



James Cullingford

Your Ref: N/A
Our Ref: qA1316455 / R0058
Date: 12 February 2020

Dear Mr Cullingford

A40 LLANDDEWI VELFREY TO PENBLEWIN IMPROVEMENTS

I refer to your correspondence dated 17 September 2019 in relation to the draft Statutory Orders associated with the Welsh Government's proposals for the A40 Llanddewi Velfrey to Penblewin ("the Scheme").

All correspondence is classified as either an objection or a statement of support. Due to the contents of your correspondence, it has been classified as an objection to the draft Statutory Orders. I understand your objection to be based on the following:

1. The justification for building the Scheme is weak. Specifically, the Scheme would not address road safety.
2. The Scheme will have an impact on climate change, would damage the environment (including visual impact), would impact on the farming community, and the need to protect natural resource.
3. Funding for this Scheme should be used on other areas of the trunk road network, e.g. the M4 at Newport, Cardiff or Port Talbot
4. Alternative solutions to road traffic should be utilised, e.g. shipping and cheaper rail transport.
5. Similar schemes would not be acceptable in other areas such as areas of pristine landscape and National Parks.

I shall address each of the above points below:

1. **The justification for building the Scheme is weak. Specifically, the Scheme would not address road safety;**
 - 1.1 The A40 trunk road forms part of the Trans-European Transport Network (TEN-T) and is a strategically important link between the national motorway network and the West Wales ports including Milford Haven, Fishguard and Pembroke Dock. There are existing and planned strategic developments that rely on the efficient movement of people and goods, including the Haven Waterway Enterprise Zone.
 - 1.2 Despite this, the section of the A40 between St. Clears and Haverfordwest has previously been described as “*one of the lowest standard sections of the TEN-T in the UK*”. The A40 St Clears to Haverfordwest Economic Activity & Location Impacts (EALI) Study 2015 found that Pembrokeshire generally suffers from lower than average levels of productivity and that the County has been disproportionately impacted by the recession and is lagging behind the rest of Wales in terms of its recovery. As part of this study, business surveys raised concerns about poor journey time reliability, vehicle platooning and lack of safe overtaking opportunities. Stakeholder engagement has confirmed that improvements to the A40 are essential to reduce isolation, increase tourism and connectivity to employment opportunities. Local public exhibitions have also helped local people express concerns about the need for improving local walking, cycling and equestrian connections.
 - 1.3 The A40 accommodates a mix of traffic types, with seasonal variations. The A40 is a main route for the agriculture sector and this does present problems with tractors moving between fields, tractors towing trailers and the movement of agricultural produce and livestock on the highway. There are numerous side road junctions and a high number of direct accesses to property and fields.
 - 1.4 Journey times along the A40 are on average between 15 and 17% higher during daytime hours than during night time hours. A key contributory factor to this increase in journey times during daytime hours are slow-moving vehicles and a lack of safe overtaking opportunities.
 - 1.5 In the summer months, the traffic mix is supplemented by a higher volume of tourist traffic (increasing by over 50% compared to winter months) including cars and caravans. This contributes to the identified lack of journey time reliability and safe overtaking problems.
 - 1.6 More locally, the St Clears to Haverfordwest section of the A40 has developed to connect small villages and as such, many sections of the A40 pass through these communities, leading to issues around community severance, air and noise pollution concerns as well as perceived safety problems.
 - 1.7 The strategic need for improvements to the A40 in West Wales has been made clear in national policy documents since the 2002 Trunk Road Forward Programme. That document - and its updates - have identified the strategic need for improvements on the A40 west of St Clears and the project has received continued ministerial support ever since. The Llanddewi Velfrey to Penblewin Improvements Scheme is also specifically identified at the national level as part of the National Transport Finance Plan and at the local level within the adopted Pembrokeshire Local Development Plan (LDP). Further detail on the policy and legislative context is provided within Part A of the Statement of Case (<https://media.a40lvp->

- 1.8 Reducing the number and severity of collisions is one of a number of objectives that the Scheme seeks to address.
 - 1.9 Personal injury accident data along the A40 corridor, obtained from police records, has been reviewed as part of the Scheme appraisal. Between 2006 and 2015, which were the 10 most recent years of accident data available at the time of the scheme appraisal, 9 accidents occurred on the section of A40 through Llanddewi Velfrey and a further 13 accidents occurred between Llanddewi Velfrey and Penblewin Roundabout.
 - 1.10 The A40 between Robeston Wathen and Slebech Park has already been upgraded to the wide single 2+1 road standard (WS 2+1) proposed for this Scheme. Sections that have been upgraded to WS2+1 standard provide more safe overtaking opportunities than single carriageway roads. This results in a lower accident rate on WS2+1 roads.
 - 1.11 Between Haverfordwest and St Clears the accident rate for WS2+1 roads with 50 / 60mph speed limit is 36% lower than the equivalent accident rate for single carriageway roads with the same speed limit. The accident rate for WS2+1 roads compares even more favourably against single carriageway roads with 30 / 40 mph speed limits. The WS2+1 accident rate is 52% lower in this comparison.
 - 1.12 The Scheme would remove the vast majority of traffic from the village of Llanddewi Velfrey, thereby creating a safer environment within the village. The removal of traffic would provide the opportunity to widen footpaths through the village and make walking, cycling and horse-riding a more attractive proposition for trips within the village.
- 2. The Scheme will have an impact on climate change, would damage the environment (including visual impact), would impact on the farming community, and the need to protect natural resource;**
- 2.1 Chapter 19 of the Environmental Statement (ES) outlines the climate change assessments undertaken for the Scheme. The conclusion of the assessment indicates that there will be an increase in carbon emissions as a result of the Scheme. In the first year of Scheme operation, user emissions would be equivalent to approximately 0.1% of the current annual emissions from the transport sector in Wales.
 - 2.2 Whilst there is an increase in carbon emissions as a result of this Scheme, the Welsh Government is taking action across all areas for which it has responsibility to meet its ambitions to tackle climate change. *Prosperity for All: A Low Carbon Wales*, published in March 2019 contains 100 policies and proposals spread across all the Welsh Government ministerial portfolios. The Government's 2020-2021 budget allocates £140m to support initiatives aimed at decarbonising transport.
 - 2.3 Chapter 9 of the ES outlines the assessment of the Scheme on the landscape and visual impact, as well as the proposed mitigation measures that will form part of the Scheme. The extensive landscaping measures would reduce the long term impact on 2 of the affected landscape character areas (LCA) to moderate, whilst 14 LCAs would not be significantly affected. Chapter 9 of the ES provides further detail on the

landscape and visual effects. The significant benefits of the Scheme outweigh its adverse impacts.

- 2.4 Chapter 12 of the ES outlines the assessment undertaken for the impact on agricultural community and private assets.
 - 2.5 In summary, the Scheme will involve the permanent loss of approximately 27.4ha of agricultural land. None of this is shown to be of the best and most versatile agricultural quality. This is an impact of slight magnitude on a resource of medium sensitivity, leading to an overall impact of minor adverse significance.
 - 2.6 There are seven farms affected. All will experience significant changes in day-to-day operations, but the viability and continued function of the holdings is not threatened. The effect on these farm holdings has been assessed to be of minor adverse significance.
- 3. Funding for this Scheme should be used on other areas of the trunk road network e.g. the M4 at Newport, Cardiff or Port Talbot;**
- 3.1 Capital costs will be funded jointly, by the Welsh Government and the European Regional Development Fund (ERDF). Following the acceptance of a Business Case for the Scheme, the Welsh European Funding Office (WEFO) have confirmed that ERDF funding for the scheme is secured, and that the UK's withdrawal from the European Union does not impact on this funding.
 - 3.2 Rules which dictate how ERDF funding is spent mean that only schemes in specific areas qualify for this funding. The A40 through Llanddewi Velfrey qualifies for this spending as the Scheme is located within an area classed as one of the most deprived in the European Union. Other areas of Wales, such as Cardiff, Newport and Port Talbot, do not qualify for ERDF funding. As such, the WEFO / ERDF funding could not be spent on other schemes noted in your objection letter, namely the M4 Corridor around Newport, Cardiff or Port Talbot.
- 4. Alternative solutions to road traffic should be utilised e.g. shipping and cheaper rail transport;**
- 4.1 In 2002, the A40 St Clears to Haverfordwest Multi-modal Corridor Study was carried out considering public transport improvements including rail, bus, freight and integrated bus and rail. However, it was concluded that the costs associated with enhanced passenger services were likely to exceed revenue, thus requiring an operating subsidy. It was also acknowledged that improvements to public transport would not reduce the amount of traffic on the A40 trunk road.
 - 4.2 A public transport option was also considered during the WeITAG Stage 1 appraisal section of this study. However public transport was not considered to address the problems sufficiently or meet the objectives. It was also concluded that a subsidy would still be required from the Welsh Government to improve bus services within the study area.
 - 4.3 Improved shipping routes would also not resolve many of the problems identified within this study, as set out below. The published Scheme is the one that best address the identified problems, which are:

- i. Limited and inconsistent overtaking opportunities, which leads to journey time unreliability, driver frustration and associated risky manoeuvres with severe collision incidents;
- ii. Platooning when there are convoys of heavy goods vehicles from the ferry ports and slow-moving agricultural vehicles accessing the many side roads and farm accesses along the A40 contribute to journey time unreliability when combined with the limited overtaking opportunities and mix of local and HGV traffic;
- iii. The route of the A40 passes through the populated area, creating severance, air and noise pollution problems within the local community at Llanddewi Velfrey;
- iv. Slow-moving traffic during the summer months exacerbates the problems with tourists causing a significant increase in traffic and slow-moving vehicles including caravans.
- v. The region has lower than national average productivity levels and was disproportionately impacted by the recession in light of its reliance (compared to the national averages) on tourism, public administration, wholesale and retail (including agriculture), manufacturing and construction industries;
- vi. Unemployment in the region is highest in the main industrial areas of Milford Haven and Pembroke Dock, which have the lowest levels of attainment reflecting the wider socio-economic profiles of these areas;
- vii. The absence of higher education establishments in Pembrokeshire means that prospective students have to leave the County to study; and
- viii. Pembrokeshire is perceived to be remote, deterring inward investment, tourism and the development of the travel-to-work market within the Swansea Bay City Region.

5. Similar schemes would not be acceptable in other areas such as areas of pristine landscape and National Parks;

- 5.1 Chapter 9 (Landscape and Visual Effects) of the ES considers the impacts on the landscape and view in more detail.
- 5.2 Welsh Trunk Road improvement schemes are carried out to address economic, road safety, social and other matters. If a scheme is justifiable, the route and the design will be considered with equal care and consideration whether it is within or outside a National Park or Area of Outstanding Natural Beauty. For example, trunk road improvements have been successfully completed along the A470 within Snowdonia National Park.
- 5.3 While modern trunk roads are often wider and have a more strictly defined vertical and horizontal alignment than their predecessors, the design uses a range of measures to adjust the alignment to fit environmental constraints, but also adopts elements of the character of the adjacent landscape. This takes the form of tree and shrub planting, boundary hedges, walls, hedge-banks and the shaping of new landform.

Further information, including the Environmental Statement and other reporting, is available at <https://gov.wales/a40-llanddewi-velfrey-penblewin>.

In light of the above I would be grateful if you could confirm in writing if you are now content to withdraw your objection to the draft Statutory Orders.

Should you require clarification, or wish to discuss the above prior to responding, please do not hesitate to contact the project public liaison officer, Martin Gallimore, on A40enquiries@arup.com or

Yours sincerely



Mark Dixon
Project Director