Welsh Government

M4 Corridor Around Newport
The Plan
Equality Impact Assessment

July 2014
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Glossary

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

| Adopted Plan | This is the Welsh Government’s adopted strategy to solve transport related problems affecting the M4 Corridor around Newport in South Wales – a new section of motorway between Magor and Castleton to the south of Newport and complementary measures:
| Reclassification of the existing motorway between Magor and Castleton – as a trunk road could enable traffic management, safety and revised access arrangements;
| A connection between the M4, M48 and B4245 – would provide relief to Junction 23A and to the local road network. It would also provide improved access to proposed park and ride facilities at Severn Tunnel Junction;
| 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; and
| 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 |

| 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 |

| Black Route | The Black Route and its complementary measures form the Welsh Government’s preferred strategy to address transport related problems on the M4 Corridor around Newport. This comprises the construction of a new three-lane section of motorway mainly following the protected TR111 ‘Black Route’, between Junctions 23 and 29 (Magor to Castleton), including a new crossing of the River Usk south of Newport. 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 |
| Complementary Measures (of the Plan) | In addition to the highway infrastructure options outlined in the Plan, there are additional complementary measures that could assist in alleviating travel related problems on the M4 Corridor around Newport:  
- Re-classify existing M4 between Magor and Castleton;  
- M4 / M48 / B4245 Connection;  
- Provide cycle friendly infrastructure; and  
- Provide walking friendly infrastructure |
| Consultation Participation Report | Once the draft Plan Consultation ended, all responses were collated, analysed and considered. A Participation Report has been prepared, which summarises the responses to the engagement and consultation process. The responses have helped the Welsh Government to review and finalise the associated assessments |
| DfT | Department for Transport. It works to support the UK transport network and plans and invests in transport infrastructure and services. It should be noted that highways are a devolved function, which is dealt with autonomously by the Welsh Government |
| Do Minimum / Do Minimum Scenario | 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, the Variable Speed Limit system and the Steelworks Access Road (A4810)) and any committed schemes (such as the Junction 28/Bassaleg Roundabout/Pont Ebbw Roundabout improvement) |
| draft Plan | The Welsh Government initially outlined its preferred strategy to solve transport related problems affecting the M4 Corridor around Newport in South Wales in its draft Plan published in September 2013. This was published for public consultation, alongside associated environmental, health and equality assessments of the draft Plan, which compared it to two Reasonable Alternatives, as well as a Do Minimum scenario |
| Existing M4 | The term ‘existing M4’ or ‘existing motorway’ is used to define the M4 around Newport, J23 to J29 (Magor to Castleton) |
| HIA | Health Impact Assessment. A process that considers how the health and well-being of a population may be affected by a proposed action, be it a policy, programme, plan or a change to the organisation or delivery of a particular public service. HIA is a mandatory requirement of transport appraisal.  
A HIA Report formed part of the draft Plan Consultation and has been updated to take into account comments received from the Wales Health Impact Assessment Support Unit (WHIASU) and others.  
A strategy level HIA is published alongside the Plan for the M4 Corridor around Newport |
| Junction Strategy | A Junction Strategy would be developed at a scheme level of appraisal to inform a Preferred Route.  
For the M4 Corridor around Newport, this would consider alignment options in the vicinity of Newport Docks, as well as potential arrangements at Magor and Castleton if the existing M4 is reclassified |
<p>| LGB | Lesbian, gay and bisexual |</p>
<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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<tbody>
<tr>
<td>LSOA</td>
<td>Lower Super Output Area. An Office for National Statistics defined geography containing between 1,000 and 3,000 people</td>
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<tr>
<td>M4 CEM</td>
<td>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</td>
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<tr>
<td>M4 Corridor around Newport</td>
<td>The M4 Corridor around Newport is the term used to brand the current Welsh Government’s work on its preferred strategy to address transport related problems on the M4 Corridor around Newport</td>
</tr>
<tr>
<td>NAPPAs</td>
<td>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. NAPPAs have been superseded by ‘Priority Areas’ in the ‘Welsh Government Noise Action Plan’; published 2013. Relevant extant documents make reference to NAPPAs; consequently, the term NAPPA is used within this document in preference to Priority Area</td>
</tr>
<tr>
<td>Preferred Route</td>
<td>The Welsh Government may decide to announce a Preferred Route for the main element of the Plan, a new section of motorway to the south of Newport, which would protect the corridor for planning purposes</td>
</tr>
<tr>
<td>Preferred Strategy</td>
<td>The Welsh Government’s preferred strategy is a package of measures aimed at achieving identified objectives and addressing transport related problems affecting the M4 Corridor around Newport in South Wales. The Welsh Government has published its preferred strategy within its Plan for the M4 Corridor around Newport. When implemented, the Plan will lead to a new three–lane section of motorway being built to the south of Newport, alongside some complementary measures that include highway management, walking and cycling initiatives</td>
</tr>
<tr>
<td>Reasonable Alternatives</td>
<td>Reasonable Alternatives were presented as part of the draft Plan, being other options that the Welsh Government considers could solve the transport related problems affecting the M4 Corridor around Newport in South Wales. The Reasonable Alternatives were outlined in the draft Plan, and included 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</td>
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<tr>
<td>Reclassification</td>
<td>The Plan’s proposed complementary measures would lead to the existing M4 between Magor and Castleton being reclassified as a trunk road, if a new section of motorway is built to the south of Newport. Reclassifying the existing motorway as a trunk road could enable traffic management, safety and revised access measures</td>
</tr>
<tr>
<td>SAC</td>
<td>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)</td>
</tr>
<tr>
<td>Scheme / Project</td>
<td>For individual schemes or projects, the appropriate level of appraisal is more detailed, quantitative and evidence- based. The proposed new section of motorway that forms the main element of the Plan, at a strategy level of detail, will now be progressed as a scheme / project</td>
</tr>
<tr>
<td>SEA</td>
<td>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</td>
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<tr>
<td>SDR</td>
<td>Southern Distributor Road. In this case, the A48 Southern Distributor Road, Newport</td>
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<tr>
<td>SHRA</td>
<td>Strategic Habitats Regulation Assessment. A process that considers the potential effects of plans and programmes on European sites (protected habitats). A document ‘Consideration of the Options for the M4 Corridor around Newport in relation to the requirements of the Habitats Regulations’ formed part of the draft Plan Consultation. A Strategic Habitats Regulations Assessment has been prepared that takes into account comments from Natural Resources Wales, and other, and is published alongside the Plan for the M4 Corridor around Newport.</td>
</tr>
<tr>
<td>Strategy, Plan or Programme</td>
<td>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. The Welsh Government’s preferred strategy to address transport related problems on the M4 Corridor around Newport is outlined in its Plan.</td>
</tr>
<tr>
<td>TEN-T</td>
<td>Trans-European Transport Network</td>
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<tr>
<td>TPOs</td>
<td>Transport Planning Objectives</td>
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<tr>
<td>TR111</td>
<td>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</td>
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<tr>
<td>UNCRC</td>
<td>United Nations Convention on the Rights of the Child</td>
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<tr>
<td>WelTAG</td>
<td>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</td>
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Non-Technical Executive Summary

This section of the report provides a non-technical summary of the Equality Impact Assessment (EqIA) of the M4 Corridor around Newport Plan.

The Welsh Government’s preferred strategy to solving transport related problems on the M4 Corridor around Newport was published in its draft Plan in September 2013. The Plan has been developed taking into account the extensive work undertaken on the draft Plan, which built on the results of the M4 Corridor Enhancement Measures (CEM) Programme and other relevant development work that has been undertaken since the 1990s1.

The Welsh Government’s preferred strategy for the M4 Corridor around Newport comprises a new three-lane section of motorway being built between Junctions 23 and 29 south of Newport, alongside complementary highway, walking and cycling measures.

The Plan will lead to the construction of a new three-lane section of motorway to the south of Newport, mainly following a ‘Black Route’, between Magor and Castleton, including a new crossing of the River Usk. A junction strategy will be investigated as part of scheme design. In addition to the new highway infrastructure, the Welsh Government recognises that there are additional complementary measures that could assist in alleviating travel related problems around Newport. The Plan’s complementary measures include:

- **Re-classify existing M4 between Magor and Castleton**
  Re-classification of the existing motorway as a trunk road could enable traffic management, safety and revised access arrangements.

- **M4 / M48 / B4245 connection**
  A connection between the M4, M48 and B4245 would provide relief to Junction 23A and to the local road network. It would also provide improved access to proposed park and ride facilities at Severn Tunnel Junction.

- **Provide cycle friendly infrastructure**
  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.

- **Provide walking friendly infrastructure**
  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 details of the complementary measures will be developed as part of scheme development.

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1 See [www.m4newport.com](http://www.m4newport.com) and [www.m4cem.com](http://www.m4cem.com) for more information
Equality context

The population and equality status in Newport are considered in various strategies as outlined in Section 5 of this report. In summary:

- In 2011, the population of Newport was 145,736 which is a 6.4% rise from the 2001 figure. The population of Newport in 2011 was 51% female and 49% male.\(^2\)
- The proportion of the Newport population aged over 65 in 2011 was 16.1% which is slightly lower than the proportion for Wales as a whole, which was 18.3%. The proportion of children aged 0-15 years old in Newport was 20.2%, which is a higher proportion than at a Wales level (16.1% in 2011)\(^3\);
- In 2011, 89.9% of Newport’s population were from a white background and 10.1% of people were from a non-white background. Newport has the second largest number of people from a non-white background in Wales, second to Cardiff only. This equates to Newport having a higher proportion of people from a non-white background than for Wales as a whole (Newport 10.1%, Wales 4.3% in 2011)\(^4\).

During the public consultation, information about respondents was sought via the consultation response forms and consultation website. This sought information on the travel habits of respondents, as well as their age, sex and nationality. In summary, respondents generally are frequent users of the M4 around Newport; generally use the M4 around Newport for work or leisure trips; were generally over 40 years of age; are mostly male and identify themselves as British.

Equality Impact Assessment

Welsh Transport Planning and Appraisal Guidance (WelTAG) provides the context for the transport appraisal of equality, diversity and human rights. It states that the Welsh Government will ensure that all demographic groups should have access to transport services. As a result, the Welsh Government has undertaken EqIA as part of the development of the M4 Corridor around Newport Plan. **EqIA is an iterative process and further consideration of the potential impacts on equality, diversity and human rights may be required as schemes are progressed from the Plan,** in order to avoid, reduce and, if possible, remedy any identified adverse impacts on all demographic groups.

The draft Plan and its associated EqIA underwent a period of consultation from 23 September to 16 December 2013. In total 1,816 unique formal responses to the consultation were received. Comments on the EqIA are summarised below:

- Some respondents found the draft Plan EqIA satisfactory, remarking that it was thorough, covered all impacts and its conclusions are accurate;
- Several respondents highlighted the draft Plan EqIA’s finding that the Black Route option would have a positive impact, while taking no action would have a negative impact on equality;
- Some stakeholders were critical of the assessment, with some suggesting it was weak, incorrect or inadequate;
- Many stakeholders express concerns regarding the impacts road developments could have on equality within the local community;

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\(^2\) Office for National Statistics, Census 2001 & Census 2011
\(^3\) Office for National Statistics, Census 2011
\(^4\) Office for National Statistics, Census 2011
• Some stakeholders raise concerns about the changes in car usage the proposals may have, with several suggesting it would make Newport and its residents more dependent on cars;
• A small number of respondents stated that the assessment should be redone in order to include additional alternatives; and
• Many respondents stated that they do not believe equality considerations are relevant to a project such as this and that the assessment is a bureaucratic exercise.

An Equality Impact Assessment workshop was undertaken with the Minority Ethnic Communities Health Association for Newport: Initiating Change (MECHANIC). Attendees were considered by the Welsh Government to represent relevant and appropriate organisations to help shape the EqIA. Comments received included:

• No objection was received on the methodology or approach to the EqIA;
• A new section of motorway will be positive for the economy and regeneration of Newport as long as there is a suitable junction strategy that provides access to key employment areas; and
• There should be at least one junction to increase accessibility from the south of Newport.

**Appraisal**

The assessment of the Plan and Do Minimum Scenario (doing nothing above what is already planned or committed) is provided in Section 5.5 of this report.

In summary the Plan would be expected to provide positive impacts on the population and equality, whereas without the Plan the current situation would worsen.

Appraisal of the Plan outlines:

• The Plan would lead to a reduction in traffic congestion, improved resilience, transport safety and journey time reliability. This would bring benefits to people with access to a car. The Plan would improve access to services and facilities (e.g. education and healthcare) as well as employment opportunities primarily for those of working age. Complementary measures would provide improved walking and cycling connections which could provide benefits to people of all ages. They would also bring health benefits to people of all ages through promoting walking and cycling locally;
• The Plan would bring benefits to those with a disability who have access to a car, making both local and regional trips more accessible. The new section of motorway would be unlikely to benefit those without access to a car however the complementary measures could bring benefits to those with a disability and without access to a car if walking and cycling links are built with ‘access for all’ in mind;
• The new section of motorway and its complementary measures would also be designed to improve transport safety and personal security. This would bring benefits to all groups of people in terms of providing improved safe access to support services, facilities and employment opportunities;
• The Plan would bring reduced traffic congestion improved resilience, transport safety and journey time reliability. This would bring direct benefit to married couples and those in civil partnership, improving accessibility to employment opportunities, services and facilities;
• The Plan would benefit those with access to a car, improving accessibility to key facilities and services (e.g. health care and support groups). The complementary measures would improve accessibility to services and facilities that may be relied upon during pregnancy...
and maternity. The new section of motorway is aligned away from the main area of residential properties. The Plan would help reduce the exposure of pregnant women to air pollution associated with traffic;

- The Plan aims to provide economic benefits and support the regeneration of Newport. The junction strategy will aim to provide opportunities for economic development and complement public transport access to key employment sites. This would particularly benefit adults from minority ethnic groups who may be on low incomes or who have problems accessing employment opportunities with or without private vehicles. The construction of the scheme is likely to attract many travellers groups during works, as they generally seek this type of work. However sufficient facilities would need to be provided during their temporary residence;

- The Plan would bring specific positive impacts with increased accessibility for Somali Muslims who predominately travel from Newport to Cardiff to worship;

- The Plan would benefit both male and female drivers, improving access to employment as well as facilities and services. The complementary measures will complement public transport services, improve walking and cycling infrastructure and improve access to the north of Newport. This will offer a positive benefit to women who are more dependent on public transport services;

- The Plan will benefit access to employment as well as facilities and services. The complementary measures will offer a positive benefit for lesbian, gay and bi-sexual (LGB) people. However safety concerns on the road network, existing walking and cycling infrastructure would remain or even worsen. This would have a particular impact on the personal security of LGB community;

- The impact on Welsh language is considered to be limited;

- The 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, contributing to increased economic activity and supporting the regeneration of Newport. The junction strategy will aim to provide increased opportunities for economic development and accessibility to existing and future employment sites by all car and public transport.

Appraisal of the Do Minimum Scenario outlines that:

- Traffic forecasting suggests that the problems will continue to worsen and several operational problems will be experienced on all sections of the M4 around Newport in the longer term;

- The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway, which would impact adversely on journey times and journey time reliability. Continued congestion would impact on people of all ages particularly in access to services and severe operational problems of the motorway;

- Continuing congestion on the motorway would impact negatively on those with a disability who are car users, by reducing access to services, facilities and employment opportunities. Diversion of traffic to local roads, particularly during peak times, would impact on disabled people who do not have access to a car;

- The Do Minimum scenario would impact negatively on all those wishing to access support services, facilities and employment opportunities by car. It would also impact on those reliant on alternative transport modes, particularly during peak periods;

- Safety concerns on the road network, on existing walking and cycling links, and on public transport would also remain or even worsen; and
Air quality and noise pollution problems would also continue to worsen along the existing motorway, impacting on people living and working in urban centres of Newport and to pregnant women exposed to associated air pollution.

A comparison of the Plan and the Do Minimum appraisal is shown below:

<table>
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<tr>
<th>Equalities and WeITAG Criteria</th>
<th>The Plan</th>
<th>Do Minimum Scenario</th>
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<tbody>
<tr>
<td>Age</td>
<td>(+)</td>
<td>(-)</td>
</tr>
<tr>
<td>Disability: physical, sensory or mental</td>
<td>(+)</td>
<td>(-)</td>
</tr>
<tr>
<td>Gender Reassignment</td>
<td>(+)</td>
<td>(-)</td>
</tr>
<tr>
<td>Marriage and Civil Partnership</td>
<td>(+)</td>
<td>(-)</td>
</tr>
<tr>
<td>Pregnancy and maternity</td>
<td>(+)</td>
<td>(-)</td>
</tr>
<tr>
<td>Race</td>
<td>(+)</td>
<td>(-)</td>
</tr>
<tr>
<td>Religion and Belief</td>
<td>(+)</td>
<td>(-)</td>
</tr>
<tr>
<td>Sex</td>
<td>(+)</td>
<td>(-)</td>
</tr>
<tr>
<td>Sexual orientation</td>
<td>(+)</td>
<td>(-)</td>
</tr>
<tr>
<td>Welsh language</td>
<td>(0)</td>
<td>(0)</td>
</tr>
<tr>
<td>Other: Lone parent, economic inactivity, social and multiple deprivation</td>
<td>(++)</td>
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**Action Plan**

Section 6 of this report outlines potential actions that the Welsh Government will consider as part of the Plan and its progression, to ensure that the results of this EqIA are taken into account and monitored appropriately. The actions include:

- Ensure that public transport facilities are designed to be safe and accessible to all;
- 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;
- Appropriate diversion to any highway or pedestrian/cycle/equestrian route should be made, if required, during construction works that might obstruct an existing route;
- Appropriate measures should be introduced to maintain or enhance any highway or pedestrian/cycle/equestrian route, if appropriate;
- Identify opportunities to address cultural needs as part of the scheme development;
- Enhance accessibility to places that promote cultural and historical identity;
- Ensure clear and appropriate signage and information services are displayed at public transport interchanges and along road routes;
- Ensure new junctions are designed to accommodate pedestrians and cyclists;
- Offer appropriate compensation for properties requiring demolition, including replacement of any community facilities;
- Ensure the recruitment and training of women and equality groups during construction and maintenance activities; and
- Prepare a Monitoring and Evaluation Plan.
The remaining sections of this report provide the full Equality Impact Assessment of the M4 Corridor around Newport Plan.
1 Introduction

This Equality Impact Assessment (EqIA) has been prepared in support of the M4 Corridor around Newport Plan, the Welsh Government’s adopted strategy to solving transport related problems around Newport.

The Plan has been developed taking into account the extensive work undertaken as part of the M4 Corridor Enhancement Measures (CEM) Programme and the M4 Corridor around Newport draft Plan. This HIA for the Plan builds upon the results of the M4 CEM and draft Plan HIAs. These are available to view at www.m4cem.com and www.m4newport.com respectively.

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 Welsh Government’s preferred strategy was published in its draft Plan in September 2013, and in recognising the range of the objectives for the M4 Corridor around Newport, the Welsh Government intends to adopt a Plan for the M4 Corridor around Newport, which combines both highway infrastructure and other demand management solutions in identifying its preferred strategy.

The Welsh Government’s preferred strategy for the M4 Corridor around Newport consists of:

- A new three-lane section of motorway between Magor and Castleton to the south of Newport along the TR111 protected corridor of the Black Route; and
- Complementary Measures (see table 1).

The Welsh Government’s preferred strategy comprises the construction of a new three-lane section of 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 the 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.

On adoption of the Plan a junction strategy would be investigated as part of the scheme’s development.

In addition to the new highway infrastructure, the Welsh Government recognises that there are additional complementary measures that could assist in alleviating travel related problems within the M4 Corridor around Newport. The Plan’s complementary measures are as shown in Table 1.

The location of the M4 Corridor around Newport is shown in its strategic context in Figure 1 and the alignment of the Black Route is shown in the context of local constraints in Figure 2.

### Table 1 Complementary Measures

<table>
<thead>
<tr>
<th>Complementary Measure</th>
<th>Description</th>
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<tbody>
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<td>Re-classify existing M4 between Magor and Castleton</td>
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<tr>
<td>Provide cycle friendly infrastructure</td>
<td>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.</td>
</tr>
<tr>
<td>Provide walking friendly infrastructure</td>
<td>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.</td>
</tr>
</tbody>
</table>

The details of the above complementary measures will be developed as part of scheme development. They aim to maximise opportunities to complement the regional transport system, including proposals for the Cardiff Capital Region Metro.

Alongside this EqIA the Welsh Government has also prepared the following associated assessments, which consider the potential environmental and health impacts of the Plan and the Do Minimum scenario:

- Health Impact Assessment (HIA);
- Strategic Environmental Assessment (SEA); and
- Strategic Habitats Regulations Assessment (SHRA).

A Consultation Participation Report has also been produced, which summarises the engagement and consultation process undertaken.
1.1 Purpose

This document provides the EqIA in support of the Plan.

In accordance with the Equality Act 2010, as a strategy or programme, the Welsh Government considers that an EqIA of the M4 Corridor around Newport Plan is required. This EqIA assesses to what extent the Plan for the M4 Corridor around Newport could 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 and prepared with due regard to the guidance provided in Welsh Transport Planning and Appraisal Guidance (WelTAG), the National Transport Plan Equality Impact Assessment (February 2010), the Wales Transport Strategy Equality Impact Assessment (2008) and Working for Equality in Wales (May 2010). The assessment also reflects the Welsh Governments objectives outlined in its Strategic Equality Plan.

The Welsh Government’s Equality Support Unit within the department of Economy, Transport and Science, as well as the Welsh Government’s wider Equality and Diversity Department (Fairer Futures), was consulted on the proposed scope of the EqIA and provided advice on the preparation of the EqIA. The responses received as part of the scoping exercise have been incorporated into this assessment of the Plan along with comments received during the draft Plan public consultation which ran for a period of 12 weeks between September and December 2013.

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.

The M4 is critical to the Welsh economy. Cardiff, 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.

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6 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.
7 National Transport Plan Equality Impact Assessment and Equality Action Plan, February 2010
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. These issues are worse at times of peak travel and have worsened as the number of users on the network has increased.
Figure 1 Location and Strategic Importance of the M4 around Newport, Magor to Castleton
Figure 2  Black Route shown within the local study area and main constraints around Newport
2 Problems, Aims and Objectives

These problems, aims and objectives and aims of the Plan were subject to dialogue during the early stages of the engagement process, with public and stakeholders.

Seventeen problems are identified; which encompass issues of capacity, network resilience, safety and sustainable development.

Three aims are identified as part of a wider transport strategy for South East Wales.

Fifteen objectives are identified and each one aims to address one or more of the problems.

2.1 Problems on the M4 Corridor around Newport

The 17 identified transport related problems are listed below.

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\(^{11}\).
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.

2.2 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 objectives to reduce greenhouse gas emissions and to making Wales more resilient to the effects of climate change.

This 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\(^{12}\).

\(^{11}\) 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.

2.3 Objectives of the M4 Corridor around Newport

The Welsh Government, with the help of the others, identified 15 objectives for the M4 Corridor around Newport. These objectives aim to address the identified transport related problems listed in section 2.2. For clarity objectives are referred to as “Transport Planning Objectives” (TPOs) in WelTAG (see Glossary).

The 15 objectives (listed below) have provided a framework in which to appraise the relative performance at a strategic level Plan and the Do Minimum scenario.

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.
3 Previous Equality Impact Assessment

This EqIA has been prepared in order to support the Welsh Government in their decision to adopt the Plan for the M4 Corridor around Newport. Prior to this EqIA, a great deal of previous EqIA work has been undertaken as follows:

- Consultation and EqIA as part of the M4 CEM Programme; and
- Consultation and EqIA as part of the M4 Corridor around Newport draft Plan.

This previous work has included dialogue and deliberative sessions both with internal and external specialists and expert stakeholders, including Welsh Government equality departments, local service boards and other organisations with an interest in the likely equality and community impacts of transport measures associated with the M4 Corridor around Newport. This input has helped to influence the development of the Plan.

The Equality and Human Rights Division of the Welsh Government was consulted on the proposed scope of the EqIA for the M4 Corridor Enhancement Measures (CEM) programme. However a formal response to the scoping request was not received. As a result, the preliminary EqIA was prepared with due regard to guidance provided in WelTAG, the National Transport Plan Equality Impact Assessment (February 2010)\(^{13}\), the Wales Transport Strategy Equality Impact Assessment (2008)\(^{14}\) and Working for Equality in Wales (May 2010)\(^{15}\).

A scoping report was prepared in relation to draft Plan 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. The departments provided a response to the scoping and this outlined the Welsh Government’s proposed approach to undertaking EqIA.

As part of the M4 Corridor around Newport draft Plan consultation, an Equality Impact Assessment workshop was undertaken with the Minority Ethnic Communities Health Association for Newport: Initiating Change (MECHANIC) and invited stakeholders, on 10 December 2013. This was organised by MECHANIC and those invited were considered to represent relevant and appropriate organisations to help shape the EqIA for the draft Plan. Attendees present at the workshop are listed in Table 2.

<table>
<thead>
<tr>
<th>Attendees</th>
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<tbody>
<tr>
<td>SEWREC (South East Wales Regional Equality Council)</td>
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<tr>
<td>Public Health Wales Screening Services</td>
</tr>
<tr>
<td>Kaleidoscope Project/The Voice</td>
</tr>
<tr>
<td>Learning Disabilities Health Liaison Nurse Team, Aneurin Bevan Health Board</td>
</tr>
<tr>
<td>Senior Public Health Practitioner Public Health Wales</td>
</tr>
<tr>
<td>Fairer Futures, Welsh Government</td>
</tr>
<tr>
<td>Student, University of South Wales</td>
</tr>
<tr>
<td>Chair of MECHANIC and Principal Public Health Practitioner, Public Health Wales</td>
</tr>
</tbody>
</table>

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13 National Transport Plan Equality Impact Assessment and Equality Action Plan, February 2010
A presentation was given outlining the background of the M4 Corridor around Newport draft Plan, how it built on work undertaken for the M4 CEM Programme, and the draft Plan Consultation process. The attendees were then taken through the adopted EqIA methodology, appraisal criteria and assessment of the draft Plan, its Reasonable Alternatives and the Do Minimum Scenario.

Two tasks were undertaken during the workshop which provided attendees with the opportunity to provide comment on:

1. The methodology adopted to undertake the EqIA; and
2. The appraisal undertaken.

Wider comments and questions were also taken on wider issues associated with the draft Plan and its appraisal.

In addition to the EqIA workshop, as part of the M4 Corridor around Newport draft Plan consultation, a number of telephone interviews were undertaken with key stakeholders on 12 November 2013. Those interviewed were considered by the Welsh Government to represent relevant and appropriate organisations to help shape the EqIA for the draft Plan. Interviewees are listed in Table 3.

### Table 3 M4 Corridor around Newport draft Plan EqIA Telephone Interviewees

<table>
<thead>
<tr>
<th>Interviewees</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy and Public Affairs Manager, Chwarae Teg- Women and Workplace Innovation</td>
</tr>
<tr>
<td>Policy Advisor, Age Cymru</td>
</tr>
<tr>
<td>Fairer Futures, Welsh Government</td>
</tr>
</tbody>
</table>

The comments received during both the M4 CEM Programme and the draft Plan consultation has informed the development of, and EqIA of, the Plan.
4 Equality Impact Assessment

4.1 Transport and Equality Impact Assessment

The Welsh Government is committed to improving the lives of the people in Wales and to achieving best practice in equality and human rights. This forms a central principle of the Wales Transport Strategy.16 It is important, therefore, that transport encompasses those social, economic and environmental interactions17.

WelTAG provides the context for the transport appraisal of equality, diversity and human rights. It states that the Welsh Government will ensure that all demographic groups should have access to 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 Unit18, 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 FIA Foundation19. 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;
- 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.

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16 One Wales Connecting the Nation. The Wales Transport Strategy, 2008
17 National Transport Plan Equality Impact Assessment and Equality Action Plan, February 2010
4.2 What is an Equality Impact Assessment?

The National Transport Plan EqIA describes an EqIA 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 objectives.

The Welsh Government has specific and general duties in relation to equality and human rights\(^{20}\). The legislative framework for equality and human rights comprises:

- 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.”
- 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\(^{21}\).

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; and
- 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; and
- To take steps to meet disabled people’s needs, even if that requires more favourable treatment.

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

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\(^{21}\) http://wales.gov.uk/topics/equality/equalityactatwork/equalityact10/?lang=en
5 EqIA Scoping and Consultation

5.1 EqIA Scoping

WelTAG states that the Welsh Government has a statutory duty to promote equality through their strategic policies and that all transport proposals seeking public funding and/or approval of the Welsh Government must take account of differing needs and their equality impacts. As a result, the Welsh Government acknowledges that EqIA is required for the M4 Corridor around Newport Plan.

This EqIA has been developed to be proportionate to the strategic level of the Plan. As such, the appropriate level of appraisal is broad and at a strategy level. It may only be possible to undertake appraisal qualitatively.

EqIA is an iterative process. This document forms a high level appraisal of the Plan against the Do Minimum scenario (doing nothing above what is already planned or committed). Further EqIA may be required as the Plan moves to the scheme level in order to avoid, reduce and, if possible, remedy any potential significant adverse impacts.

The geographical extent of the EqIA specifically refers to the M4 Corridor around Newport.

WelTAG outlines that positive and negative impacts, particularly disproportionate impacts, arising from the strategy or scheme(s) should be qualitatively assessed against the equality impact groups. An assessment of the Plan and the Do Minimum scenario has therefore 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:

- 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 WelTAG:

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

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A scoping report was prepared in relation to the 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 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 relevant responses received as part of the scoping exercise have been incorporated into this assessment of the Plan.

5.2 Consultation on the draft Plan

The draft Plan underwent a period of consultation from 23 September to 16 December 2013. The Welsh Government’s consultation document provided an overview of the draft Plan, its Reasonable Alternatives and a Do Minimum scenario. In addition to the draft Plan consultation document, a number of environmental, health and equality based assessments of the draft Plan were produced, including an EqIA of the draft Plan.

Consultation documents and response forms were made available to the public at public events, Newport libraries, other Document Deposit Centres, and at the M4 Newport website www.m4newport.com.

In total, 1,816 unique formal responses to the consultation were received. In order to inform this EqIA, we have summarised relevant responses below. These have been presented as general comments made on the options of relevance to the EqIA and specific comments made in relation to the EqIA which accompanied the draft Plan.

A separate Participation Report has been produced that provides a summary of the engagement process and consultation responses received. This should be read in order to understand the wider consultation process.
5.3 Consultation responses to the draft Plan EqIA

5.3.1 Socio-economic data

During the consultation process, information about respondents was sought via the consultation response forms and consultation website. This sought information on the travel habits of respondents, as well as their age, sex and nationality.

Where respondents provided this information it has been used to help the Welsh Government’s analysis of the responses to the consultation, relevant to equality, diversity and social inclusion. The responses are summarised below.

Respondents were first asked how often they used the M4 motorway around Newport, and could only select one response. The results are shown in Figure 3.

**Figure 3: How often respondents use the M4 motorway around Newport**

Respondents were also asked for what purposes they generally used the M4 motorway around Newport for these journeys, and could only select one response. The results are shown in Figure 4.

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23 The graphs below only include respondents who completed a response form or sent their response on the consultation website. All other respondents, who did not provide responses about their travel habits, are excluded from these totals.

24 A number of respondents registered on the consultation website but did not submit a response to the consultation questions. Any demographic and travel habit data they provided in that initial registration process has been disregarded.
Figure 4 The purpose of respondent’s journeys

Respondents were asked to identify which age range they were at the time of completing their response, and could only select one response. The results are shown in Figure 5.

Figure 5 Age
Respondents were asked to identify their gender, and could only select one response. The results are shown in Figure 6.

**Figure 6 Gender**

![Gender Distribution Chart]

Respondents were also asked to identify their nationality, and could enter their response. The results are shown in Table 4.

**Table 4 Nationality**

<table>
<thead>
<tr>
<th>Nationality</th>
<th>Number of respondents</th>
</tr>
</thead>
<tbody>
<tr>
<td>British</td>
<td>525</td>
</tr>
<tr>
<td>English</td>
<td>51</td>
</tr>
<tr>
<td>Scottish</td>
<td>3</td>
</tr>
<tr>
<td>Welsh</td>
<td>236</td>
</tr>
<tr>
<td>Dutch</td>
<td>2</td>
</tr>
<tr>
<td>French</td>
<td>1</td>
</tr>
<tr>
<td>German</td>
<td>2</td>
</tr>
<tr>
<td>Greek</td>
<td>1</td>
</tr>
<tr>
<td>Irish</td>
<td>2</td>
</tr>
<tr>
<td>None</td>
<td>2</td>
</tr>
<tr>
<td>Undisclosed</td>
<td>62</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>887</strong></td>
</tr>
</tbody>
</table>
5.3.2 Analysis of representations from key stakeholders

A number of stakeholders commented on the draft Plan EqIA, in varying levels of detail. Most of these comments, including comments from transport organisations, environmental organisations, private sector, business and regeneration organisations and town and community councils, were critical of the assessment, with some suggesting it was weak, incorrect or inadequate. Several stakeholders give no statement of support or opposition to the draft Plan EqIA. A few stakeholders acknowledge the findings.

Some stakeholders criticised the draft Plan EqIA for not including alternatives to a new road in its assessment. They highlighted the importance of alternatives such as public transport improvements and the South East Wales Metro (currently known as the Cardiff Capital Region Metro) and suggested the lack of alternatives is a limitation of the assessment.

Several stakeholders were highly critical of the scoring, justifications and evidence used in the draft Plan EqIA. Sustrans Cymru disputed reference to possible improved journey times while CTC Cymru suggested the assessment makes unsubstantiated claims about possible economic opportunities.

Many stakeholders expressed concerns regarding the impacts road development could have on equality within the local community, suggesting individuals without access to a car would not benefit from the proposals.

CTC Cymru made a number of detailed comments regarding the draft Plan EqIA. They argued that the assessment was incorrect in suggesting that lack of access to a car is the main factor in the social exclusion of low income households, giving examples of European cities which have low car usage.

Some stakeholders, including CTC Cymru, Age Cymru and Friends of the Earth Cymru, raised concerns about the changes in car usage the proposals may have, with several stakeholders suggesting it would make Newport and its residents more dependent on cars. Some expressed concern that this would be detrimental to equality within the local community, as they believe a more car orientated city would result in the social exclusion of those without cars. Some stakeholders also believe the assessment of traffic levels in the EqIA is insufficient. Age Cymru suggested the assessment does not fully consider the possible impact on traffic levels in Newport city centre as well as the safety of pedestrians.

Age Cymru made reference to mitigating possible impacts on equality. They suggest that, if replacement community facilities are constructed as part of a compensation package, they should be located in the same area as previous facilities to ensure they are fully accessible by local people.

5.3.3 Analysis of representations from members of the public and other organisations

About ten respondents found the draft Plan EqIA satisfactory, remarking that it was thorough, covered all impacts and its conclusions were accurate.

Several respondents highlighted the draft Plan EqIA’s finding that the Black Route option would have a positive impact, while taking no action would have a negative impact on equality. A few respondents stated that they do not agree with the draft Plan EqIA’s conclusions. A few others stated that they do not think the assessment demonstrates the need for a new road.
Several respondents said that they found the assessment document too long and that it was hard to find the information they were looking for within it. One respondent requested a shorter non-technical summary version to be made available. In contrast, a few respondents found the document too brief and too vague. Where respondents were critical of the assessment they often challenged the assessment’s objectivity, suggesting that it was a subjective interpretation of the potential impacts, presented as fact and, accordingly, such processes could be manipulated to help secure a preferred outcome. Similarly, respondents argued that the assessment was prejudiced in favour of car transport, claiming that it works from the assumptions that not building a new road would have a negative impact and that car use would increase.

Another criticism from respondents was that the assessment only considered the options proposed in the consultation document. Some respondents considered this is too limited a scope, saying they would like to see a broader range of alternatives considered.

A small number of respondents stated that the assessment should be redone in order to include these additional alternatives.

Many respondents stated that they do not believe equality considerations are relevant to a project such as this and that the assessment is a bureaucratic exercise driven by what they regard as political correctness.

A few respondents discuss the different social groups identified within the assessment. One respondent was concerned about social exclusion and suggested that it would have been useful to characterise specific groups by the types of transport they typically use. Others stated that the assessment should have considered those people who are unable to drive, for example, due to medical conditions. One respondent suggested that the impacts on non-human life should also be included in the assessment.

5.4 EqIA Workshop

An EqIA Workshop was undertaken with the MECHANIC held on 10 December 2013 at Victoria House, Newport. Those who attended represent various organisations and individuals who are or work with minority ethnic groups to deliver a range of equality, health and education services (see Section 3 for more information). These were considered by the Welsh Government to represent relevant and appropriate organisations to help shape the EqIA of the current draft Plan to address transport related problems on the M4 Corridor around Newport.

The workshop sought to provide the opportunity to discuss and welcome comments on the M4 Corridor around Newport draft Plan EqIA, in terms of the adopted methodology, and assessment undertaken. A summary of the issues raised and discussed during the workshop is provided below:

- It was suggested that the workshop could help attendees finalise their responses to the public consultation, further to being issued copies and links to the consultation material before the meeting. It was suggested by the chair that the public consultation and the timing of the meeting afforded attendees with sufficient time to respond formally to the draft Plan consultation. The project team offered their support to any attendees who wished to respond to the consultation, and provided relevant direct contact details to those who requested them.
- The workshop attendees agreed that an appropriate group of representatives of protected characteristics with health and equality interests were present.
- No objection was received on the methodology or approach to EqIA.
• It was suggested that if journey times are improved and journey time reliability is increased, there will be less disruption to services. For example, many higher education students need to travel along the M4 to reach educational facilities, and the delays on the M4 often mean that they miss or are late for lessons. It was also discussed that access to healthcare services and business meetings would also be more reliable, which would provide efficiency savings.

• Concern was raised over the potential impact on the A48 Newport Southern Distributor Road (SDR) if a junction provided access onto this road. It was suggested that the A48 SDR is already congested at rush hour and would be subject to increased traffic congestion if traffic use increased. It was suggested that the A48 SDR should only be used as a distributor road and be a local accessibility route for travel in Newport. Should the new section of motorway reduce traffic on the A48 SDR, it was agreed that this would be of benefit to movement within Newport and improve journey times and journey time reliability to facilities and services.

• Attendees were keen to understand how pedestrian infrastructure and links to public transport would be progressed. The issue of sustainable transport and the proposed Cardiff Capital Region Metro was raised and it was acknowledged that in the longer term, any development of public transport facilities and services would be complementary to the proposed new section of motorway. However, the complementary measures would seek to maximise access to public transport facilities and services, and benefit personal security. One attendee suggested that it might be difficult to provide a cycleway through the Brynglas Tunnels, should the existing M4 be reclassified. It was suggested that due to potential health and safety problems associated with this issue, an alternative cycle route might be explored that navigates around the Tunnels in the future.

• The scoring for religion and belief criteria was considered to be overly critical and should have minor positive benefits as a result of improved access to places of worship. It was suggested that there will be impacts with increased accessibility for religious groups who travel from Newport to Cardiff on a Friday evening in particular, which is a day that typically sees congestion problems on the motorway.

• The construction of the scheme is likely to attract many gypsy travellers during works, as they generally seek this type of work. The EqIA should consider how to benefit traveller groups.

• A new section of motorway will be positive for the economy and regeneration of Newport as long as there is a suitable junction strategy that provides access to key employment areas off the new road.

• It was noted that a junction strategy would be developed at a scheme level, should the draft Plan be adopted. It was agreed that there should be at least one junction to increase accessibility from the south of Newport; whilst it was appreciated that reclassification of the existing M4 could facilitate measures to increase local accessibility to the north of Newport. It was identified that the new section of motorway would reduce congestion and improve journey times, thus improving local accessibility through by reducing barriers to health services.

Following the draft Plan public consultation, the data received and any relevant comments have been incorporated into this EqIA of the Plan.
6 EqIA Appraisal

The impact of the 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 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 seven scale colour coding system technique that is adopted in WelTAG, shown in Table 5.

Table 5 WelTAG Appraisal Guidance

<table>
<thead>
<tr>
<th>Impact Level</th>
<th>Colour Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Large Positive Impact</td>
<td>(+++)</td>
</tr>
<tr>
<td>Moderate Positive Impact</td>
<td>(++)</td>
</tr>
<tr>
<td>Slight Positive Impact</td>
<td>(+)</td>
</tr>
<tr>
<td>No (or Minimal) Impact</td>
<td>(0)</td>
</tr>
<tr>
<td>Slight Negative Impact</td>
<td>(-)</td>
</tr>
<tr>
<td>Moderate Negative Impact</td>
<td>(--)</td>
</tr>
<tr>
<td>Large Negative Impact</td>
<td>(---)</td>
</tr>
</tbody>
</table>

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.

This strategy level assessment of potential impacts on equality is provided in a series of tables (Tables 6-16), which provides an appraisal of the Plan against the Do Minimum scenario (doing nothing above what is already planned or committed). Table 17 provides a comparison of the appraisals.

As aforementioned, EqIA is an iterative process. This document forms a strategy level EqIA of the M4 Corridor around Newport Plan, and an appropriate qualitative appraisal has been undertaken that builds on previous relevant EqIA. Further and more detailed scheme level EqIA may be undertaken as part of the detailed design stage, where further assessment could 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). It should also be acknowledged that an assessment of the potential impacts on equality will also be carried out as part of scheme level appraisal, in line with the requirements of WelTAG.

The assessment has focussed on the target groups identified in Section 5.1, assessing the likely change to these groups with the Plan being implemented.
Age

The proportion of the Newport population aged over 65 in 2011 was 16.1% which is slightly lower than the proportion for Wales as a whole, which was 18.3%. The proportion of children aged 0-15 years old in Newport was 20.2%, which is a higher proportion than at a Wales level (16.1% in 2011)\(^{25}\). For Newport this represents a 2.3% fall in the proportion of the population aged 0-15 years old from 2001 figures\(^{26}\).

Levels of car ownership are closely linked with age\(^{27}\). 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\(^{28}\). 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\(^{29}\). In addition, the time taken to travel makes part-time evening jobs unviable for many young people\(^{30}\). 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\(^{31}\).

Of interest, these trends are reflected in the draft Plan consultation responses, in that participants were largely over 40 years of age, who use the M4 Corridor around Newport mostly for leisure trips on a daily, weekly or occasional frequency. Whilst this data is sourced from the consultation responses and thus only represents the sample size of those who responded to the consultation; it provides useful context in understanding some typical journeys that are made along this corridor.

In terms of protecting the rights of future generations, 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 6 considers potential impacts on people of different ages.

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\(^{25}\) Office of National Statistics, Census 2011  
\(^{26}\) Office of National Statistics, Census 2001  
\(^{27}\) Bevan Foundation – Accessibility for all – public transport and social inclusion in Wales  
\(^{28}\) DfT – Older people: Their transport needs and requirements  
\(^{29}\) DfT – Evidence Base Review on Mobility: Choices & Barriers for Different Social Groups  
\(^{30}\) DfT – Young people and transport: Their needs and requirements  
\(^{31}\) DfT – Evidence Base Review on Mobility: Choices & Barriers for Different Social Groups
### Table 6 Age

<table>
<thead>
<tr>
<th>Topic</th>
<th>Assessment</th>
<th>Distribution</th>
<th>Significance</th>
</tr>
</thead>
</table>
| **The Plan** | The new section of motorway and its complementary measures would lead to a reduction in traffic congestion, improved resilience, transport safety and journey time reliability. This would bring benefits to people with access to a car.  

The Plan would improve access to services and facilities (e.g. education and healthcare) as well as employment opportunities, primarily for those of working ages. The Plan would be unlikely to significantly benefit those without access to a car, unless public transport services operate along the new road.  

Some stakeholders suggest that highway infrastructure solutions to traffic congestion problems could result in the social exclusion of those without cars. However, the complementary measures will complement public transport services and planned improvements to public transport, thus particularly benefiting younger people and the elderly.  

Community transport services and school travel is disrupted when there is congestion, and severely disrupted when there is an accident or incident on the M4 around Newport. Stakeholders have suggested that many higher education students need to travel along the M4 to reach educational facilities, and the delays on the M4 often mean that they miss or are late for lessons. Improvements in journey time reliability would therefore benefit younger people accessing education services.  

It has also been suggested by stakeholders that access to healthcare services and business meetings would also be more reliable, which would provide efficiency savings. This would largely benefit the working age population.  

The economic and regeneration benefits of the Plan aim to benefit current and future generations. The junction strategy will aim to provide opportunities for economic development.  

The new section of motorway would also improve transport safety, primarily for those driving, by reducing the number of accidents.  

The complementary measures would provide improved walking and cycling connections to modern safety and design standards. These could provide benefits to people of all ages, primarily to those younger and elderly people who may not have access to a car and who are more likely 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. Issues of safety and personal security would be considered at the detailed design stage. | People of all ages. | (+)          |
<table>
<thead>
<tr>
<th>Topic</th>
<th>Assessment</th>
<th>Distribution</th>
<th>Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do Minimum</td>
<td>The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway, which would impact adversely on journey times and journey time reliability. This would impact on people of all ages, but particularly car or bus users that travel along a section and/or junction of the existing motorway to access health, education, employment, services and other facilities. The Do Minimum scenario would also impact on people of all ages who travel by car or on public transport, that travel on the local road network particularly during peak periods; as when there are severe operational problems of the motorway, traffic would likely divert to local roads, exacerbating local accessibility issues.</td>
<td>People of all ages.</td>
<td>(-)</td>
</tr>
</tbody>
</table>

**Disability**

Disabled people have fewer transport options and often lack access to cars\(^{32}\). However, people with mobility difficulties or health problems tend to use cars because they are convenient compared to public transport or walking\(^{33}\).

Research shows that inaccessible transport has an extensive impact on the lives of many disabled people\(^{34}\).

**Table 7 Disability**

<table>
<thead>
<tr>
<th>Topic</th>
<th>Assessment</th>
<th>Distribution</th>
<th>Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Plan</td>
<td>The Plan 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. Some stakeholders suggest that highway infrastructure solutions to traffic congestion problems could result in the social exclusion of those without cars. The new section of motorway would be unlikely to benefit those without access to a car, unless public transport services operate along the new road. However, the complementary measures could bring benefits to those with a disability and without access to a car if walking and cycling links are built with ‘access for all’ in mind. The complementary measures would also improve accessibility to the north of Newport and complement public transport services, improving accessibility for non-car users to healthcare facilities, other services and employment. Issues of safety and personal security would be considered at the detailed design stage.</td>
<td>Disabled persons</td>
<td>(+)</td>
</tr>
</tbody>
</table>

\(^{32}\) National Transport Plan Equalities Impact Assessment (February 2010)  
\(^{33}\) DfT – The Travel Choices and Needs of Low Income Households: the Role of the Car  
\(^{34}\) Leonard Cheshire – Mind the Gap
### Do Minimum

The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which would impact adversely on journey times and journey time reliability. This would impact negatively on those with a disability who are car users, by reducing access to services, facilities and employment opportunities.

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. Compounding accessibility issues would be likely to lead to a lower quality of life for those with a disability.

<table>
<thead>
<tr>
<th>Topic</th>
<th>Assessment</th>
<th>Distribution</th>
<th>Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do Minimum</td>
<td>The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which would impact adversely on journey times and journey time reliability. This would impact negatively on those with a disability who are car users, by reducing access to services, facilities and employment opportunities. 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. Compounding accessibility issues would be likely to lead to a lower quality of life for those with a disability.</td>
<td>Disabled persons</td>
<td>(-)</td>
</tr>
</tbody>
</table>

### 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.

Table 8 Gender Reassignment

<table>
<thead>
<tr>
<th>Topic</th>
<th>Assessment</th>
<th>Distribution</th>
<th>Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Plan</td>
<td>The Plan would bring reduced traffic congestion, improved resilience and journey time reliability. The new section of motorway and its complementary measures would also be designed to improve transport safety and personal security. This would bring benefit to all groups of people in terms of providing improved and safe access to support services, facilities and employment opportunities. Some stakeholders suggest that highway infrastructure solutions to traffic congestion problems could result in the social exclusion of those without cars. In relation to issues of discrimination and personal safety for those without access to a car, the complementary measures would improve the standard and safety of walking and cycling routes, as well as complementing access arrangements to public transport services. Issues around safety and personal security would be considered at the detailed design stage.</td>
<td>Those proposing to undergo, who are undergoing or have undergone a process for the purpose of reassigning gender.</td>
<td>(+)</td>
</tr>
</tbody>
</table>

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The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which will impact adversely on journey time reliability. This would impact negatively on those wishing to access support services, facilities and employment opportunities by car.

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 the road network, on existing walking and cycling links, and on public transport would also remain or even worsen.

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.

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 9 Marriage and Civil Partnership

<table>
<thead>
<tr>
<th>Topic</th>
<th>Assessment</th>
<th>Distribution</th>
<th>Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do Minimum</td>
<td>The Plan would bring reduced traffic congestion, improved resilience, transport safety and journey time reliability. This would bring direct benefit to married couples and those in a civil partnership, who are more likely to have access to a car, improving accessibility to employment opportunities, services and facilities. For those couples that rely on other transport modes, the complementary measures would provide accessibility benefits to the north of Newport, would bring improved walking and cycling links to the local area, and complement public transport services. The complementary measures therefore offer the potential to improve local non-car accessibility while also offering health benefits through improved walking and cycling facilities.</td>
<td>Married couples or those in a civil partnership.</td>
<td>(+)</td>
</tr>
<tr>
<td></td>
<td>Those proposing to undergo, who are undergoing or have undergone a process for the purpose of reassigning gender.</td>
<td></td>
<td>(-)</td>
</tr>
</tbody>
</table>

36 Royal Automobile Club Foundation for Motoring – Car Ownership in Great Britain (2008)
### Do Minimum

The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which would adversely 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. 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.

<table>
<thead>
<tr>
<th>Topic</th>
<th>Assessment</th>
<th>Distribution</th>
<th>Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do Minimum</td>
<td>The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which would adversely 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. 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.</td>
<td>Married couples or those in a civil partnership.</td>
<td>(-)</td>
</tr>
</tbody>
</table>

### 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\(^{37}\).

Alongside accessibility needs, research suggests that exposure to air pollution during early and late pregnancy may curb the normal growth of the developing fetus\(^{38}\).

#### Table 10 Pregnancy and Maternity

<table>
<thead>
<tr>
<th>Topic</th>
<th>Assessment</th>
<th>Distribution</th>
<th>Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Plan</td>
<td>The Plan would bring reduced traffic congestion, improved resilience, transport safety and journey time reliability, benefitting those with access to a car, improving accessibility to key facilities and services (e.g. healthcare / support groups). The Plan provides for complementary measures to complement public transport services, and provide walking and cycling infrastructure as part to improve accessibility to services and facilities, that may be relied upon during pregnancy and maternity. The new section of motorway is aligned away from the main areas of residential properties, and this would also take a significant proportion of traffic off the existing M4 which passes through a number of residential areas to the north of Newport. In this area are four AQMAs. The Plan would help reduce the exposure of pregnant women to air pollution associated with traffic.</td>
<td>Pregnant women or new parents.</td>
<td>(+)</td>
</tr>
</tbody>
</table>

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\(^{37}\) Welsh Consumer Council – People without cars

\(^{38}\) Journal of Epidemiology and Community Health – Ambient Air Pollutant Concentrations During Pregnancy and the Risk of Fetal Growth Restriction (2009)
<table>
<thead>
<tr>
<th>Topic</th>
<th>Assessment</th>
<th>Distribution</th>
<th>Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do Minimum</td>
<td>The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which will impact adversely on journey times and journey time reliability. This would impact negatively on pregnant women or new parents wishing to access healthcare and support services by car. 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 the road network, on existing walking and cycling links, and on public transport would also remain or even worsen. This scenario would also lead to increasing transport levels on the existing M4 which would exacerbate air quality problems around the residential areas to the north of Newport.</td>
<td>Pregnant women or new parents</td>
<td>(-)</td>
</tr>
</tbody>
</table>

**Race**

In 2011, the population of Newport was 145,736 which is a 6.4% rise from the 2001 figure. The population of Newport in 2011 was with 89.9% of people from a white background and 10.1% of people from a non-white background. Newport has the second largest number of people from a non-white background in Wales, second to Cardiff only. This equates to Newport having a higher proportion of people from a non-white background than for Wales as a whole (Newport 10.1%, Wales 4.3% in 2011). Data collected from participants of the draft Plan consultation shows that 1% of respondents identified themselves to be of a nationality outside of the UK, whilst 7% chose to select the option not to disclose that information.

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.

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.

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40 Office of National Statistics, Census 2011
42 DfT – Public Transport Needs of Minority, Ethnic and Faith Communities Guidance Pack
Table 11 Race

<table>
<thead>
<tr>
<th>Topic</th>
<th>Assessment</th>
<th>Distribution</th>
<th>Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Plan</td>
<td>The Plan would bring reduced traffic congestion, improved resilience, transport safety and journey time reliability for those with access to a car. This would improve access to facilities, services and employment opportunities. The Plan aims to provide significant economic benefits and support the regeneration of Newport. The junction strategy will aim to provide opportunities for economic development and complement public transport access to key employment sites. This would particularly benefit adults from minority ethnic groups who may be on low incomes or who have problems accessing employment opportunities with or without a private vehicle. Some stakeholders suggest that highway infrastructure solutions to traffic congestion problems could result in the social exclusion of those without cars. Unless public transport services operate along the new road, it is unlikely to benefit those without access to a car. However, the complementary measures would complement public transport services, improve access to facilities, services and employment through bringing accessibility benefits to the north of Newport, improving walking and cycling networks and thus benefit those without access to a car. There are no authorised traveller sites in Newport, which is a popular stop-off destination for the many travellers who use this popular and strategic east-west route. It may be that travellers will bypass Newport if the new road is implemented with few junctions. The construction of the scheme is likely to attract many traveller groups during works, as they generally seek this type of work. Whilst employment opportunities would be welcomed by this group, sufficient facilities would need to be provided during their temporary residence. Issues of safety and personal security would be considered at the detailed design stage.</td>
<td>Minority ethnic and faith communities</td>
<td>(+)</td>
</tr>
<tr>
<td>Do Minimum</td>
<td>The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which will adversely impact on journey times, transport safety and 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. Safety concerns on the road network, on existing walking and cycling links, and on public transport would also remain or even worsen.</td>
<td>Minority ethnic and faith communities</td>
<td>(-)</td>
</tr>
</tbody>
</table>
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 opportunities43.

Table 12 Religion and Belief

<table>
<thead>
<tr>
<th>Topic</th>
<th>Assessment</th>
<th>Distribution</th>
<th>Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Plan</td>
<td>The Plan would bring reduced traffic congestion, improved resilience, transport safety and journey time reliability for those with access to a car. This would improve access to facilities including places of worship. There will be specific positive impacts with increased accessibility for Somali Muslims who predominantly travel from Newport to Cardiff to access places of worship. Some stakeholders suggest that highway infrastructure solutions to traffic congestion problems could result in the social exclusion of those without cars. Unless public transport services operate along the new road, it is unlikely to benefit those without access to a car. However, complementary measures would improve access to facilities, services and employment through bringing accessibility benefits to the north of Newport and improving walking and cycling networks and opportunities for public transport along the reclassified road and its junctions. Issues of safety and personal security would be considered at the detailed design stage.</td>
<td>Those of a particular religion or belief.</td>
<td>(+)</td>
</tr>
</tbody>
</table>

43 DfT – Public Transport Needs of Minority, Ethnic and Faith Communities Guidance Pack
### Do Minimum

The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which will impact adversely on journey times and 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. The Do Minimum scenario would impact adversely on those reliant on alternative transport modes, particularly during peak periods where traffic would divert to local roads, exacerbating local accessibility issues.

In terms of spirituality, Christians mainly travel on Sunday mornings to places of worship locally, when there is generally less traffic on the roads. Most Muslims in Newport tend to walk to their local places of worship, so there will be little effect on their travel unless the complementary measures are of benefit to their routes for walking. However, there will be specific adverse impact on Somali Muslims who predominantly travel from Newport to Cardiff to access places of worship.

Safety concerns on the road network, on existing walking and cycling links, and on public transport would also remain or even worsen.

<table>
<thead>
<tr>
<th>Topic</th>
<th>Assessment</th>
<th>Distribution</th>
<th>Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do Minimum</td>
<td>The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which will impact adversely on journey times and 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. The Do Minimum scenario would impact adversely on those reliant on alternative transport modes, particularly during peak periods where traffic would divert to local roads, exacerbating local accessibility issues. In terms of spirituality, Christians mainly travel on Sunday mornings to places of worship locally, when there is generally less traffic on the roads. Most Muslims in Newport tend to walk to their local places of worship, so there will be little effect on their travel unless the complementary measures are of benefit to their routes for walking. However, there will be specific adverse impact on Somali Muslims who predominantly travel from Newport to Cardiff to access places of worship. Safety concerns on the road network, on existing walking and cycling links, and on public transport would also remain or even worsen.</td>
<td>Those of a particular religion or belief.</td>
<td>(-)</td>
</tr>
</tbody>
</table>

### Sex (Gender)

In 2011, the population of Newport was 145,736 which is a 6.4% rise from the 2001 figure. The population of Newport in 2011 was 51% female and 49% male.

A higher proportion of adult men than adult women have full car driving licences in all age groups. 83% of male respondents use a car or van to travel to work compared with only 76% of female respondents. 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.

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

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45 Equal Opportunities Commission – Promoting gender equality in transport
47 DfT – Evidence Base Review on Mobility: Choices & Barriers for Different Social Groups
48 DfT – In car safety and the personal security needs of female drivers and passengers
49 DfT – Public transport gender audit evidence base
50 Welsh Consumer Council – People without cars
### Table 13 Sex (Gender)

<table>
<thead>
<tr>
<th>Topic</th>
<th>Assessment</th>
<th>Distribution</th>
<th>Significance</th>
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</thead>
<tbody>
<tr>
<td><strong>The Plan</strong></td>
<td>The Plan would bring reduced traffic congestion, improved resilience, transport safety 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). The complementary measures will complement public transport services, improve walking and cycling infrastructure and improve access to the north of Newport. This will offer a positive benefit for women who are more dependent on public transport services than men. The peak for rush hour is spreading, which means that people may travel to work earlier or later, which impacts on personal time, time with family, organising childcare and compromises the work/life balance. If journey times are improved and journey time reliability is increased, there could be more time for leisure and recreation, which brings health and wellbeing benefits. Complementary measures would also improve the overall provision of walking and cycling facilities, promoting a healthier lifestyle and potentially bringing health benefits. Issues of safety and personal security would be considered at the detailed design stage.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Women and men</td>
<td>(+)</td>
<td></td>
</tr>
<tr>
<td><strong>Do Minimum</strong></td>
<td>The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which would impact adversely on journey time, transport safety and 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. This would also continue to adversely impact those reliant on public transport for accessing employment, services and facilities, particularly during peak periods where traffic would divert to local roads, exacerbating local accessibility issues. Safety concerns on the road network, on existing walking and cycling links, and on public transport would also remain or even worsen. This would have a specific impact on personal security for women who are more likely to travel by public transport or on foot.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Women and Men</td>
<td>(-)</td>
<td></td>
</tr>
</tbody>
</table>
**Sexual Orientation**

Sexual orientation means a person’s sexual orientation towards:

a) persons of the same sex;

b) persons of the opposite sex;

c) persons of either sex.

Research has shown that many LGB people living in rural or suburban districts can only access appropriate social activities, support groups, or help and advocacy services by public transport\(^1\). 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\(^2\).

<table>
<thead>
<tr>
<th>Table 14 Sexual Orientation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Topic</strong></td>
</tr>
<tr>
<td>The Plan</td>
</tr>
<tr>
<td>Do Minimum</td>
</tr>
</tbody>
</table>

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\(^1\) The Intercom Trust – The Extended Neighbourhood

\(^2\) Diversity Matters Hastings/ Hastings Rainbow Alliance – Report into Homophobic and Transphobic Hate Crimes in Hastings
**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.  

**Table 15 Welsh Language**

<table>
<thead>
<tr>
<th>Topic</th>
<th>Assessment</th>
<th>Distribution</th>
<th>Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Plan</td>
<td>The Plan would bring reduced traffic congestion, improved resilience, transport safety and journey time reliability to the north and south of Newport and east-west along the M4 Corridor in South East Wales. This would benefit access to cultural facilities and services. However, the impact on Welsh language is considered to be limited. The provision of bi-lingual information at road junctions and along walking and cycling facilities would be provided. This will be considered at the detailed design stage.</td>
<td>Welsh speakers</td>
<td>(0)</td>
</tr>
<tr>
<td>Do Minimum</td>
<td>Current road signs are bi-lingual and any additional signs implemented as part of the do minimum improvements would be bi-lingual.</td>
<td>Welsh speakers</td>
<td>(0)</td>
</tr>
</tbody>
</table>

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

In Newport, neighbourhoods with some of the country’s highest levels of social deprivation sit next to some of those with the greatest affluence. The Wales Index of Multiple Deprivation (WIMD) is the official measure of deprivation of small areas in Wales.

The WIMD 2011 is made up of eight separate kinds of deprivation: income, employment, health, education, housing, access to services, environment and community safety. For Newport, 16% of the Lower Super Output Areas (LSOA) fall within the 10% most deprived LSOAs in Wales, and 44% of LSOAs fall within the 50% most deprived LSOAs in Wales.

According to Newport’s Community Strategy, Newport has a labour catchment population of 479,000 people living within 30 minutes’ drive; and 1.6 million people, over a third of the population of Wales, live within one hour of the city.

In 2011, 69,800 people commuted to work in the city from various parts of Wales and England. Focusing on Wales commuters specifically, Newport is the second biggest, destination, after Cardiff.

For the period January-December 2013, 26.4% of the residents of Newport aged 16-64 were economically inactive compared to 25% for Wales. The Claimant Count Rate supports these figures; the percentage of people aged between 16 and 64 claiming the Job Seeker’s Allowance (JSA) benefit is 3.4% across Wales, whilst in Newport it is 5%.

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

54 Stats Wales, Wales Index of Multiple Deprivation 2011
56 Office for National Statistics, Claimant Count 2014
people claiming income support or jobseeker’s allowance do not have access to a car\textsuperscript{57}. 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\textsuperscript{58}.

Whilst access to a car may only be one of the factors in contributing to the social exclusion of low income households, 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 16 Lone Parent, Economic Inactivity, Social and Multiple Deprivation

<table>
<thead>
<tr>
<th>Topic</th>
<th>Assessment</th>
<th>Distribution</th>
<th>Significance</th>
</tr>
</thead>
</table>
| **The Plan**           | The Plan would reduce traffic congestion, improve resilience, transport safety and journey time reliability. This would benefit all users with access to a car accessing facilities, services and employment opportunities.  
The Plan would improve accessibility to health, care, training and education facilities and services. However this would primarily benefit those with access to a private vehicle, although the complementary measures would provide accessibility benefits to public transport users and non-motorised users.  
The complementary measures would lead to an increased level of choice for local trips by walking and cycling, and easier access to key local services and commercial centres, while also offering opportunities for health benefits. They would also complement public transport services, benefitting those on low incomes or those who have problems accessing employment opportunities without a car.  
The 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, contributing to increased economic activity and supporting the regeneration of Newport. The junction strategy will aim to provide increased opportunities for economic development and accessibility to existing and future employment sites by all car and public transport.  
The Plan would also bring benefits to air and noise pollution, particularly along the route of the existing motorway, benefitting communities in the urban areas of Newport. Limited property demolition could be needed and this would be considered at the detailed design stage. | Income related groups | (+++)          |
| **Do Minimum**         | The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which will impact adversely on | Income related groups | (--)          |

\textsuperscript{57} Campaign for Better Transport - Transport, social equality and welfare to work  
\textsuperscript{58} DfT – Evidence Base Review on Mobility: Choices & Barriers for Different Social Groups
Welsh Government M4 Corridor Around Newport Equality Impact Assessment

<table>
<thead>
<tr>
<th>Topic</th>
<th>Assessment</th>
<th>Distribution</th>
<th>Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>journey times, transport safety and journey time reliability. This continuation of problems on the M4 Corridor around Newport would continue to hamper economic growth potential of the region, restrict the movement of people and freight, particularly at peak periods. Traffic forecasting suggests that the problems will continue to worsen and severe operational problems will be experienced on all sections of the M4 around Newport in the longer term. Air quality and noise pollution problems would also continue to worsen along the existing motorway, impacting on people living and working in the urban centres of Newport.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

6.1 EqIA Appraisal Summary

Table 17 provides a comparative summary of the EqIA of the Plan and the Do Minimum scenario.

<table>
<thead>
<tr>
<th>Equalities and WelTAG Criteria</th>
<th>The Plan</th>
<th>Do Minimum Scenario</th>
</tr>
</thead>
<tbody>
<tr>
<td>Age</td>
<td>(+)</td>
<td>(-)</td>
</tr>
<tr>
<td>Disability: physical, sensory or mental</td>
<td>(+)</td>
<td>(-)</td>
</tr>
<tr>
<td>Gender Reassignment</td>
<td>(+)</td>
<td>(-)</td>
</tr>
<tr>
<td>Marriage and Civil Partnership</td>
<td>(+)</td>
<td>(-)</td>
</tr>
<tr>
<td>Pregnancy and maternity</td>
<td>(+)</td>
<td>(-)</td>
</tr>
<tr>
<td>Race</td>
<td>(+)</td>
<td>(-)</td>
</tr>
<tr>
<td>Religion and Belief</td>
<td>(+)</td>
<td>(-)</td>
</tr>
<tr>
<td>Sex</td>
<td>(+)</td>
<td>(-)</td>
</tr>
<tr>
<td>Sexual orientation</td>
<td>(+)</td>
<td>(-)</td>
</tr>
<tr>
<td>Welsh language</td>
<td>(0)</td>
<td>(0)</td>
</tr>
<tr>
<td>Other: Lone parent, economic inactivity, social and multiple deprivation</td>
<td>(++)</td>
<td>(--</td>
</tr>
</tbody>
</table>
The appraisal highlights that there are would be no significant adverse effects arising for any character group and that the Plan would bring neutral or positive benefits to all groups of people.

The Plan has 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).

Whilst predominantly benefiting those with access to the car, the Plan also brings benefit to those reliant on public transport to access services, facilities and employment through its complementary measures. These will improve access to the north of Newport, complement public transport services, and enhance walking and cycling infrastructure. The Plan will also reduce the amount of traffic on the existing motorway and local road network, particularly during peak periods, which currently divert in order to avoid congestion on the M4 and exacerbate local accessibility problems.

The Do Minimum scenario would lead to continuing traffic congestion on the existing motorway which would impact adversely on transport safety, journey times and 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 and increased traffic congestion would lead to personal security concerns and in the worst case could lead to social exclusion by deterring the movement of some protected characteristic groups. Continued traffic congestion will also further hamper economic growth and prosperity in the region, restricting the movement of freight and people, particularly at peak periods.
7 Action Plan

Table 18 provides an overview of potential actions that the Welsh Government will consider as part of scheme development that would be progressed as part of its Plan for the M4 Corridor around Newport. The actions outlined below aim to enhance the possible beneficial impacts for protected characteristics groups as a result of the Plan being implemented. Whilst no potential adverse impacts have been identified at this stage, the actions outlined also aim to reduce or remove any potential unforeseen adverse impacts resulting from the Plan or its schemes on an equality impact group.

Further and more detailed assessment of the potential impacts on equality will be carried out as part of scheme level appraisal, in line with the requirements of WelTAG.

Most of the actions are relevant to a scheme level of appraisal, whilst monitoring would be proposed and/or undertaken by the Welsh Government as part of the potential detailed design, construction and operation of schemes.

Table 18 Action Plan

<table>
<thead>
<tr>
<th>Actions to be considered</th>
<th>Rationale</th>
<th>Who will mostly benefit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ensure ergonomically designed access to public transport facilities that facilitate use for all.</td>
<td>The design of access to public transport services should cater for all needs and mobility issues.</td>
<td>Women with children Older people Disabled people</td>
</tr>
<tr>
<td>Plan appropriate pedestrian routes and conveniently located interchanges to public transport services, discussed in partnership with community groups and operators.</td>
<td>To maximise potential accessibility benefits to facilities and services. To improve access to public transport services and ensure that proposals could be complementary to the proposed Cardiff Capital Region Metro. To encourage modal shift for local trips. To maximise health and wellbeing benefits.</td>
<td>Younger people Older people Ethnic groups LGB/T Lower socio-economic groups</td>
</tr>
<tr>
<td>Design-out crime at public transport interchanges.</td>
<td>To improve personal security and encourage use of public transport.</td>
<td>Younger people Older people Ethnic groups LGB/T</td>
</tr>
<tr>
<td>Appropriate diversions to any highway or pedestrian/cycle/equestrian route should be made, if required, during construction works that might obstruct an existing route.</td>
<td>To maintain access to properties, facilities and services during construction.</td>
<td>Younger people Older people Ethnic groups LGB/T Women with children</td>
</tr>
<tr>
<td>Actions to be considered</td>
<td>Rationale</td>
<td>Who will mostly benefit</td>
</tr>
<tr>
<td>----------------------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------</td>
<td>----------------------------------------------</td>
</tr>
</tbody>
</table>
| Appropriate measures should be introduced to maintain or enhance any highway or pedestrian/cycle/equestrian route, if appropriate. | To maintain access to properties, facilities and services by all modes of transport. | Younger people  
Older people  
Ethnic groups  
LGB/T  
Women with children |
| Identify opportunities to address cultural needs as part of scheme development.          | To ensure that vulnerable groups benefit from improved access to community facilities and services including healthcare and places of worship.  
To provide for travellers who may be attracted to the local area during construction works. | Ethnic groups |
| Consider measures to enhance accessibility to centres that promote cultural and historical identity. | To protect Welsh culture.  
To promote the use of Welsh language.  
To ensure inclusive access to those not travelling by car.  
Improve the safety of road users and pedestrians. | Welsh language users  
Younger people  
Older people  
Ethnic groups  
Welsh language users |
| Ensure clear and appropriate signage and information services are displayed at public transport interchanges and along road routes. | Effective signage and information supports access to transport services and aids mobility. | Younger people  
Older people  
Ethnic groups  
Welsh language users |
| Ensure inclusive design principles are incorporated into the design of new junctions to accommodate non-motorised users. | To ensure inclusive access to those not travelling by car.  
Improve the safety of road users and pedestrians. | Older people  
Disabled people |
| Offer appropriate compensation for properties requiring demolition, including replacement of any community facilities. | To ensure certain community groups are not disproportionately affected by demolition and/or construction works. | Lower socio-economic groups  
Older people  
Ethnic groups |
| Ensure the procurement process associated with any option targets the recruitment and training of women and protected characteristics groups (during construction and maintenance activities) | Improve local opportunities and access to employment and training for women and protected characteristics groups. | Women  
Ethnic groups  
Disabled people  
LGB/T  
Lower socio-economic groups |
| Prepare a Monitoring and Evaluation Plan | To outline and undertake monitoring of impacts and effects associated with schemes progressed through the Plan. | All |
|                                                                                       |                                                                           |                                              |