

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-**

**SUMMARY PROOF OF EVIDENCE**

**JOHN DAVIES MBE, BSC, MRTPI**

**WELSH GOVERNMENT: PLANNING AND SUSTAINABLE DEVELOPMENT**

**DOCUMENT REFERENCE: WG 1.7.1**

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## **1. Author**

- 1.1 My name is John Davies. I am currently employed by MG Consulting Ltd.
- 1.2 I have been a Member of the Royal Town Planning Institute since 1982. As a Member of the Institute I must abide by its Code of Professional Conduct, which sets out the standards, ethics and professional behaviour expected of Members.
- 1.3 I am part of the team responsible for the delivery of the A40 Llanddewi Velfrey to Penblewin Improvement Scheme, acting as expert witness on matters relating to planning and sustainable development. The evidence which I provide in this summary proof is true and has been prepared and is given in accordance with the guidance of my professional institution. I confirm that the opinions expressed are my true and professional opinions.

## **2. Scope and Purpose of this Proof of evidence**

- 2.1 My evidence deals with sustainable development and planning policy. Sustainable development is defined by the Well-being of Future Generations (Wales) Act 2015 (the WFG Act) as the process of improving the economic, social, environmental and cultural well-being of Wales by taking action in accordance with the sustainable development principle aimed at achieving the 7 well-being goals in Section 4 of the Act. My evidence therefore examines whether the Scheme has been developed in accordance with the sustainable development principle and the extent to which it would contribute to the 7 well-being goals.
- 2.2 Section 10(2) of the Highways Act 1980 requires the Welsh Ministers, when considering proposals to construct a new trunk road, to give due consideration to the requirements of local and national planning, including the requirements of agriculture. The relevant statements of national planning policy are in Planning Policy Wales Edition 10

(PPW10), published in December 2018. I examine the Scheme's impact in the light of the policies in PPW10, including that relating to agriculture.

### **3. Sustainable Development**

- 3.1 In view of the fact that WelTAG 2017 incorporates the principles of the WFG Act, the Scheme was in my view selected and developed in accordance with sustainable development principles. It was identified and developed following the principles of thinking long term, integration, involvement, collaboration and prevention. The Welsh Government hence has acted in accordance with the sustainable development principle as defined in Section 5(2) of the WFG Act.
- 3.2 The Scheme would make positive contributions to 9 of the Welsh Government's 12 well-being objectives and to several local objectives. However, with regard to national well-being Objective 3: *Drive sustainable growth and combat climate change* there would be the potential for an adverse impact in respect of carbon emissions and climate change.
- 3.3 The Scheme would result in an 8.4% increase in total emissions compared with the Do Minimum scenario. However it would make positive contributions to the Welsh Government's well-being objectives and hence national goals through improved road safety; increased network resilience; reduced community severance and noise impact, and improved air quality. The Scheme would hence overall make a significant contribution to achievement of the national well-being goals and would hence be part of the 'process' of improving well-being that amounts to sustainable development as defined in the WFG Act.

### **4. The Requirements of Planning**

- 4.1 The Scheme would deliver a number of the National Sustainable Placemaking Outcomes defined in PPW 10. These include making best use of resources; fostering economic activity; enabling easy

communication; producing a safe and inclusive environment in Llanddewi Velfrey; promoting physical and mental health and well-being; and better conditions for active travel.

- 4.2 PPW10 defines 3 place-related themes aimed at sustaining or creating sustainable places and delivering the national sustainable placemaking outcomes. The first of these is 'active and social places' and in my opinion because of the Scheme's importance as part of the Welsh Government's national transport programme, its inclusion in the Pembroke LDP and the benefits to the village of Llanddewi Velfrey, it accords with PPW10 policies related to this theme.
- 4.3 The second theme is 'productive and enterprising places'. The Scheme accords with the objectives of PPW10 for the use of material resources, particularly an earthworks balance. It would produce benefits including highway safety and journey reliability; for the local economy and tourism; reduced air pollution, noise and community severance, and improved opportunities for active travel in Llanddewi Velfrey. I therefore consider that the Scheme meets the objectives of PPW10 that seek to achieve active and social places.
- 4.4 The third theme is 'distinctive and natural places', which includes the historic environment, landscape, biodiversity and airborne pollution. It seeks to achieve well-being objective 7: 'A Globally Responsible Wales' by reducing carbon emissions, addressing airborne pollution and managing environmental risks. This Scheme would increase emissions, but this does not undermine the overall thrust of Welsh Government policy, since emissions on this single infrastructure project must be seen in the overall context of Government action aimed at reducing emissions.
- 4.5 There would be no physical impact on any listed buildings or scheduled ancient monuments (SAM). There would be minor beneficial effects for 2 SAMs and no significant impact on the setting of 2 SAMs and 5 other listed buildings. I therefore consider that the Scheme meets the policy objectives of PPW10 in respect of the historic environment.

- 4.6 There would be no significant effect on 14 of the Landscape Character Areas (LCA). The extensive landscaping and hedge planting included in the Scheme would reduce the impact on the 2 affected LCAs to moderate by the summer of the design year. There would be an adverse effect on some rights of way and properties, whilst others would benefit, particularly to the south of the new road. However, significant residual adverse visual effects would remain. I therefore consider that the landscape impact of the Scheme conflicts with PPW10 objectives.
- 4.7 Turning to biodiversity and protected species, the SIAA concluded that there would not be an adverse effect on the integrity of the European Sites considered. The Protected Species Conservation Strategy contains modified mitigation proposals to respond to the concerns of Natural Resources Wales (NRW). I am satisfied that the Scheme's design and revised mitigation proposals meet the requirements of Section 6 of the Environment (Wales) Act 2016 and the requirements of PPW10 paragraph 6.4.4, by taking all reasonable steps to maintain and enhance biodiversity and promote the resilience of ecosystems.
- 4.8 There is no objection from NRW to the removal of woodland. The loss of some areas of Restored Ancient Woodland must be balanced against the significant public benefits including highway safety, network resilience, reduction in community severance, noise and air pollution in Llanddewi Velfrey. I consider that the Scheme accords with the policy advice in PPW10 paragraph 6.4.26 regarding woodland.
- 4.9 A considerable number of dwellings and people living close to the existing A40 would benefit from improved air quality and reduced noise levels due to the Scheme. I therefore consider that it accords with the PPW10 objective of reducing average population exposure to air and noise pollution.
- 4.10 Because it would not affect any land classed as the best and most versatile, and the viability of no farm holding would be threatened, the Scheme is in line with PPW10.

4.11 Paragraph 5.3.4 of PPW10 states

*Where no other alternative routes or options are practicable, transport infrastructure schemes should provide mitigation measures to minimise the negative impacts and enhance the positive ones..... including reducing exposure to airborne pollution.*

4.12 All options were considered during the investigation of possible solutions to the identified problems on this section of the A40, which included a full WelTAG 2017 assessment embedding the principles of the WFG Act. This led to the identification of this Scheme as the preferred solution. The route has been developed to avoid its adverse effects and mitigation has been designed to minimise the Scheme's negative impacts where avoidance is not possible. The Scheme would enhance living conditions for people living in Llanddewi Velfrey, reducing community severance, air and noise pollution. I therefore consider that the Scheme accords with PPW10 policies for transport infrastructure projects.

4.13 The National Development Framework (NDF) was published in draft for consultation in 2019. By improving access to the Haven Towns, and reducing community severance and noise and improving air quality in Llanddewi Velfrey, the Scheme would be in line with the strategic policies and objectives of the emerging NDF.

## **5. Conclusions**

5.1 I conclude that the Scheme has been developed in accordance with the sustainable development principle. The Scheme would make a significant contribution to achievement of the national well-being goals and would hence be part of the 'process' of improving well-being that amounts to sustainable development as defined in the WFG Act.

5.2 Turning to the requirements of planning, the Scheme satisfies some of the wide range of policies in PPW10 but conflicts with others. It is therefore necessary to come to a balanced view, weighing the benefits against adverse impacts. Paragraph 2.24 of PPW10 advises that the

social, economic, environmental and cultural benefits are considered in the decision-making process.

- 5.3 In this case there are benefits to highway safety and journey reliability, and potential benefits to the local economy and to tourism, all of which attract considerable weight. I attach great weight to the benefits to the residents of Llanddewi Velfrey though reduced community severance, air pollution and traffic noise, improved opportunities for active travel and the opportunity to create a safer environment.
- 5.4 Against these benefits must be set the long term impact on the landscape, NRW's concerns regarding the effectiveness of mitigation for protected species, and the increased emissions. The extensive landscaping measures would reduce the long term impact on the 2 affected LCAs to moderate, whilst 14 LCAs would not be significantly affected. The mitigation measures for protected species have been carefully designed to respond to the concerns of NRW and to overcome those concerns wherever possible. For these reasons I attach limited weight to the landscape and potential biodiversity impacts. The increase in emissions must be weighed in the context of the Welsh Government's actions across all its areas of responsibility, including transport, aimed at reducing emissions in Wales and tackling climate change.
- 5.5 On balance I conclude that the social, economic, environmental and cultural benefits resulting from this Scheme, which are supported by robust evidence, outweigh its limited adverse impacts. I conclude overall on the requirements of planning that the Scheme accords with national planning policies in PPW10 and the emerging policies of the NDF.