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Mr Mark Dixon
Project Director

By email
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11th February 2020

**A40 LLANDDEWI VELFREY TO PENBLEWIN IMPROVEMENTS
MR AGP LEWIS & MR JWP LEWIS,**

Dear Mr Dixon

Thank you for your emailed letter of 14th January 2020 in response to our representations of objection dated 19th September 2019, in relation to the draft Statutory Orders associated with the Welsh Government's proposals for the A40 Llanddewi Velfrey to Penblewin Scheme.

Having studied your responses and having spoken to Martin Gallimore, I set out our responses below using your numbering from your letter for simplicity:

- 1 The design proposed is not as we had envisaged. It proposes to mimic, with some modification, the temporary access that our client had to use as a result of the existing access from the A40 trunk road being deemed unsuitable for use by the South Wales Trunk Road Agency for timber operations. As I have previously outlined, the existing A40 access, in place, was provided by the Welsh Office when the A40 was last upgraded in the 1970s and was designed for access to woodland.

When our client applied for a felling licence from Natural Resources Wales (NRW) in 2016, SWTA, who are a statutory consultee, objected to the access being used for timber operations. Hence being forced to use a temporary access. Our client is obviously still disappointed that we were stopped from using an accessway that was provided by the predecessors to the Welsh Government and therefore we do not want to be in the same position now and even worse, having to accept a worse position for the future. The temporary access across a field is not suitable.

Access to Fynnon woods must be from a hard track and we would suggest as previously requested, that access to Fynnon Woods should be provided via the same access to the adjacent attenuation pond, or via similar means.

We would welcome an opportunity to discuss this detailed design further.

For clarity

- 1.1 This is not correct and the temporary access is not the true access to Fynnon Woods. That is from the A40.
- 1.2 See above but note there is to be a proposed amendment, but suggest that that is reconsidered in light of our comments.
- 2 We do not agree with your statements.
 - 2.1 The proposed loss of land is over 2/3 of the field. For modern farming 2.2 acres is not economic.
 - 2.2 Given the amount of mitigation and opportunity for further mitigation around the proposed attenuation pond, there are ample opportunities for enhanced benefits despite translocation and request that this point is revisited.
 - 2.3 Noted.
- 3 Comments and proposed changes to detail are noted. I confirm our clients would be in agreement to amendments to draft orders to enable additional land to be acquired. We request further detail of the amendments to either end of the PMA and especially with regards to the proposed change in detail to the entrance adjacent to Caermaenau Fawr. It is not clear whether the hedge is to be translocated to improve the lines of visibility to the A478?
- 4 We remain concerned of the practicalities of the proposals for passing places around Henllan Lodge. We would welcome the opportunity to continue to work with Welsh Government on improving the design and agreeing a detailed design that was safe for vehicles and the occupants of Henllan Lodge.
- 5 We have significant reservations regarding the practicalities of the proposed arrangements at Blaen Pentroydin.

To summarise:

- a) The proposal to widen the road by filling in the drainage ditch, will impede drainage of the track. The ditch is there for a reason. Failure to enable water to drain off the track will result in scouring and excessive wear on the surface. The proposal is unsatisfactory.
- b) It is proposed not to upgrade the surface of the track and to retain mainly a stone surface. Given the intensification of use that is being forced on our clients, this is not acceptable. The track surface must be rethought and we would suggest that the track should be a concrete surface. As a PMA, our client will ultimately be responsible for maintenance with a greater number of users than now. To keep the status quo puts an unfair and inequitable burden on our client to maintain in the future, the anticipated upkeep of the proposed track post works is going to be

greater than envisaged by Welsh Government. We do not accept the proposals as they stand.

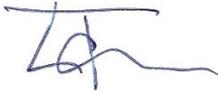
- c) We would welcome the opportunity to discuss further with Welsh Government and request further detail following our comments above.

Whilst our clients have engaged positively with Welsh Government and are broadly in support of the proposed road, there are still considerable matters of detail design that require further study and refinement before they will be acceptable. For that reason, we are unable to retrack our objection to the scheme but confirm that we wish to continue to work with Welsh Government with a view to finding an acceptable solution to the identified problems.

We would welcome an early meeting to discuss these points further.

I look forward to hearing from you in due course.

Yours sincerely



Lloyd James

**Acting as Agent for and on behalf of
MR AGP LEWIS & MR JWP LEWIS**

cc: Mr JWP Lewis
Mr AGP Lewis