

Welsh Government

**A40 Llanddewi Velfrey to Penblewin
Improvements**

Environmental Statement Chapter 3:
Alternatives Considered

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3 Alternatives considered

3.1 Introduction to the chapter

3.1.1 This chapter of the Environmental Statement (ES) outlines the main alternatives considered during the development of the Scheme. In addition, it sets out the main reasons for the selection of the key elements of the Scheme, including the following:

- a) Selection of a suitable carriageway option that includes 2+1 overtaking opportunities;
- b) Selection of the broad route corridor;
- c) Selection of the junction options;
- d) Local roads;
- e) Selection of the design included within the Draft Statutory Orders.

3.1.2 The current 2014 EIA Directive requires that an ES should include ‘A description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.’ A summary of the reasonable alternatives should be provided together with a comparison of the environmental effects.’

3.1.3 This chapter includes an outline account of the main and reasonable alternatives to the Scheme that have been considered by the Welsh Government and its advisors, taking into account their potential environmental impacts. Secondly, this chapter includes a description of the iterative development of the Scheme and the justification behind any design changes.

3.2 Previous studies

3.2.1 A great deal of development work has been undertaken before work under the current contract commenced. This work informed both the location of planned improvements and the preferred design of highway improvements along the A40 between St Clears and Haverfordwest. A timeline of previous development work is provided in Figure 3.1.

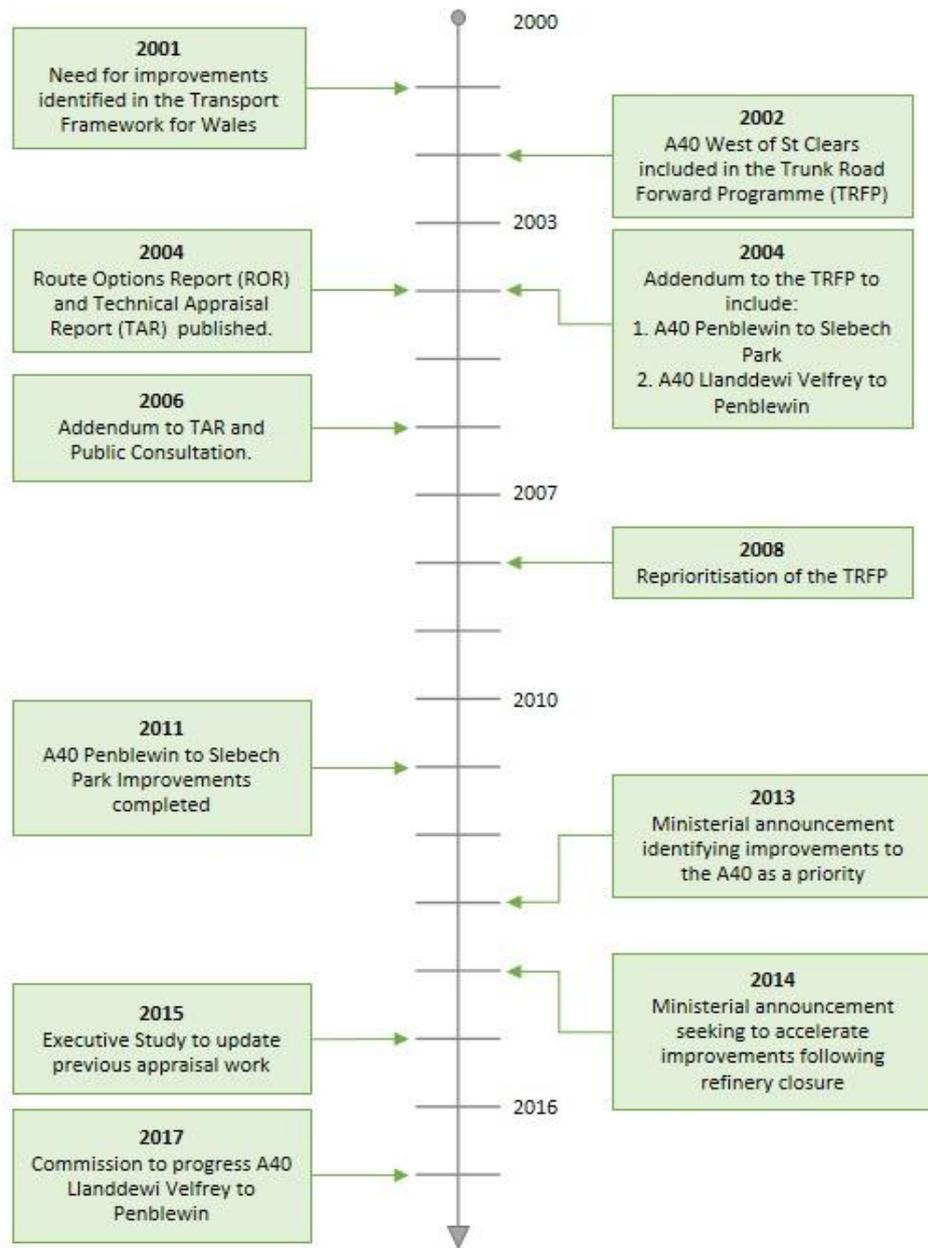


Figure 3.1 Timeline of previous development work

2001

3.2.2 Following the completion of a study looking at a range of transport options, the Transport Framework for Wales (2001) identified that the A40 west of St Clears was in need of improvements.

2002 to 2004

3.2.3 In March 2002, the Trunk Road Forward Programme (TRFP) outlined that ‘*Improvement of the A40 trunk road, whether it be to single or*

dual carriageway standard, is beneficial in economic terms' and stating that *'The A40 in West Wales forms the lowest standard section of the Trans-European Road Network in the United Kingdom'*. This early work steered the decision to pursue road-based enhancements on the A40 and a Route Options Report (ROR) was subsequently commissioned in 2004 to explore single and dual carriageway options for the entire route from St Clears to Haverfordwest. Within the overall study, a total of eight options were considered for a bypass the village of Llanddewi Velfrey with the section from Ffynnon Wood to Penblewin included as a maintenance scheme:

- Option 1 a northern relief road passing to the north of the Blaen-pen-troydin Farm from Gwyndy Farm to Ffynnon Wood;
- Option 2 a short relief road for the eastern half of the village;
- Option 3 a minor realignment for the eastern half of the village;
- Option 4 a northern relief road passing to the north of the Blaen-pen-troydin Farm from Bethel Chapel to east of Ffynnon Wood;
- Option 5 a northern/southern relief road, which would cross the line of the existing road in the village centre;
- Option 6 a northern relief road passing to the south of Blaen-pen-troydin Wood;
- Option 7 a northern relief road passing to the north of the Blaen-pen-troydin Farm from Bethel Chapel to Ffynnon Wood;
- Option 8 a northern relief road passing to the north of Blaen-pen-troydin Wood.

3.2.4 Each of the options were appraised using the Scottish Trunk Road Appraisal Guidance (STAG) and the 2004 ROR concluded that several options performed better in the appraisal process and these were taken forward for further consideration. Routes not considered further were discarded based on cost; failure to address the identified problems; or because they would have major adverse environmental effects on woodland habitat.

3.2.5 As part of the 2004 studies, a few horizontal alignments were developed to determine optimum routes that would minimise agricultural severance, avoid sensitive ecological features and large earthworks. In the same year, a DMRB Stage 2 Environmental Appraisal Report (EAR) was also completed and a Business Case was

developed and formed the basis of a submission to the Assembly Minister.

- 3.2.6 Following the findings of the appraisal within the 2004 studies, the Welsh Government announced the publication of an addendum to the 2002 Trunk Road Forward Programme and this included two major improvement schemes for the A40 west of St Clears:

A40 Penblewin – Slebech Park improvement: completed in March 2011;

and

A40 Llanddewi Velfrey to Penblewin improvement: focus of this ES.

2006

- 3.2.7 Following this announcement, an addendum to the 2004 Technical Appraisal Report was completed in 2006. Two further route options were considered with single carriageway and 2+1 carriageways considered. The two options considered further were:

- a) **Option 5, The Central Route** – close to the existing trunk road network;
- b) **Option 8, The Northern Route** – that took a route around the north of Blaen-pen-troydin Wood and Llanddewi Velfrey village centre.

- 3.2.8 The environmental impact of both options was concluded to be similar in magnitude but slightly different in type with Option 8, Northern Route, providing an effective bypass but having an adverse impact on land use and landscape. The Central Route might not be perceived as an effective bypass and could have an adverse impact on the structure and landscape of the village of Llanddewi Velfrey.

- 3.2.9 In addition, consideration was given to the section between Ffynnon Chapel and Penblewin Roundabout which would be the same for both schemes. The 2006 study explored:

- a) **Online improvements** following the existing alignment;
- b) **Online 2+1 standard;** and
- c) **Offline 2+1 standard.**

3.2.10 The 2006 report recommended that all the above options should be taken forward for public consultation. A consultation process was subsequently completed in 2006 over an eight-week period with a public exhibition held in Llanddewi Velfrey on 13 and 14 September 2006. In summary, the consultation sought views on the following route options:

Blue Route: a bypass option to the north of Llanddewi Velfrey from Gwyndy Farm to Ffynnon Wood.

Red Route: an option which follows closely the existing trunk road.

Orange Route: online improvement of the existing trunk road between Ffynnon Wood and Penblewin Roundabout.

Purple Route: offline improvement between Ffynnon Wood and Penblewin Roundabout.

These routes are shown in the Design Options Report published in 2015; a copy of which is contained in Volume 3 Appendix 3.1.

3.2.11 The consultation showed clear public support for improving the section of the A40 between Gwyndy Farm and Penblewin Roundabout. There was a clear preference expressed for the Blue Route, however no clear preference emerged for either the Purple or Orange routes. The consultation showed there was strong support for the proposed bypass of Llanddewi Velfrey between Gwyndy Farm and Ffynnon Wood. Of the options presented, the Blue Route was preferred. Whilst there was also overall support for improvements to the section of A40 between Ffynnon Wood and the Penblewin Roundabout, there was no clear preference expressed on the routes presented.

2008

3.2.12 Following this consultation, the Llanddewi Velfrey to Penblewin scheme was included within the reprioritisation of the TRFP in 2008 and has since received continued ministerial support.

2010

3.2.13 Publication of Preferred Route occurred in 2010, with a report on the previous Public Consultation in 2006 published in February of 2010. The Deputy First Minister decided to adopt the Blue Route as the Preferred Route to bypass Llanddewi Velfrey and the Purple Route as

the Preferred Route between Ffynnon Wood and Penblewin. The TR111 Preferred Route Plan was published to protect the entire route for planning purposes under the Town and Country Planning (General Development Procedure) Order 1995. This means that the Local Planning Authority must refer to the Welsh Assembly Government all future planning applications that are near the Preferred Route. The TR111 plan was deposited at the Pembrokeshire County Council offices in Haverfordwest, in the Post Office in Narberth and the Welsh Government offices in Cardiff.

- 3.2.14 The TR111 Plan showing the line of the Preferred Route is included in Volume 3 Appendix 3.2.

2013

- 3.2.15 In July 2013, Edwina Hart, Minister for Economy, Science and Transport, published a written statement outlining her priorities for Transport. This statement included:

‘Improving the A40 has been identified as a priority by the Haven Waterway Enterprise Zone Board and I intend to undertake further development of previously proposed improvements.’

2014

- 3.2.16 A Strategic Outline Case for the A40 Llanddewi Velfrey to Penblewin Improvement was produced by the Welsh Government in June 2014. It concluded that the Scheme would be likely to provide benefits that outweighed its costs with a Benefit to Cost Ratio (BCR) of around 1.1¹. It was suggested that the figure understated the level of benefits of the scheme as it only considered the scheme in isolation and, as the BCR is calculated at a UK level, underestimated the local benefits. It was set out that:

‘The allocation of additional CRC funding would ensure increased certainty for the delivery of the A40 Llanddewi Velfrey to Penblewin scheme in accordance with the commitments made in the National Transport Plan. In addition, it would enable re-allocation of Transport Capital funding to other projects where budgetary constraints present a significant

¹ Welsh Government A40 Llanddewi Velfrey to Penblewin Improvement Strategic Outline Case June 2014.

risk to the delivery of commitments made within the Prioritised National Transport Plan (PNTP).’

- 3.2.17 The proposals for A40 improvements were further expressed by the Welsh Government in November 2014 following the announcement of the closure of the Milford Haven Refinery. Reflecting on this announcement, the Minister made the following oral statement in Plenary:

“In terms of transport links... I have instructed my officials to accelerate to the fullest extent possible the programme for delivering improvements at Llanddewi Velfrey. I have also asked my officials to conduct further urgent work to explore additional ways to improve the A40, including the potential for dualling.”

2015

- 3.2.18 A study in 2015 considered options for improvement of the A40 including the A40 Llanddewi Velfrey to Penblewin improvement, applying the WelTAG appraisal process. This included the committed scheme which had emerged through previous development work and was referenced within the Pembrokeshire LDP.

- 3.2.19 The study concluded:

‘There remains a good case for proceeding with the A40 Llanddewi Velfrey to Penblewin improvement scheme, using the 2+1 configuration which is currently included in the National Transport Schedule.’

‘The scheme includes unambiguous lengths for overtaking, would address community severance in the village of Llanddewi Velfrey and deliver small improvements to journey times, journey reliability and road safety on the A40’.

2017

- 3.2.20 In February 2017, the Welsh Government appointed Carillion, with Arup and RML as their technical advisors, to develop the design of the proposed A40 Llanddewi Velfrey to Penblewin Improvements up to publication of draft Orders. The contract was awarded on the basis of a northern bypass for Llanddewi Velfrey from Gwyndy Farm to Ffynnon Wood and an offline improvement from Ffynnon Wood to

Penblewin. The original contract required the team to build on the previous work, and to carry out a WelTAG Appraisal in accordance with the newly published WelTAG 2017. The WelTAG appraisal approach was applied to identify the problems on the existing A40, scheme objectives and solutions to be incorporated within the scheme.

2018

- 3.2.21 Since the liquidation of Carillion in January 2018, a new contract was awarded to Arup - supported by RML - to complete the WelTAG process and to continue with developing the scheme.

3.3 What is WelTAG?

- 3.3.1 Welsh Government adopted the Welsh Transport Planning and Appraisal Guidance (WelTAG) in 2008. This method of appraisal is for assessing proposed strategies, plans and schemes. It is intended to provide information about significant economic, environmental and social impacts so that decision makers can judge the merits of proposals using a consistent approach.
- 3.3.2 As stated in 3.2.20, the Welsh Government published an updated WelTAG in 2017, named WelTAG 2017. WelTAG 2017 was used for the appropriate appraisals for the Scheme.
- 3.3.3 The options for the A40 Llanddewi Velfrey to Penblewin Improvements were compared against the Transport Planning Objectives and the criteria of Welsh Impact Areas (the ‘three pillars of sustainability’) that underlie policy in Wales: the economy, the environment and society (including legal requirements and the desire to protect and enhance the condition of the built and natural environment). The Transport Planning Objectives and Welsh Impact Areas underpin the appraisal process by allowing each option to be appraised to see if it is likely to succeed in addressing problems and achieving the objectives. When a proposal performs poorly against Welsh Impact Areas it is unlikely to gain support from the Welsh Government.

The WelTAG Stage 1 Appraisal

- 3.3.4 The WelTAG Stage 1 built on previous development work, considering the outcome of the 2006 consultation work, along with a

do minimum option (to assess the current conditions in a future year taking into account planned and committed measures) and a public transport intervention. The WelTAG Stage 1 Report is included in Volume 3 Appendix 3.3.

3.3.5 The WelTAG Stage 1 Report recommended, from those described below, Highway Option 3 (Option A) for further consideration:

Option 1: Do Minimum: limited intervention reflecting the existing situation with the addition of any planned or committed measures as identified in the Pembrokeshire LDP.

Option 2: Public Transport Improvements: improvements to existing public transport services which would increase the frequency and operating hours of the bus service #322 between Carmarthen and Haverfordwest.

Option 3: Highway Option A: An offline option taking a route north of Llanddewi Velfrey (along a similar line to the previous Blue option) and reflecting previous public opinion, along with an offline improvement between Ffynnon Wood and Penblewin Roundabout (along a similar line to the previous (Purple option), offering maximum extents of 2+1 carriageway.

Option 4 – Highway Option B: An offline option taking a route north of Llanddewi Velfrey (along a similar line to the previous Blue option) and reflecting previous public opinion. The option would then re-join the existing A40 in the Ffynnon Wood area with limited interventions proposed between Ffynnon Wood and Penblewin (along a similar line to the previous Orange option).

WelTAG Stage 2 Appraisal

3.3.6 WelTAG Stage 2 involved the assessment of three different variations on Highway Option 3 (listed previously in paragraph 3.3.5). These were alternative alignments and junctions which are described below (shown in the WelTAG Stage 2 Report which is provided in Volume 3 Appendix 3.4):

- a) A four-armed roundabout provided at either end of the Scheme, with no intermediate junction, but a parallel road from Penblewin to provide local access to Ffynnon and several access roads that would be severed by Highway Option A.

- b) A four-armed roundabout would be provided at either end of the Scheme, with intermediate T-junctions to allow local traffic to join from the north (Ffynnon), and south (Llanddewi Velfrey). A parallel road from Penblewin would also provide local access to Ffynnon and several accesses that would be severed by Highway Option A.
- c) A four-armed roundabout would be provided at the western end of the Scheme and T-junctions at the eastern end of the Scheme, with intermediate T-junctions to allow local traffic to join from the north (Ffynnon), and south (Llanddewi Velfrey). A parallel road from Penblewin would also provide local access to Ffynnon and several accesses that would be severed by Highway Option A.

3.3.7 A ‘do minimum’ option was also appraised. This reflecting the existing situation with only limited intervention on the A40, but also taking account of any planned or committed measures as identified in the Pembrokeshire LDP. The full assessment is set out in the published WelTAG Stage 1 and Stage 2 reports.

3.3.8 The WelTAG Stage 2 appraisal (report provided in Volume 3 Appendix 3.4) showed that Option 3 provided the best long term, sustainable solution. It met most of the objectives and, alongside Option 2, best addressed social and cultural criteria. All options performed badly against environmental criteria (see Table 3.1), but Option 3 performed better than the others regarding effects on air quality and noise. Option 3 also performed best on economic criteria. The WelTAG Stage 2 Report (provided in Volume 3 Appendix 3.4) recommended that Option 3 be taken forward for WelTAG Stage 3 appraisal. The Preferred Route is shown in Volume 3 Appendix 3.2.

Environmental considerations for route selection

3.3.9 A summary of the environmental effects of the options is set out in Table 3.1. These are broad descriptions of potential impacts based on information that was known at the time of the selection process. The details assume typical mitigation measures would be applied. Traffic modelling suggests that traffic will not increase as a result of the scheme.

3.3.10 Table 3.1 does not take account of the gradual conversion to electrically powered vehicles, a government policy measure which is likely to reduce air pollution, production of greenhouse gasses and traffic noise.

Table 3.1 WelTAG Stage 2 Appraisal: environmental effects of the options

Option:	1: Do Minimum	2: Public Transport Improvements	3: Highway Option A	4: Highway Option B
Impact type	Outline description of environmental effects of options			
Noise	No change to current undesirable traffic noise affecting people close to A40.		<p>Reductions in noise at many properties along and near existing A40, but some increases at some properties near the proposed bypass.</p> <p>Proposed roundabout at eastern end could increase noise for nearby properties from breaking, waiting and accelerating vehicles.</p> <p>Traffic noise for some properties west of Ffynnon Wood could be slightly reduced with the A40 traffic moved away to the north of the existing road.</p>	<p>Reductions in noise at many properties along and near existing A40 in Llanddewi Velfrey, but some increases at properties near the proposed bypass.</p> <p>Proposed roundabout at eastern end could increase noise for nearby properties from breaking, waiting and accelerating vehicles.</p> <p>Traffic noise in properties in Ffynnon Wood and to the west would be like the current situation.</p>
Air Quality	Current situation: undesirable air pollution from traffic affecting people close to the A40.		<p>A40 traffic would no longer pass through Llanddewi Velfrey, reducing exposure to air pollution for residents. The new alignment would bring traffic closer to some properties to the north of Llanddewi Velfrey.</p> <p>Properties on the A40 west of Ffynnon Wood could also experience benefit from an increase in air quality with the A40 traffic moved away to the north of the existing road.</p> <p>Potential for local air quality to be adversely affected temporarily during construction.</p> <p>Proposed roundabout at eastern end could increase air</p>	<p>A40 traffic would no longer pass through Llanddewi Velfrey, reducing exposure for residents there. The new alignment will bring traffic closer to some properties to the north of Llanddewi Velfrey.</p> <p>Properties on the A40 west of Ffynnon Wood would not experience these benefits.</p> <p>Potential for local air quality to be affected temporarily during construction.</p> <p>Proposed roundabout at eastern end could increase air pollution from breaking, waiting and accelerating</p>

Option:	1: Do Minimum	2: Public Transport Improvements	3: Highway Option A	4: Highway Option B
Impact type	Outline description of environmental effects of options			
			pollution from breaking, waiting and accelerating vehicles.	vehicles.
Greenhouse gases	No change		The route of the A40 will be longer and could carry more traffic on the additional lane. Additional traffic and increased distance to travel is likely to result in increased greenhouse gases production. The new road infrastructure will also produce embodied carbon in addition to the traffic emissions.	The route of the A40 will be longer and could carry more traffic on the additional lane. Additional traffic and increased distance to travel is likely to result in increased greenhouse gases production. The new road infrastructure will also produce embodied carbon in addition to the traffic emissions.
Landscape & visual	Minor changes would have insignificant effect on character and amenity.		<p>The bypass on the north side of the Llanddewi Velfrey ridge would have adverse landscape and visual impacts on the typical moderate and high scenic quality rural Pembrokeshire landscape to the north.</p> <p>The alignment through Ffynnon Wood would require the widening on the existing A40 embankment and the clearance of some trees.</p> <p>The parallel arrangement of roads west of Ffynnon would increase the area of landscape affected and would require the loss of hedges and pastureland as far west as Penblewin.</p>	<p>The bypass on the north side of the Llanddewi Velfrey ridge would have significant adverse landscape and visual impacts on the typical rural Pembrokeshire landscape of moderate and high scenic quality to the north.</p> <p>The alignment through Ffynnon Wood would require the widening on the existing A40 embankment and the clearance of some trees.</p> <p>The limited interventions on the A40 west of Ffynnon could require the loss of roadside hedges and trees as far west as Penblewin, although the extent would likely be less than for Option 3.</p>

Option:	1: Do Minimum	2: Public Transport Improvements	3: Highway Option A	4: Highway Option B
Impact type	Outline description of environmental effects of options			
Cultural Heritage	Minor changes would have insignificant effect on cultural heritage		<p>The option would not directly impact on any designated sites but could directly affect non-designated sites. There is a high potential that intrusive works may uncover previously unrecognised archaeological deposits. This option affects a greater area than Option 4 and so the risk of discovering unknown sites is higher.</p> <p>Designated sites: Ffynnon Chapel and the War Memorial in Llanddewi Velfrey (listed buildings) would have an improved setting with traffic moved away from the site.</p>	<p>The bypass would not directly impact on any designated sites but could affect non-designated sites. There is a high potential that intrusive works may uncover previously-unrecognised archaeological deposits. This option affects a lesser area than Option 3 and so the risk of discovering unknown sites is lower.</p> <p>Designated sites: The War Memorial in Llanddewi Velfrey (listed building) would have an improved setting with traffic moved away from the sites.</p>
Biodiversity	Minor changes would have insignificant effect on biodiversity		<p>The scheme would result in the loss and fragmentation of habitats. During construction several badger setts would be closed, and a bat roost lost in a building to be demolished. The bypass would require clearance of woodland north of Llanddewi Velfrey and trees along the existing embankment through Ffynnon Wood.</p> <p>Habitat fragmentation, would adversely affect for horseshoe bats associated with nearby Special Areas of Conservation.</p>	<p>The bypass would result in the loss and fragmentation of habitats. During construction a number of badgers setts would be closed. The bypass would require clearance of woodland north of Llanddewi Velfrey and trees along the existing embankment through Ffynnon Wood.</p> <p>Limited interventions west of Ffynnon could affect a bat roost and vegetation and cause habitat fragmentation, adversely affecting horseshoe bats associated with nearby Special Areas of Conservation.</p>

Option:	1: Do Minimum	2: Public Transport Improvements	3: Highway Option A	4: Highway Option B
Impact type	Outline description of environmental effects of options			
Water environment	No change unless road drainage were improved to reduce effects		<p>There would be a detrimental effect on the catchment geomorphology because of direct impacts of new culverts on the Afon Daulan and 2 tributaries. Existing road culverts in Ffynnon Wood would be extended.</p> <p>There would be an impact on groundwater flows where cuttings are excavated with possible adverse impact on springs within proximity.</p> <p>The new road would increase the impermeable surface which could result in increases in the rates of surface water runoff with potential flooding downstream, unless the surface water is managed appropriately with suitable attenuation of flows.</p> <p>Petrol interceptors would be needed at roundabouts.</p>	<p>There would be a detrimental effect on the catchment geomorphology because of direct impacts of new culverts on the Afon Daulan and 2 tributaries. Existing road culverts in Ffynnon Wood would be extended. There would be an impact on groundwater flows where cuttings are excavated with possible adverse impact on springs within proximity. The new road would add impermeable surface which could result in increases in the rates of surface water runoff with potential flooding downstream, unless the surface water is managed appropriately with suitable attenuation of flows.</p> <p>Petrol interceptors would be needed at roundabouts.</p>
Landuse	No change		Land would be permanently removed from agricultural use but none of this land is classified as ‘best and most versatile’. Some severance of land from farms would occur. No farm units would be made unviable.	Land would be permanently removed from agricultural use but none of this land is classified as ‘best and most versatile’. Some severance of land from farms would occur. No farm units would be made unviable.

Option:	1: Do Minimum	2: Public Transport Improvements	3: Highway Option A	4: Highway Option B
Impact type	Outline description of environmental effects of options			
Community	No change to current severance and disruption of community	No change to current severance and disruption of community, but an increase in connectivity using public transport	<p>The scheme would remove traffic from Llanddewi Velfrey and reduce existing community severance. The same benefits would improve access to community facilities in Ffynnon and residential properties on the existing A40.</p> <p>Demolition of Trefangor Cottage would be required.</p> <p>There would be improved access to regional facilities such as hospitals and shops along the improved A40.</p>	<p>The scheme would remove traffic from Llanddewi Velfrey and so reduce the existing community severance and allow improved access to facilities. These benefits would be unlikely for the community from Ffynnon west to Penblewin.</p> <p>There would be improved access to regional facilities such as hospitals and shops along the improved A40.</p>

Summary of the environmental effects that differentiate between Options 1 to 4.

- 3.3.11 Option 1 ‘Do Minimum’ would result in no changes to the current situation.
- 3.3.12 Option 2 would provide better access to public transport, with no other changes to the existing situation.
- 3.3.13 Both Option 3 and 4 would include the bypass to Llanddewi Velfrey which would have the same adverse and beneficial effects.
- 3.3.14 Option 4 would only require limited interventions on the existing A40 from Ffynnon Wood to Penblewin. The potential effects of these could include some loss of roadside trees, hedges and grassland. Option 3 would require a new carriageway from Ffynnon Wood to Penblewin, which would include the loss of field hedges, hedgerow trees and grassland in a strip separated from the existing A40 road. Option 3 would also have a greater adverse effect on severance of habitats and on protected species (bats and badger). While Option 4 would need only small areas of land take for the limited interventions, Option 3 would take greater areas of agricultural land and have a greater adverse effect on farm businesses.
- 3.3.15 Option 4 would provide community benefits by reducing community severance and improving access to and around the village of Llanddewi Velfrey; improving access to and from the settlement at Ffynnon and to properties along the existing A40, and to regional facilities further afield. Option 3 would provide benefits limited to the immediate area around Llanddewi Velfrey and to regional facilities further afield. These benefits could potentially benefit Ffynnon with improved access to Llanddewi Velfrey.