



Pembrokeshire Friends of the Earth
c/o Eleanor Clegg

By email:

Your Ref: N/A
Our Ref: qA1316455 / R0040
Date: 12 February 2020

Dear Ms Eleanor Clegg

A40 LLANDDEWI VELFREY TO PENBLEWIN IMPROVEMENTS

I refer to your email dated 20 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. Compatibility with the Well-being of Future Generations Act, the Welsh Government's recently declared climate emergency, and Planning Policy Wales (Edition 10);
2. The need for the Scheme in light of the existing safety record of the A40 through Llanddewi Velfrey;
3. The necessity of improvements west of Llanddewi Velfrey linking to Penblewin roundabout;
4. Unacceptable damage to ancient woodland north of Llanddewi Velfrey;
5. Loss of passing trade for local businesses;
6. Alternatives proposed, defined as:
 - a. an underpass near the war memorial in Llanddewi Velfrey
 - b. Further reduction in the speed limit through the village
 - c. Traffic calming measures
 - d. Pavement widening and provision of new pavements

I shall address each of the above points using the above numbering, where appropriate:

1. Compatibility with the Well-being of Future Generations Act, the Welsh Government's recently declared climate emergency, and Planning Policy Wales (Edition 10);

- 1.1 The Scheme has been developed utilising Welsh Transport Appraisal Guidance (WeITAG) 2017, which embeds the principles of the Well-being of Future Generations Act (Wales) 2015 (WFG Act). As such, the Scheme seeks to improve the social, economic, environmental and cultural well-being of the local area and broader region through delivering the Welsh Government's commitment to enhance the strategic A40 corridor.
- 1.2 Chapter 5 of the ES, published on the 31 July 2019, provides the legislative and policy context for the Scheme and includes consideration of Planning Policy Wales and other legislation and guidance, including those related to climate change. Alongside the ES a Sustainable Development Report (SDR) has been produced, and will be published prior to the Public Inquiry, which sets out how the proposed Scheme aligns to the Welsh Government's Well-being of Future Generations Act and its sustainable development principle, including its contributions to the well-being goals and objectives.
- 1.3 The SDR concludes that the Scheme proposals are considered to represent sustainable development within the definition of the WFG Act. Whilst the report acknowledges that there would be some adverse environmental impacts, these have been mitigated wherever possible so that a positive contribution would be made to the majority of the national well-being objectives through improved road safety; increased network resilience; reduced community severance and noise impact; and improved air quality. To decide whether the Scheme amounts to sustainable development as defined in the WFG Act any potential adverse impact in respect of one well-being objective must be balanced against its positive contributions to other objectives. The Scheme has been developed and designed to provide a longer term and sustainable solution to the identified problems, offering economic, social, environmental and cultural improvements. The Scheme's significant overall contribution to achievement of the national well-being objectives and goals would be part of the process of improving well-being that constitutes sustainable development as defined in the WFG Act.
- 1.4 The SDR outlines how the proposed Scheme is in line with the policies outlined in Planning Policy Wales (Edition 10) (PPW). PPW states that access to jobs and services through shorter, more efficient and sustainable journeys should be enabled through the planning system. Targeted infrastructure is shown as an example of how we can achieve more efficient movement of people. The transport hierarchy defined in PPW10 paragraph 4.1.11 has limited relevance to the Scheme, which addresses existing transport problems and would not generate additional private motor vehicle trips in the same way as a new housing, retail or business development. Nevertheless, the Scheme would fulfil the objectives of PPW10 by reducing community severance and improving opportunities for active travel.
- 1.5 The declaration of a climate emergency by the Welsh Government in April 2019 does not imply that this Scheme is contrary to Welsh Government policy or the WFG Act, which have not resulted in a ban on all new road building in Wales. The Welsh

Government is taking action across all areas for which it has responsibility in order 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 2020-21 budget allocates £140m to support initiatives aimed at decarbonising transport.

2. The need for the Scheme in light of the existing safety record of the A40 through Llanddewi Velfrey;

- 2.1 Reducing the number and severity of collisions is one of a number of objectives that the Scheme seeks to address.
- 2.2 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.
- 2.3 Several sections of A40 between Haverfordwest and St Clears have 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.
- 2.4 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.
- 2.5 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.

3. The necessity of improvements west of Llanddewi Velfrey linking to Penblewin roundabout;

- 3.1 A Public Consultation was held in Llanddewi Velfrey village hall in 2006, where two route options were presented to the public for improvements between Ffynnon Wood and Penblewin. These were the Orange route (broadly consisting of on-line enhancements) and the Purple route (broadly consisting of offline improvements). The results of this Public Consultation were published in a "Statement of Results from Public Consultation" in February 2010. These route options can be viewed on the Welsh Government website here:
https://gov.wales/sites/default/files/publications/2017-09/a40-llanddewi-velfrey-to-penblewin-public-consultation-brochure-2006_0.pdf
- 3.2 While there was no clear preference for either the Purple or Orange routes at the 2006 Public Consultation, the majority of respondents supported improving the A40 between Ffynnon Wood and Penblewin.

- 3.3 A WS2+1 carriageway cross-section alleviates a number of the problems identified for the Scheme (e.g. limited safe overtaking opportunities, platooning etc.) and therefore the provision of a WS2+1 carriageway west of Llanddewi Velfrey linking to Penblewin roundabout would alleviate these issues over a greater length. The provision of a WS2+1 corridor cross-section requires the removal of direct accesses onto the carriageway, resulting in the need for parallel road corridors either side. The removal of private accesses onto the main trunk road is considered to provide additional safety benefits.
- 3.4 Improvements to the A40 between Ffynnon Wood and Penblewin support the overall Scheme objectives.

4. Unacceptable damage to ancient woodland north of Llanddewi Velfrey;

- 4.1 The wood at Blaen-Pen-Troydin is an area of Restored Ancient Woodland and is associated with the small valley of a minor watercourse. Clearance of a strip through this woodland is proposed to provide space for the road on an embankment. The extent of the clearance is shown in the ES Volume 3 Appendix 2.5, Environmental Masterplan, Sheet 5. I also enclose drawing A40LVP-ARP-HER-SWI-DR-LH-0002 to display the extent of this area and the Scheme proposals.
- 4.2 During route selection for the improvement scheme the proposed route was initially selected to minimise damage to the woodland but was subsequently realigned to the north to reduce damage further. The original vertical alignment was then reduced so that the embankment would be less high and less wide, and the overall width of land taken was minimised. Both these measures reduced the area of woodland required to be cleared to construct the Scheme by approximately 50%.
- 4.3 The reduced area of Restored Ancient Woodland clearance would occur where the designated area is a narrow finger of trees extending north from the main block of Ancient Woodland. Consequently, an area of approximately 0.18 hectares would be cleared, and the northern end of the finger would be severed. During route selection an alignment further to the north, to avoid the woodland altogether, was considered. However, this would result in the loss of other habitats, more significant adverse impact on farm businesses, and more harsh landscape and visual impact from the high embankment.
- 4.4 PPW10 paragraph 6.4.26 advises that such woodland areas should be protected from development unless there are significant public benefits. In view of its significant public benefits the Scheme accords with national planning policy regarding ancient woodland in PPW10.

5. Loss of passing trade for local businesses;

- 5.1 Should the Scheme proceed, access to Llanddewi Velfrey from the A40 trunk road would be retained for both the local community and other motorists who wish to use local facilities by the provision of the following:
- a roundabout at the eastern end of the village;
 - a major/minor priority junction at the western end of the village.

- 1.1 There is currently no advance signage present on the A40 to indicate the presence of local facilities within the village of Llanddewi Velfrey. A Traffic Signs and Road Markings Strategy (document reference A40LVP-ARP-HSN-SWI-FN-C-0001) has been prepared during the development of the Scheme. I enclose this document for reference. This strategy includes the provision of signage at the eastern roundabout and the western priority junction informing road users of local facilities, including the sale of fuel, that would be available within the village. Similar Local Facilities signage was provided on the Robeston Wathen and Canaston Bridge roundabouts as part of the A40 Penblewin – Slebech Park improvements. The sign would look similar to that shown in Figure 1.



Figure 1: Example of Local Facilities Signage to be provided as part of the Scheme

6. Alternatives proposed

6.1 I shall address each of the proposed alternatives below.

a) Provision of an underpass near the war memorial in the village of Llanddewi Velfrey

6.2 The provision of an underpass near the war memorial in the village of Llanddewi Velfrey would not meet the overall Scheme objectives.

6.3 The proposal as shown in the illustration on page 2 of your letter of 8 September would require additional land outside of the existing highway boundary.

6.4 The practicality of constructing the underpass would be difficult. Construction of the underpass without disturbing the A40 carriageway would be complicated, leading to significant disruption to traffic on the A40 with little measurable benefit from the provision of the underpass. The congested nature of the site within the middle of the village would also cause difficulties during construction.

b) Further reduction in the speed limit through the village

6.5 The A40 is a route of national and international strategic importance, forming part of the Trans-European Transport Network (T-ENT). At a regional and local level, it serves the county town of Haverfordwest, the tourist economy of central and north Pembrokeshire, the port of Fishguard and the industrial town of Milford Haven to the south.

- 6.6 The existing section of the A40 through Llanddewi Velfrey is subject to a 40mph speed limit. Reducing the speed limit further would not contribute to the following scheme-specific objectives:
- a) To enhance network resilience and improve accessibility along the east-west transport corridor to crucial employment, community and tourism destinations;
 - b) To improve the prosperity and provide better access to the county town of Haverfordwest, the Haven Enterprise Zoe and West Wales ports at Fishguard and Milford Haven
- 6.7 Additionally, the reduction of speed through the village would be likely to exacerbate the existing issues related to platooning (when there are convoys of heavy goods vehicles from the ferry ports and slow-moving agricultural vehicles) and would not solve the problems associated with limited and inconsistent overtaking opportunities which lead to journey time unreliability, driver frustration and associated dangerous manoeuvres with severe collision incidents.

c) Traffic Calming Measures

- 6.8 Traffic calming measures, such as the provision of speed bumps, would reduce the speed of traffic through the village of Llanddewi Velfrey. I have discussed the issues associated with speed reduction along the A40 in paragraphs 6.5 to 6.6 above.

d) Pavement widening and provision of new pavements

- 6.9 I have assumed in this section that by 'pavement widening and provision of new pavements' you mean widening/ provision of new footpaths, and not widening / provision of new highway pavement.
- 6.10 Sections of the highway layout through Llanddewi Velfrey do not meet current design standards. The horizontal alignment is generally poor, and the road narrows to 6.5 metres in places. No hardstrips are provided and footways are narrow and below standard.
- 6.11 As part of the Scheme, the Welsh Government are considering options to improve Active Travel through the village. With the new Scheme in place, the significant reduction in traffic through the village does provide an opportunity to increase the footway pavement width which would encourage walking and cycling through and within the village by improving the perceived safety of the footpath.
- 6.12 While I have provided an overview of the issues associated with your proposed alternatives, these proposals have not been developed in detail at this stage. A Public Local Inquiry (PLI) for the Scheme will commence on 10 March 2020 in Llanddewi Velfrey Village hall and is scheduled to run for three weeks. You have the right to formally propose these alternatives for consideration at the PLI. The deadline date for an alternative submission is 25 February 2020. You may be asked to present these alternatives to the Inspector at the PLI.
- 6.13 Should you wish to present these alternatives at the PLI, I would be grateful if you could confirm in writing your intention to do so for the project team to consult with you on the exact nature of your proposals.

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

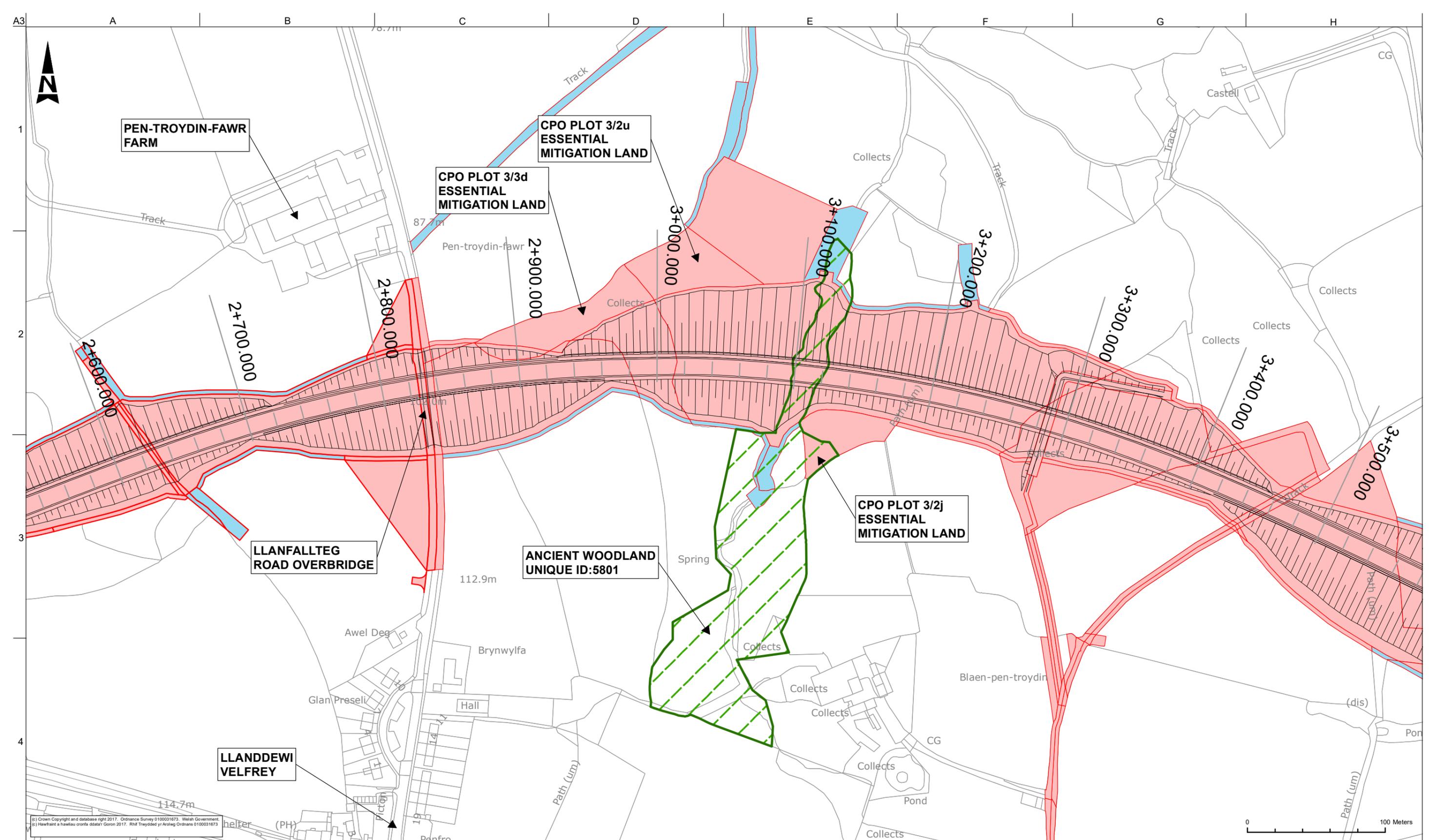
Yours sincerely



Mark Dixon
Project Director

Enclosures:

Drawing A40LVP-ARP-HER-SWI-DR-LH-0002 – Impact of the Scheme of Blaen-Pentroydin Wood



- LEGEND**
- ALIGNMENT
 - ANCIENT WOODLAND
 - TITLE
 - EASEMENT

NOTE
 Area of ancient woodland affected by permanent scheme landtake (Title) = 2,666 sq m

There is no intention to fell woodland within the areas shown in light blue. The Welsh Government only require access into these areas for future maintenance.

SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION	
In addition to the hazards/risks normally associated with the types of work detailed on this drawing, note the following significant residual risks (Reference shall also be made to the design hazard log)	
Construction	None
Maintenance / Cleaning	None
Use	None
Decommissioning / Demolition	None

Rev	Date	Description	By	Chkd	Appd	Auth
P01	27/01/20	FIRST ISSUE	AC	GJ	AS	GD

Project Title
A40 LLANDEDEWI VELFREY TO PENBLEWIN IMPROVEMENTS

Client

 Llywodraeth Cymru
 Welsh Government

Delivery Team

Drawing Title
IMPACT OF SCHEME ON BLAEN-PENTROYDIN WOOD

Suitability
S3 | FIT FOR REVIEW AND COMMENT

Scale at A3
 1:2,500

Rev	By	Date	Chkd	Date	Appd	Date	Auth	Date
P01	AC	27/01/20	GJ	27/01/20	AS	27/01/20	GD	27/01/20

Name
A40LVP - ARP - EHR - SWI - DR - LH - 002

Project Originator Volume Location Type Role Number