

Pembrokeshire Friends of the Earth

Objections to the Proposed Llandewi Bypass on the A40 Trunk Road

Introduction

Over a great number of years Pembrokeshire Friends of the Earth has supported limited improvements of the A40 trunk route such as the Robeston Wathen bypass, while fighting the dualling of this road. We acknowledge that for many of the residents of Llandewi Velfrey the bypassing of the village will be a welcome development. However, there are a number of aspects of the current scheme which we do object to.

Objections

The Climate Emergency

The Welsh Government and both Pembrokeshire and Carmarthenshire County Councils have acknowledged that we are facing a climate emergency and that in order to protect the world from catastrophic warming we must act now.

The development of this scheme, including the most-recent studies, was undertaken prior to the Welsh Government's declaration of a climate emergency on 29th April 2019¹. We believe the scheme should be reassessed in the light of the recognised crisis.

As Lesley Griffiths, Minister for Environment, Energy and Rural Affairs, said of this fundamental announcement "Our sustainable development and environmental legislation is already recognised as world leading and now we must use that legislation to set a new pace of change." The A40 'improvement' proposals have remained largely unchanged for the last two decades. Is now not the time to change?

This scheme is estimated to increase CO2 emissions from traffic by 8%. The WelTAG assessment criteria demonstrates that the scheme would have a 'moderate adverse' greenhouse gas impact (Doc. 4.03.07 paragraph 4.2.2).

It will also result in increased CO2 emissions by impacting on mature woodland and in the construction. It will also increase the speed of traffic resulting in worsening levels of noise and exhaust fumes reducing air quality.

Future Generations Act

The WelTAG Stage 3 Report (Doc. 4.03.07) paragraphs 3.11.10-12 and 4.8.4 highlight that scheme objectives 7 and 8 are aligned with well-being goal 7 ("A globally responsible Wales") of the Well-Being of Future Generations Act. None of the other scheme objectives align with this well-being goal. The table in paragraph 4.7.2 of the same report assesses the scheme as not meeting either of these objectives. Therefore, the scheme is not compatible with the aim to be a globally responsible Wales as it fails to attain well-being goal 7.

¹ <https://gov.wales/welsh-government-makes-climate-emergency-declaration>

We believe that the Welsh Government is due to publish a new transport strategy and we suggest that this scheme is likely to go beyond the road improvements envisioned by this.

The Cost of the Scheme

Philip Thiele's summary evidence to the inquiry states that "The economic case for the Scheme indicates poor value for money." (Doc. 1.2.1 - paragraph 8.3).

Friends of the Earth believe that money spent on this scheme would be better used improving local transport services, including the bus and train network. We note that the need for eastbound buses (turning right into Llanddewi Velfrey) to cross westbound A40 traffic may impact on journey times and reliability.

In the Transport Sector Emission Pathway: factsheet², published as part of 'Prosperity for all: a low carbon Wales' it is stated that the Welsh Government intends transport sector emissions to reduce by 43% by 2030. Their policies to achieve this include:

- behavioural change (modal shift to more sustainable travel),
- increased travel by rail,
- increased travel by bus,
- reduced need to travel.

To date little consideration has been given to public transport in relation to the scheme. The 2018 WelTAG Stage 1 Impact Assessment Report (Doc. 4.03.04) ignored the potential for rail improvements (paragraph 4.4.22) due to the lack of stations within their study area. However, figure 4 shows that the majority of the traffic through Llanddewi Velfrey originates in Haverfordwest, Fishguard or Milford Haven. All three towns have rail links to Carmarthen, Swansea and beyond which are major destinations.

Journey Times

Improving journey times is given as a significant advantage of the scheme. However according to the 2019 WelTAG Stage 3 report, the time saving would only be around 30 seconds (Doc. 4.03.07 - paragraph 1.5.9). And Doc. 4.02.10 - A40 St. Clears to Haverfordwest study, Design Options Report volume 1 - paragraph 4.7.3 states that "The scheme would deliver small improvements to journey times, journey time reliability and road safety".

We also believe that any improvement is very likely to be offset by increased congestion at Haverfordwest and Carmarthen. This congestion will impact air quality in these more built up areas. By promoting the use of road transport, such schemes also result in increased congestion and this is, as noted above, at a time when the Welsh Government own policy is to reduce road building and "to require the use of a sustainable transport hierarchy in relation to new development".

Safety

² <https://gov.wales/sites/default/files/publications/2019-06/transport-sector-emission-pathway-factsheet.pdf>

The safety of other road users has been cited as another major advantage of the scheme. However we would argue that there are a number of ways to achieve this without building a completely new three lane road from Gwyndy to Penblewin.

Friends of the Earth would support measures to improve safety and stress that we believe the money should be reallocated to improving local connectivity, safe routes for cycles and pedestrians and public transport. This would include a safe crossing at Llandewi with widening of pavements and traffic calming measures.

In particular there appears to be no justification for the section from Capel Ffynnon to Penblewin.

Both of the options presented for this section at the public consultation³ conducted in 2006 failed to attract majority public support. As a result, there is no evidence that the public supports an offline improvement for this section. This was further clarified in the 2019 WelTAG Stage 3 Report which stated that "no clear preference emerged for either the Purple or Orange routes." (Doc. 4.03.07 - paragraph 3.12.20)

This section of the scheme does not contribute to objective 3 - "to reduce community severance and provide health and amenity benefits" since the section of road it would replace is outside the village of Llanddewi Velfrey.

The Ffynnon Wood to Penblewin section therefore provides little benefit other than insignificant time savings for motorists at a very considerable financial and environmental cost.

Environmental Impact

The WebTAG assessment criteria (Doc. 4.03.07 - paragraph 4.2.2) illustrates that the proposed scheme performs poorly with regard to environmental aspects. Of the eight criteria, only three score 'Slight Beneficial' with the remainder highlighted as negative impacts. This means that improvements to noise and air quality, despite moving the trunk road further from the village, would be minor.

The expected transition to electric vehicles would reduce noise and air pollution regardless of whether the scheme goes ahead.

The 2006 consultation¹ found, in response to question 2 (regarding problems with the existing A40), that the effect of traffic noise and vibration were considered to be of "least concern" among the issues raised.

Aside from the increase in emissions the new road scheme will result in a significant impact on ancient woodland, it will impact negatively on a number of farms in the area and there is concern regarding its impact on a number of nationally and internationally important species including bats and otters.

³ <https://gov.wales/sites/default/files/publications/2017-09/a40-llanddewi-velfrey-to-penblewin-statement-of-results-from-public-consultation-2006.pdf>