

Adran Seilwaith yr Economi  
Department for Economic Infrastructure



Llywodraeth Cymru  
Welsh Government

**THE LONDON TO FISHGUARD TRUNK ROAD (A40) (LLANDDEWI  
VELFREY TO PENBLEWIN IMPROVEMENT AND DE-TRUNKING) ORDER  
201-**

**THE LONDON TO FISHGUARD TRUNK ROAD (A40) (LLANDDEWI  
VELFREY TO PENBLEWIN IMPROVEMENT) (SIDE ROADS) ORDER 201-**

**THE WELSH MINISTERS (THE LONDON TO FISHGUARD TRUNK ROAD  
(A40) (LLANDDEWI VELFREY TO PENBLEWIN IMPROVEMENT))  
COMPULSORY PURCHASE ORDER 201-**

**PROOF OF EVIDENCE – PART C - SUMMARY**

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**WELSH GOVERNMENT, CHIEF WITNESS**

**DOCUMENT REFERENCE: WG Ref. 1.1.3**

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## 1. Personal Statement

- 1.1 My name is Mark Dixon. I am a Chartered Civil Engineer and have been the Welsh Government's Project Director with responsibility for A40 Llanddewi Velfrey to Penblewin Improvements Scheme (hereafter referred to as the Scheme) since 2019.
- 1.2 The evidence in this Proof of Evidence is true and the opinions expressed are my true and professional opinions.

## 2. Scope of Evidence

- 2.1 This summary Statement covers the background and justification for constructing the Published Scheme which is outlined in more detail in documents (WG 1.1.1) and (WG 1.1.2). In order to assist me in presenting evidence at this Public Local Inquiry, I will rely on the following Expert Witnesses to cover their respective specialist fields:
- a) Mr Philip Thiele BEng (Hons) MRes CEng MICE (Traffic and Economics) (WG1.2)
  - b) Mr Tom Edwards MEng CEng MICE MCIHT (Engineering) (WG 1.3)
  - c) Mr Andrew Sumner CMLI (Environment) (WG 1.4)
  - d) Mr Pete Wells BSc MSc MCIEEM CEnv (Ecology) (WG 1.5)
  - e) Mr David Hiller BSc MSc PhD CEng MIOA MIMMM FGS (Noise) (WG 1.6)
  - f) Mr John Davies MBE BSC MRTPI (Planning & Sustainable Development) (WG1.7).
- 2.2 I will also rely on the following proof of evidence which is contained within an appendix in Andrew Sumner's proof of evidence:
- g) Mr Tony Kernon BSc(Hons), MRICS, FBIAC (Agriculture)

### **3. Published Draft Orders**

- 3.1 Draft Orders set out the necessary rights and land needed for the Welsh Government to implement the Scheme.
- 3.2 The Environmental Statement identifies the main environmental effects of the Scheme and describes the proposed measures to avoid, remedy or reduce effects and provide environmental enhancement where practicable.
- 3.3 The draft Line Order (Doc. 2.01.01) and draft Side Roads Order (SRO) (Doc. 2.02.01) were published on 31 July 2019 and the draft Compulsory Purchase Order (CPO) (Doc. 2.03.01) was published on 07 August 2019. The objection period for all of these ended on 20 September 2019. In addition, an Environmental Statement (Doc. 3.01.01) together with a Statement to Inform an Appropriate Assessment (SIAA) (Doc. 4.6.12) was published on 31 July 2019.
- 3.4 I confirm that the Welsh Government gave notice of its intention to hold this Public Local Inquiry (PLI) and a pre-Inquiry meeting to all objectors individually on 06 November 2019 and by a notice published in the press on this date in accordance with The Highways (Inquiries Procedure) Rules 1994 (Doc. 4.01.75) and The Compulsory Purchase by Ministers (Inquiries Procedure) (Wales) Rules 2010 (Doc. 4.01.76). I confirm that a public notice which announced the details of the PLI was published on the 29 January 2020.

### **4. Background**

- 4.1 In November 2001, the National Assembly for Wales published the Transport Framework for Wales. This outlined that the east-west transport corridor in West Wales had been the subject of a multi-modal study in the 1990s, which concluded that the A40 west of St Clears was in need of improvements.

- 4.2 In March 2002, the Trunk Road Forward Programme (TRFP)<sup>1</sup> (Doc. 4.01.44) was published which included the A40 West of St Clears. The TRFP stated:

*“Improvement of the A40 trunk road, whether it be to single or dual carriageway standard, is beneficial in economic terms. Improvement to the road would not affect the number of people travelling on public transport significantly...*

*The A40 in West Wales forms the lowest standard section of the Trans European Road Network (TEN-T) in the United Kingdom and there are major problems associated with upgrading the freight carrying capacity of rail in this area which means that significant improvement in the foreseeable future is not viable...*

*We are therefore satisfied that improvement to the A40 between St Clears and Haverfordwest is needed and that economic benefits will accrue. Upgrading the road to dual carriageway standard is likely to be justified but before a decision is finally made, we need more information on the environmental implications associated with alternative standards.”*

- 4.3 A Route Options Report (ROR) (Doc. 4.02.01 and Doc. 4.02.02) was commissioned subsequently to explore single and dual carriageway options.

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<sup>1</sup> Welsh Assembly Government, Trunk Road Forward Programme 2002 (Doc. 4.01.44)

4.4 Following the findings of the appraisal within the 2004 ROR, the Welsh Government announced the publication of an update<sup>2</sup> to the 2002 TRFP (Doc. 4.01.44). The update included the following two major improvement schemes for the A40 west of St Clears:

- a) A40 Penblewin – Slebech Park improvement (completed in March 2011); and
- b) A40 Llanddewi Velfrey to Penblewin improvement (focus of the published draft Orders).

4.5 Following this announcement, a further technical study was completed in 2006, which considered two further route options along with a Wide Single (WS) 2+1 carriageway strategy instead of a single carriageway strategy.

4.6 A Preferred Route (known as a TR111 (Doc. 4.02.08)) was announced by the Welsh Government in 2010, and the 2006 Public Consultation Report was published<sup>3</sup>. The purpose of a TR111 (Doc. 4.02.08) is to protect the entire route for planning purposes under the Town and Country Planning (General Development Procedure) Order 1995.

4.7 The TR111 (Doc. 4.02.08) consisted of a combination of a northern bypass of Llanddewi Velfrey and offline improvements between Ffynnon Wood and Penblewin.

4.8 In July 2013, Edwina Hart AM CStJ MBE, Minister for Economy, Science and Transport, published a written statement outlining her priorities for Transport. The statement included the following:

*“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.”*

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<sup>2</sup> Welsh Assembly Government, Trunk Road Forward Programme 2004 Update (Doc. 4.01.44)

<sup>3</sup> Welsh Assembly Government, A40 Llanddewi Velfrey – Penblewin Improvement, Statement of Results from the Public Consultation, (February 2010) (Doc. 4.02.07)

4.9 On 12 November 2014, in providing an update on the closure of the Murco Refinery in Milford Haven, the Minister made an 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.”*

4.10 The A40 St Clears to Haverfordwest Study undertaken in 2015<sup>4</sup> (Doc. 4.02.10) considered options for improvements of the A40, assessed through the WelTAG appraisal process, included the A40 Llanddewi Velfrey to Penblewin improvement. 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.”*

4.11 In June 2015, in a written statement on the A40 Improvement Study, the Minister noted:

*“It is my intention to progress delivery of the A40 Llanddewi Velfrey to Penblewin scheme as soon as possible...”*

4.12 In February 2017, the Welsh Government appointed Carillion, with Arup and RML (the ‘Carillion Team’) as their technical and environmental advisors, to develop the design of the proposed A40 Llanddewi Velfrey to Penblewin Improvements up to the publication of draft Orders.

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<sup>4</sup> Welsh Government, A40 St Clears to Haverfordwest Study, Design Options Report, (June 2015) (Doc. 4.02.10)

4.13 Carillion entered liquidation in January 2018. The Welsh Government subsequently appointed Arup, supported by RML, to continue the development of the design up to publication of draft Orders and to support the Welsh Government through the Statutory process.

## **5. The Need for the Published Scheme**

5.1 The A40 is a route of national and international strategic importance forming part of the Trans-European Transport Network (T-ENT). At a regional and local level, it serves the county town of Haverfordwest, the tourist economy of central and north Pembrokeshire, the port of Fishguard and the industrial town of Milford Haven to the south.

5.2 The 2017 Welsh Transport Appraisal Guidance (WelTAG) study<sup>5</sup> (Doc 4.03.03 to 4.03.08) identified a range of actual and perceived problems to be addressed on the A40 between Llanddewi Velfrey and Penblewin, which were:

1. Limited and inconsistent overtaking opportunities
2. Platooning
3. The route of the A40 passes through the populated area, creating severance and air and noise pollution problems
4. Slow-moving traffic during the summer months
5. The region has lower than national average productivity levels
6. Unemployment in the region is highest in the main industrial areas of Milford Haven and Pembroke Dock
7. An absence of higher education establishments in Pembrokeshire
8. Pembrokeshire is perceived to be remote, deterring growth in the region

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<sup>5</sup> Welsh Transport Appraisal Guidance (WelTAG) Study 2017 (Doc 4.01.11)

## 6. Objectives of the Published Scheme

6.1 The Scheme objectives are:

- O1** To enhance network resilience and improve accessibility along the east-west transport corridor to key employment, community and tourism destinations;
- O2** To improve prosperity and provide better access to the county town of Haverfordwest, the Haven Enterprise Zone and the West Wales ports of Fishguard and Milford Haven;
- O3** To reduce community severance and provide health and amenity benefits;
- O4** To reduce the number and severity of collisions;
- O5** To promote active travel by cycling, horse-riding and walking to provide opportunities for healthy lifestyles;
- O6** To deliver a scheme that promotes social inclusion and integrates with the local transport network to better connect local communities to key transport hubs;
- O7** Deliver a project that is sustainable in a globally responsible Wales, taking steps to reduce or offset waste and carbon;
- O8** Give due consideration to the impact of transport on the environment and provide enhancement when practicable.

6.2 In accordance with Welsh Transport Appraisal Guidance (WelTAG 2017) (Doc 4.01.11), an objectives-led approach has been adopted. This means that a Scheme's inception starts by identifying problems and opportunities and defining what is to be achieved.

6.3 In developing the objectives, a review was undertaken against the well-being goals as presented within the Well-being of Future Generations (Wales) Act 2015 (WFGA 2015) (Doc. 4.01.10), helping to ensure that the Scheme objectives align to the wider sustainable development principle of the Welsh Government, and take into account the needs of Wales' future generations.

## **7. Description of the Published Scheme**

7.1 The Scheme would comprise a 4.3km long Wide Single (WS) 2+1 Road. This would provide two lanes in one direction and one lane in the opposite direction throughout the Scheme.

7.2 The Scheme would provide three sections of WS2+1 standard carriageway, with a total of 2.08km overtaking provision in the eastbound direction and 1.05km overtaking provision in the westbound direction. Most of the Scheme would be offline, with a section between Henllan Lodge and Ffynnon being quasi-online.

7.3 The Scheme would start at the Penblewin Roundabout until it meets the new Llanddewi Velfrey East Roundabout.

7.4 A new access road would be constructed along a part of the northern edge of the proposed trunk road, which would link the A478 with the highway leading to Trefangor, this road would provide access to the Trefangor Burial Ground, and agricultural businesses.

7.5 Travelling east from Penblewin, the new trunk road would be located north of the existing A40. Two lanes would be provided in the eastbound direction and a single lane would be provided in the westbound direction.

7.6 The existing road would be retained to provide access to existing properties located along the route. A new side road would be constructed to the south of the A40 at Henllan Lodge to link the existing A40 with the road leading south to Henllan. This would provide an

alternative route into Llanddewi Velfrey along existing roads, thereby enhancing network resilience.

- 7.7 A new underpass would be provided east of Ffynnon Chapel to enable walkers, cyclists and horse-riders to cross beneath the new trunk road. Bridleways would be provided to link the underpass with the existing side-roads to the west to enable the equestrians to continue horse-riding. Walkers and cyclists may also use these bridleways.
- 7.8 East of the proposed Ffynnon Chapel underpass, a footway / cycleway would be provided on the south side of the trunk road, to link to Llanddewi Velfrey. This would provide a safe crossing facility leading to / from the Chapel and surrounding properties.
- 7.9 East of Henllan Lodge, the new trunk road would be constructed quasi-online with the existing A40; the eastbound 2+1 overtaking section would narrow to a single lane section in advance of the proposed Llanddewi Velfrey West Junction.
- 7.10 Llanddewi Velfrey West Junction would be a staggered T-junction and would be constructed to the north of the existing A40.
- 7.11 A northern arm would provide access to Ffynnon Chapel and other properties and farms in the vicinity, whilst a new southern arm would provide access into the village of Llanddewi Velfrey.
- 7.12 The public footpath which currently runs along the existing access track to Pen-troydin-fach would be diverted.
- 7.13 East of Pen-troydin-fach, an overtaking section would be provided for westbound traffic. The road would enter a cutting and a new overbridge would be provided to allow for continuity of access along Llanfallteg Road.

7.14 Travelling east from the new overbridge at Llanfallteg Road, the overtaking provision would switch to provide eastbound overtaking until it meets the new Llanddewi Velfrey East Roundabout.

## **8. Environmental Appraisal and Mitigation**

8.1 The assessment of environmental impacts and effects of the Scheme, including consideration of the construction phase, are reported in detail in the Environmental Statement (ES) (WG Ref. 3.01.01) together with the proposed mitigation measures. A Record of Determination, which outlined the process undertaken for determining whether an Environmental Impact Assessment (EIA) is required and is included within Appendix 4.3 of the ES (Doc. 3.02.03).

## **9. Sustainable Development**

9.1 The Sustainable Development Report (Doc.4.03.09) examines the extent to which the selection and development of the Scheme adhered to the sustainable development principles set out in the WFGA 2015, concluding that the selection and design of the Scheme did accord with the five ways of working. The report also shows how the Scheme would contribute to the seven well-being goals of the WFGA 2015 and the delivery of the Welsh Government's Well-being objectives set out in Prosperity for All<sup>6</sup> (Doc. 4.01.12).

## **10. Improvements to the existing A40 (to be detrunked)**

10.1 The Line and Detrunking Order Plan (Doc. 2.01.03) shows the extents of the existing A40 trunk road that would be detrunked, with the ownership and maintenance responsibilities being transferred from Welsh Government to the local highway authority, Pembrokeshire County Council.

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<sup>6</sup> Welsh Government, Prosperity for All: the national strategy, (September 2017) (Doc. 4.01.12)

10.2 The forecast 96% reduction in traffic through Llanddewi Velfrey with the Scheme in place (Doc 4.05.03), provides opportunities to amend the highway layout through the village.

10.3 The Welsh Government sees the proposed improvements enabled by the detrunking of the existing A40 as complementary to the Scheme and draft Orders. The improvement works do not form part of the draft Orders and no land take is necessary within the CPO for the proposals. Tom Edwards describes the improvements in his evidence (WG 1.3.2).

10.4 The details and delivery mechanism of the proposed improvements to the existing A40 enabled by the detrunking will be explored further with PCC.

## **11. Construction**

11.1 Subject to the satisfactory completion of the statutory procedures, a Design and Build (D&B) contractor would be procured for the detailed design and construction of the Scheme. Construction is expected to take approximately 18 months commencing in early 2021 with completion at the end of 2022.

11.2 A Construction and Buildability Report (Doc. 4.04.09) has been prepared which provides an outline construction methodology for the Scheme, including phasing / sequencing diagrams at key interface locations.

11.3 Maximising the community benefit of major infrastructure schemes is a key requirement of the Welsh Government. The contract to be awarded for the detailed design and construction of the Scheme would include requirements for Community Benefits, and the appointed contractor would be required to maximise the impact of public spending in the local communities during construction. This would include targets for: recruitment, provision for training, apprenticeships and education, and use of a local supply chain.

## **12. Land Acquisition and Compensation**

12.1 The land-take and rights to be acquired shown in the CPO is the minimum necessary to construct, mitigate, operate and maintain the Published Scheme. Land required only during the construction phase for temporary works has been separately identified in the Welsh Government letters, which accompanied the publication of the CPO.

12.2 The provisions of the Acquisition of Land Act 1981 (Doc. 4.01.04) would apply.

## **13. Summary of Support, Objections and Representations**

13.1 The publication of draft Orders provided the opportunity for any person or organisation to object, support, or suggest alternatives to the Scheme. In summary, at the time of writing evidence:

- a) 56 unique correspondence letters or emails have been received that clearly express support for the Scheme;
- b) five unique correspondence letters or emails have been received that clearly express that the respondents do not object to the Scheme;
- c) 36 unique objections to the Scheme have been received, of which 20 have been classed as being from statutory objectors; and
- d) seven objections have since been withdrawn by the respective consultees. Three of these objectors have now expressed their support for the Scheme (which are included within the 56 stated in section a. above).

## 14. Conclusions

14.1 The Scheme is in accordance with the Welsh Government's priorities for transport, as outlined in my Statement of Case Part A - Policy Statement (WG Ref 1.1.1).

14.2 The proposals would meet the Scheme objectives and provide a highway designed to current standards, with improved safety, greater overtaking opportunities, more reliable journey times with resilience to accommodate future traffic.

14.3 The Scheme has been developed as a result of comprehensive assessment and stakeholder involvement, undertaken over the course of many years.

14.4 The Scheme improves access for people and goods along the east - west transport corridor and improves access to: the tourist economy of Pembrokeshire, the ports of Fishguard and Milford Haven, and the Haven Waterway Enterprise Zone.

14.5 The Scheme addresses the problems identified as part of a WelTAG Study (Doc. 4.03.03 to Doc. 4.03.08), and best meets the objectives set out as a result of that study: it improves the performance of the A40 as a TEN-T route and improve the resilience of the trunk road network in south Wales.”

14.6 The ES (Doc. 3.01.01) highlights adverse and beneficial impacts and residual effects associated with the Scheme under a number of environmental topic headings. It also describes how any adverse effects would be mitigated through works integrated into the Scheme. These include: new areas of woodland planting, the provision of landscaping bunds and measures to mitigate the ecological impact.

14.7 All objections have been considered and responses presented on each point raised. Welsh Government have, where practicable, taken steps to mitigate impacts.

14.8 Whilst the Welsh Government recognises that the Scheme would have an impact on people's right to land / property, this needs to be considered against the local and regional benefits that the Scheme would deliver which are in the wider public interest.

14.9 At the PLI, the Welsh Government will invite the Inspector to consider this Statement of Case and those of the Expert Witnesses and to recommend to the Minister for Economy and Transport that the published Line, Side Roads and Compulsory Purchase Orders are made, taking into account the corrections and modifications presented at the Inquiry.

14.10 As set out in my Proof of Evidence, and as set out in the Proof of Evidence of my expert witnesses, the Welsh Government considers that there is no impediment to the Scheme being implemented.