

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

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WELSH GOVERNMENT, Environment

DOCUMENT REFERENCE: WG 1.4.1.

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1. Author

- 1.1 I am Andrew Sumner, a Chartered Landscape Architect with 38 years of experience. I qualified in 1981 in Landscape Architecture and gained professional membership of the Landscape Institute in 1987.
- 1.2 My highways experience includes 11 Welsh trunk road projects on which I was Landscape Architect, or Environmental Coordinator. My role in the A40 project is Environmental Coordinator.
- 1.3 My Proof of Evidence (PoE) is an overview of the environmental aspects of the Scheme, setting out proposed environmental mitigation and requirements for compulsory purchase of land for that purpose.

Links to other proofs

- 1.4 I rely on the following experts witnesses to cover their respective specialist fields: Philip Thiele, Tom Edwards, Peter Wells, David Hiller and John Davies. Tony Kernon has prepared a PoE and this is included in Appendix 1 of my main PoE.

2. Environmental Impact Assessment process

- 2.1 An Environmental Impact Assessment (EIA) has been completed in accordance with:
 - a) EIA Directive EC2014/52/EU (amended the 2011 Directive 2011/92/EU).
 - b) The Harbours, Docks, Piers and Ferries Environmental Protection - The Environmental Impact Assessment (Miscellaneous Amendments Relating to Harbours, Highways and Transport) Regulations 2017 which transposes the 2014 Directive for projects under the Highways Act.
- 2.2 We have carried out the EIA Screening process which confirmed the Scheme was an Annex II project and was subject to Determination by

Welsh Ministers. The Screening and Scoping Reports are included in ES Appendix 4.1 and 4.2. An Environmental Statement (ES) was published in 2019. The Design Manual for Roads and Bridges (DMRB) Volume 11 and guidance published by professional bodies applies to the assessments undertaken. In accordance with the 2014 EU Directive we included assessments of Population and Human Health and Climate Change.

- 2.3 Consultations with the public and with Statutory Environmental Bodies (SEB) have been carried out and we have held regular meetings with an Environmental Liaison Group and held Public Information Exhibitions. We have also consulted the Design Commission for Wales.

Description of the setting

- 2.4 The scheme lies between Carmarthen and Haverfordwest with the Preseli Hills lie to the north and Carmarthen Bay to the south. Pembrokeshire Coast National Park (PCNP) lies to the south and west.
- 2.5 The Scheme lies in the rural, lowland agricultural setting of east Pembrokeshire with a dispersed population in individual agricultural holdings and small settlements. The land is rolling in character and fields are enclosed with hedges/hedge-banks with areas of woodland along watercourses and on steeper slopes. The existing A40 follows a route on more elevated ground by following a series of ridges. At Llanddewi Velfrey it follows the crest of a ridge with steep slopes falling to north and south. Further west, the A40 passes through an area of more gently undulating farmland. The modern village of Llanddewi Velfrey developed along the A40.
- 2.6 There are five SACs within 10km of the proposed Scheme and two designated for bats within 30km. The habitats along the route support populations of European Protected Species (EPS). Peter Wells addresses nature conservation in his PoE.

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- 2.7 There are Listed Buildings (LB), in the setting with prehistory Scheduled Ancient Monuments (SAM) located on higher ground. There are also a wide range of archaeological sites on the Historic Environment Record (HER).
- 2.8 The area receives a maritime climate characterised by cloudy, wet and windy, but mild weather. Air quality is good. Llanddewi Velfrey is a Noise Action Plan Priority Area.

3. The Environmental Impact Assessment process

Environmental Surveys

- 3.1 Environmental surveys have been completed between 2016 and 2019. Field work was guided by desk studies and was agreed with the SEBs.
- 3.2 Ecology surveys for badger, bats, birds, dormouse, great crested newt, otter, water vole, reptile and vegetation have been completed. Water resources, landscape, noise, air quality, trees, archaeological walk over and agricultural and farm surveys were completed between 2017 and 2019, with a geophysical survey completed in 2017. A ground investigation was carried out in 2016. Public Rights of Way usage was surveyed in 2017 and road traffic data obtained from Welsh Government and Dyfed Powys Police. Surveys and desk studies form the baseline for the EIA.

Environmental mitigation

- 3.3 Mitigation to avoid, prevent, reduce, remedy or offset the effects of the Scheme is proposed that is integral to the design of the published scheme and Welsh Government is fully committed to these. The land required for these measures is essential and is mainly included in the Compulsory Purchase Order (CPO) as 'Title', but some further land is included as 'Title Essential for mitigation'.

Appropriate assessment

- 3.4 A Statement to Inform an Appropriate Assessment (SIAA) has been prepared and is addressed in the PoE of Peter Wells.

Environmental Impact Assessment (EIA)

- 3.5 The project team developed the EIA in accordance with the scoping report, following accepted methods and guidance. The topics covered are set out in DMRB Volume 11 (2008), supplemented with Climate Change and Population and Human Health. The assessments were incorporated in the ES as chapters, appendices and figures.
- 3.6 The ES conclusion states that the Scheme would provide an improved trunk road and the volume of traffic through Llanddewi Velfrey would be substantially reduced, making walking around the village safer. Side roads and cycleways would provide local access to properties, farms and fields, with safer, more attractive routes for cyclists, walkers and horse riders.
- 3.7 The EIA determined that there would be both beneficial and adverse impacts on the local environment as a result of the Scheme. Where adverse impacts were identified, these are mitigated as part of the design.
- 3.8 Mitigation measures were developed in collaboration with the SEBs, landowners and other key stakeholders. The ES concluded that there would be no significant cumulative effects in combination with other proposed developments in the area.

Environmental management for construction

- 3.9 A Pre-Construction Environmental Management Plan (PreCEMP) has been prepared (ES Appendix 2.2) to be operated by the future Design & Build (D&B) contractor. This sets out commitments to further surveys, mitigation and monitoring that are made in the ES and must be carried through to detailed design, construction and routine maintenance. It also

sets out how construction and operation of the scheme must be compliant with environmental legislation and the conditions of any formal approvals, consents, permits and licences.

3.10 The PreCEMP includes:

- a) A Register of Environmental Actions and Commitments
- b) Method Statements demonstrating a commitment to minimising environmental impacts during construction and to completing proposed environmental mitigation.
- c) Environmental Masterplan (ES Appendix 2.5)

4. Preliminary design of the Scheme

4.1 In 2016 Carillion, with Arup and RML were commissioned to develop the preferred route under an Early Contractor Involvement contract. Arup and RML continue the design through KS3 and 4 following the demise of Carillion.

4.2 The environmental surveys identified constraints that have influence preliminary design and the development of mitigation such as human settlement, topography, water, habitat, traffic noise and landscape and historic assets. In my full PoE I describe the alignment design to avoid or reduce impacts. I then set out the design approach to the proposed mitigation of remaining environmental impacts.

5. Land taken for essential mitigation

5.1 The environmental mitigation scheme was designed to minimise additional land take over and above the land required for engineering purposes. Examples of additional land required include:

- a) Environmental fencing, excluding badger and otter from the carriageway, sometimes forms the permanent boundary to the scheme and Welsh Government require the right to enter the land for fence maintenance.

- b) Surveys have shown that dormouse are present and any dormouse habitat that is cleared for construction must be replaced at a ratio of 2 to 1. The land required for this is mainly within 'Title' land, but some further plots, generally narrow strips or severed field corners, are taken as essential mitigation.

5.2 Plots of essential mitigation (grouped here in brackets to show geographical groupings are (1/2d) (1/2j & 1/2k) (1/2x, 1/3a, 1/3d) (2/2e & 2/2g) (2/3b, 2/3d, 2/3f, 2/3h) (2/8a & 2/8c) (2/8g, 2/8h, Plot 2/8k & 2/9a) (2/8g & 2/8j) (2/9d) (3/3d) (3/2j) (3/4b & 3/4e) (3/3g & 3/3m) (3/3y, 3/3ab, 3/6d, 3/6e) (Additional Plot north of Plot 3/4k) (3/3ae, 3/3af, 3/6j & 3/6k) (3/4r).

6. Objections to the Scheme

6.1 I address environmental aspects of objections to the Scheme from:

- a) Woodland Trust (regarding Ancient Woodland)
- b) Natural Resources Wales (Protected Species)
- c) Mr and Mrs Peett (adverse effects on their property)
- d) Mr Cullingford (damage to the environment, climate change, farming, natural resources)
- e) Ms Rowlands (as above)
- f) Sally Amooore (adverse effects on farmland)

7. Conclusion

7.1 My PoE includes facts which I regard as relevant to my expressed opinions. The Inquiry's attention has been drawn to any matter which would affect the validity of that opinion.

- 7.2 I have overseen the environmental design process and sought, with the engineering and environmental specialists in the team. In my opinion the proposed measures to minimise overall environmental impacts and to optimise the effectiveness of proposed mitigation are effective, justifiable and achievable within the proposed CPO.
- 7.3 In my opinion the Environmental Impact Assessment, the Appropriate Assessment have been carried out and published in accordance with legislation and professional guidance.
- 7.4 I believe the facts I have stated in this Proof of Evidence are true and that the opinions expressed are correct.
- 7.5 I understand my duty to the Inquiry to assist it with matters within my expertise and believe that I have complied with that duty.