part of this process which is great and page 9 refers to the regulations being used to frame that consultation process. What would make it excellent and fit with the requirements of the Equality Act 2010 that also contains a specific duty to consult, is evidence of the demographics of the people contributing to the consultation process. This evidence if collected, would allow you to present a clear and strong statement in the EqIA that we people from the 9 protected characteristic groups have been represented in the consultation process. Alternatively, if the evidence collected highlights the fact that protected groups were not sufficiently represented, we could then consider alternative methods of consultation or to widen the exercise in some way. It would be good to try think about this up front to try to ensure the consultation processes encourage and facilitate participation of those people from the protected groups. Things like who we invite, where we advertise, the process itself and targeting the information to

relevant representative groups is going to be important. I discussed possible options with Mark when we met and of course we would be happy to discuss this further if required. Hopefully this addresses Question 2 in section 4 which asks us to consider if there are any additional organisations or parties that you should consider contacting. I don't think we can be more specific until we see the list of the stakeholder groups you intend to involve. Please let us know if you need any advice or assistance on any of this.

Other more general points;

- We note the reference on page 18 to the EqIA being undertaken according to Welsh Government's Fairer Futures guidance available on the WG intranet. As per my discussion with Mark and Allan Pitt of Arup this guidance and template is there to help you through the process and gives you a clear steer on what should be covered by your Equality Impact Assessment. We also acknowledge that as long as all the points are covered, you may build into your assessments issues or formats from other guidance or policies and not follow the WG (Fairer Futures) process exactly.
- Page 19 outlines where work will be undertaken including the core Equality considerations and some additional considerations like Welsh Language. It's important to mention that the UN Rights of the Child legislation has been adopted by the Welsh Government and Ministers are required to consider the Rights of the Child in all their policy decisions. We can offer some advice in this area and there is a specific Rights of the Child team headed by [redacted] and a specific intranet page and training.
- Page 19 of the report lists the 9 protected characteristics identified in the Equality Act 2010. I have attached below a copy of a summary sheet entitled "Copy of Duties and protected Characteristics." Please note that for Marriage and Civil Partnership only the first General Duty applies. Happy to explain the implications of this if you wish.
- Page 20 paragraph 5 – could you change the wording slightly as we are the EST Equality Support Unit not Welsh Government's.
- Page 20 (paragraphs 5 & 6) - Paragraph 5 refers to an engagement process of Welsh Government with the Equality Support Unit. Two things in relation to this statement which might just be our interpretation of wording used but thought worth mentioning. Our role in ESU is to provide advice and assistance to colleagues and teams within our own department. Crucially the real engagements on equality related issues should be with people in the 9 protected groups identified in the Equality Act 2010 not with ESU. The next paragraph (6) on page 20 states that "other stakeholders, organisations and individuals, including the general public will be consulted in the EqIA report. It would make the document stronger if here it made it clear that we will be specifically consulting people in the protected groups as opposed to more general group titles like stakeholders, or general public. I'm sure this is understood but thought it a point worth making in conjunction with the main issue on consultation above.
- Page 21 of the Scoping Report contains a list of reading and source information you have identified. Where teams undertake an EqIA we normally recommend that they undertake an official research request via the Welsh Government Library. That is a very thorough process and helps ensure that

any existing evidence and research is collected and considered. That research is meant to form the starting point for the reading and evidence for EqIA. I understand that in this case your team have employed an external consultancy firm to undertake the work including the research and evidence gathering and they have come up with this list. I have attached below the link to the Welsh Government Search request which you still might wish to consider undertaking to enhance the research sources and if you do so we will be happy to advise on this process. To assist I have also attached other links to internal web pages and documents that we normally send to teams undertaking EqIA's, some of which I discussed with . This includes the WG Strategic Equality Plan and links to guidance and training on the UN Rights of the Child legislation adopted by the Welsh Government. I have also attached the WG link to the guidance on the Welsh Language Measure which we were pleased to see was another consideration already built into your process.

- Page 22 Paragraph 3, there is a reference to “remedy significant adverse health impacts”. It would be good if you could explain how you are making the connection between health and the protected characteristics set out in the Equality Act 2010.

Link to Welsh Governments Library Research Request Form (under “Other Library Services – Literature Search Request”

<http://intranet/English/Services/KnowledgeAnalyticalServices/prodserv/servreqform/Pages/Welcome.aspx>

<<Copy of Duties and Protected Characteristics.xls>>

Link to Welsh Government Equality Impact Assessment Guidance, Template and link to existing examples of EqIA's

<http://intranet/English/PolicyDelivery/AppraisingPolicy/EqualityDiversity/Pages/EqualityImpactAssessments.aspx>

Link to Welsh Government Strategic Equality Plan

<http://wales.gov.uk/topics/equality/equalityactatwork/?skip=1&lang=en>

Link to Welsh Governments Rights of the Child online Training

<http://intranet/English/People/Learning/ProgrammeLearning/OtherLearning/Pages/UNCRC.aspx>

Link to the Welsh Government Rights of the Child FAQ's & Guidance

[http://intranet/English/AboutUs/OurStructure/LGC/Departments/CTP/Pages/RightsOfChildrenandYoungPerson's\(Wales\)FAQ's.aspx](http://intranet/English/AboutUs/OurStructure/LGC/Departments/CTP/Pages/RightsOfChildrenandYoungPerson's(Wales)FAQ's.aspx)

Link to Welsh Government Welsh Language Measure Guidance

<http://intranet/English/AboutUs/OurStructure/Business/StratDGOT/DGOT/EqualDiv/Pages/Welshguidance.aspx>

As you will be aware all documentation including things like this email will form evidence of the departments work on Equality. We recommend that all teams in EST have their own area of I-Share where they save all Equality work undertaken including emails, documents and consultation feedback.

You will probably have questions from these comments and we would be happy to discuss anything in person if it would help.

Regards/Cofion

## A2 Welsh Government Fairer Futures Division

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Good morning ,

Really I would just wish to support points expressed and really re-iterate the points he has made, especially regarding consultation and engagement. The consultation must be undertaken with people with protected characteristics throughout the entire process, and they must be included in all engagement processes, whether it is engagement events, written consultation etc. The need to engage with protected groups, does mean accessibility issues must be considered, to ensure that all protected groups are being given the opportunity to respond and participate. (e.g. written consultations may not be accessible for everyone). Perhaps on page 20 if you were able to change the doc, you may want to reflect this through amending the first line of Para 6 to read >> 'Other stakeholders, organisations and individuals, including the general public, will be consulted on the EqIA Report, with a commitment to engaging with protected groups'

In the consultation process, not only should protected groups be involved, but it may also be worth considering how you gain views on equality impacts through questioning etc. Is there potential for actual questions to be asked surrounding what people perceive impacts or equality issues might be on the protected characteristics within the other consultation questions? This will allow you not only to get individuals current personal experiences to be captured, but may allow you to obtain what each planned policy would mean for people if it was fully implemented etc. If respondents were to say they could not foresee any equality issues arising, you would still have evidence of individual protected groups through your engagement with them.

I think it is also important that you really make clear that the equality impacts you want considered are for all outcomes and for everyone's position. What I mean here is that you need to be able to consider the equality impact on: those who use the M4; those who dwell in communities alongside the new proposed routes; those who dwell in communities on the current route and the impact of the shift on them etc. As such, there may be conflicting impacts on the same protected groups. I know you will have already thought of this, but I just wanted to add that if you were going to ask questions on the equality impacts, within the actual policy questions of the consultation, it needs to be clear that you want impacts considered for each of these groups and not just the impact of the improved road service etc.

With regards the Welsh Governments EIA template and guidance, as mentioned, the template is just a suggestion. You may well find it easier to report and undertake your EIA in a different format, which is completely acceptable. But it is good the provided template has been looked at in the first instance, as it does provide a good breakdown of who you need to consider when thinking of people with protected groups. For example, it asks for impacts on the different types of disability for which impacts will be quite different, rather than disability in general. As such, it should hopefully provide you with a good starting point of thinking how you report.

As I mentioned above, if you are going to change the wording of this doc, I would also consider amending pg 18 para 4 to the WELSH Government's Fairer Future Division (also in para 3 of page 22)

Another possible source that may be of use is the Understanding the Travel Needs of London's Diverse Community report 2012. Whilst it does have a heavy focus on public transport, it does provide some information on barriers faced for protected groups that may be of use etc.

You may also wish to consider reporting on socio-economic impacts within the assessment or separately (apologies if this is already in hand). Whilst socio-economic impacts are different to equality impacts, in many cases, people belonging to certain protected groups often belong to specific socio-economic groups, and it can be worthwhile considering this.

I hope this is of help. We are happy to provide further contact details and work with you on this as you go through the process.

Many thanks and kindest regards,

## **A3**    **Natural Resources Wales**

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Mr Martin Bates  
Project Director, Infrastructure Projects  
Unit  
Department for Economy, Science and  
Transport  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

Ein cyf / Our ref: C.33.04.01/JP  
Eich cyf / Your ref: 13/0663

20 August 2013

By email: [martin.bates@wales.gsi.gov.uk](mailto:martin.bates@wales.gsi.gov.uk)

Dear Martin

**M4 CORRIDOR AROUND NEWPORT – RESPONSE FROM NATURAL  
RESOURCES WALES ON HEALTH IMPACTS ASSESSMENT AND EQUALITY  
IMPACTS ASSESSMENT**

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 9 July 2013. This response is in relation to the Health Impacts Assessment and Equality Impacts Assessment only. Our comments with respect to the scoping report for a Strategic Environmental Assessment have been made in a separate response from our functionally separate unit the Strategic Assessment Team.

*Natural Resources Wales brings together the work of the Countryside Council for Wales, Environment Agency Wales and Forestry Commission Wales, as well as some functions of Welsh Government. Our purpose is to ensure that the natural resources of Wales are sustainably maintained, used and enhanced, now and in the future.*

**Health Impacts Assessment Scoping Report**

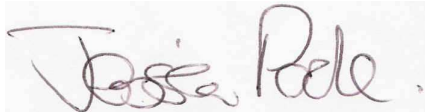
Considerations of health in this context are not within the remit of Natural Resources Wales and we therefore have no comments to make on the scoping report for the Health Impact Assessment.



## **Equality Impacts Assessment Scoping Report**

Similarly, Natural Resources Wales will not be providing comment on the Equality Impacts Assessment scoping report.

**Yours sincerely**



**Jessica Poole**  
**Team Leader**  
**Cardiff and Newport District Team**

cc Simon Power, ARUP ([simon-j.power@arup.com](mailto:simon-j.power@arup.com))