

A40 Llanddewi Velfrey To Penblewin Inquiry Reply to Welsh Government's Objection Response

This document replies to the Welsh Government's objection response letter, dated 12th February 2020 (Doc. R0015-2). This reply is intended to support and not supersede the original objection letter of 8th September 2019.

1. Induced Traffic

1.1. The promoter's traffic estimates claim that traffic volumes *"would be unaffected by the Scheme"* (Doc. R0015-2 para. 1.1).

1.2. Predicting the future with any degree of accuracy is challenging. The Future Generations Commissioner for Wales in the report "Transport Fit for Future Generations" adopted the principle that transport planners need to *"refrain from a 'predict and provide' approach...any notion of the prediction being 'accurate' is illusory."* (Ref. TW-01, page 15).

1.3. In 2006 Professor Phil Goodwin found 80 years of evidence consistently supporting the conclusion that *"new roads generate more traffic independently of changes arising from growth in population or the economy"* (Ref. TW-01, page 16).

1.4. The promoter claims that the scheme would provide economic benefits to Pembrokeshire. This is contradictory to the claim that the scheme will not induce traffic.

2. Climate Change Implications

2.1. Increased Greenhouse Gas Emissions

2.1.1. The promoter admits that the scheme would increase greenhouse gas emissions. Since their estimates do not foresee induced traffic, the actual emissions would be greater than forecast.

2.1.2. The Welsh Government defends the increased greenhouse gas emissions by making them appear insignificant (Doc. R0015-2, para. 1.2) and by requesting that the scheme be seen in the context of its efforts to tackle climate change (Doc. R0015-2, para. 1.4). Every tonne of greenhouse gas emitted is another step closer to breaching the 1.5°C global warming threshold set in the Paris Agreement.

2.1.3. Government policy, legislation and international agreements are based around targets (eg. net zero CO₂ emissions by 2050). Prosperity for All: A Climate Conscious Wales lists *"wetter winters, warmer summers, increased incidence of storms and extreme weather and rising sea levels"* as expected climate change impacts. (Doc. 4.01.23, page 5). Deeper and/or faster reduction in emissions would reduce the severity of climate change and therefore lessen these impacts.

2.1.4 It should also be remembered that achieving the target of net-zero CO₂ emissions by 2050 does not guarantee that the Paris agreement's 1.5°C long-term temperature goal will be met. According to the Committee on Climate Change, achieving net zero by 2050 only gives a 50:50 chance of remaining below the 1.5°C threshold (Ref. TW-03, table 2.1, page 80).

2.1.5. The Welsh Government's actions on transport decarbonisation have so far been limited and fall short of what is required. It has been suggested that "there was no way of knowing" whether the Welsh Government's draft 2020-21 budget "was net carbon-emitting or not". (Ref. TW-04, para. 226). As part of the budget scrutiny, the New Economics Foundation looked at the five largest active road-building projects in Wales and found that "they all appear to be net carbon-emitting projects" (Ref. TW-04, para. 226). Far from being an exception, the Llanddewi Velfrey scheme appears to perpetuate a long-standing programme of carbon-intensive road capacity projects.

2.1.6. While the measures outlined (Doc. R0015-2, para. 1.5) would limit the scheme emissions to a certain extent, there is no proposed mitigation for 'user carbon' which accounts for 97.3% of the scheme's emissions (as stated in Doc. R0015-2, para. 1.3).

2.1.7. 'Transport Fit for Future Generations', a report published by the Future Generations Commissioner for Wales, quotes an IWA report on decarbonisation of transport in Wales as follows. "*Wales risks failing to meet its own targets on carbon emissions unless it changes its over-reliance on the car.*" (Ref. TW-01, page 15) Pressure to construct bypasses and additional traffic lanes is a symptom of this car-dependence, but implementation of such schemes is not the cure.

2.2. Compatibility With Environmental Policies

2.2.1. (Doc. R0015-2 para. 2a) states that WelTAG 2017 embeds the future generations principles. However, the WelTAG appraisal found that the scheme did not contribute positively to objectives 7 and 8. (Doc. 4.03.07, section 4.7). Since these two objectives are the only ones aligned to the national well-being goal of 'a globally responsible Wales' this project would have a negative impact on that goal. It would therefore be 'globally **irresponsible**' to proceed with the scheme.

2.2.2. The sustainable transport hierarchy defined in Planning Policy Wales Edition 10 "*should be used to reduce the need to travel*" and prioritise "*access and movement by active and sustainable transport*" (Doc. 4.01.30 para. 4.1.12). While the scheme does include a number of active travel provisions, private motor vehicles would be massively prioritised above public transport.

2.2.3. The Welsh Government's response (Doc. R0015-2 para. 2d) argues that "The transport hierarchy defined in PPW10 paragraph 4.1.11 has limited relevance to the Scheme". However, section 5.3 of PPW10 makes clear that transportation infrastructure should be *"consistent with Welsh Government policy to encourage and increase use of sustainable transport and reduce reliance on the private car"* (Doc. 4.01.30 para. 5.3.2). The section regarding the strategic road network specifically states that *"new road schemes and road improvements should take into account the transport hierarchy, whereby active and sustainable transport is considered before private motor vehicles."* (Doc. 4.01.30 para. 5.3.13). This both confirms that the hierarchy is relevant and reinforces that private motor vehicles are **not** 'sustainable transport'. The scheme is inconsistent with Planning Policy Wales.

2.2.4. Prosperity for All: A Low Carbon Wales contains an ambition *"to replace car journeys with those using the existing public transport system and active travel"*. This is described as *"The most effective way of reducing CO₂ emissions in the near-term"* (Doc. 4.01.24, page 97). The target is a 43% reduction in transport sector emissions by 2030 (Doc. 4.01.24, page 99), to be achieved in part by encouraging modal shift. The promoter does not appear to have provided any evidence that the Llanddewi Velfrey to Penblewin scheme is compatible with this target.

2.2.5. Furthermore, Prosperity for All: A Low Carbon Wales was published in March 2019. The Welsh Government did not declare a climate emergency until April 2019 and did not announce its target for 'Net Zero' greenhouse gas emissions by 2050 until June 2019. Prosperity for All: A Low Carbon Wales was therefore based on the previous target *"to reduce emissions by at least 80% against the 1990 baseline"* (Doc. 4.01.24, page 13). The scheme has not been shown to be compatible with the target of a 43% reduction in transport sector emissions, let alone the more-ambitious targets necessary to achieve net zero emissions.

3. Impact On Public Transport Patronage

3.1. Road congestion, and poor journey time reliability on the road network, are considered to be a deterrent to private car use. The SWWITCH Rail Strategy by AECOM states that *"This will strengthen the competitiveness of rail versus car."* (Ref. TW-02, page 7). Modal shift from road to rail in south west Wales could be achieved if *"adjacent roads become more affected by congestion."* (Ref. TW-02, page 8). The promoter's scheme does not include rail improvements to offset the increased attractiveness of the A40 after the works. It is therefore likely to lead to modal shift away from rail.

3.2. In a report for the Committee on Climate Change, Dr Richard Carmichael of Imperial College London highlights that *"Mixed messages are highly damaging to public understanding, trust and sense of personal capacity to act"* (Ref. TW-05, page 18). The proposed scheme would project the impression that driving is encouraged. It therefore undermines the Welsh Government's stated ambition to reduce car use.

4. Value For Money

4.1. The Welsh Government's response to Jeff Jenkins revealed that the Benefit Cost Ratio (BCR) for the scheme is 0.13 (R0016-2 para. 2.13). Benefits of only 13p for every pound spent is surely grounds for the scheme to be cancelled.

5. The Ffynnon Wood to Penblewin Section

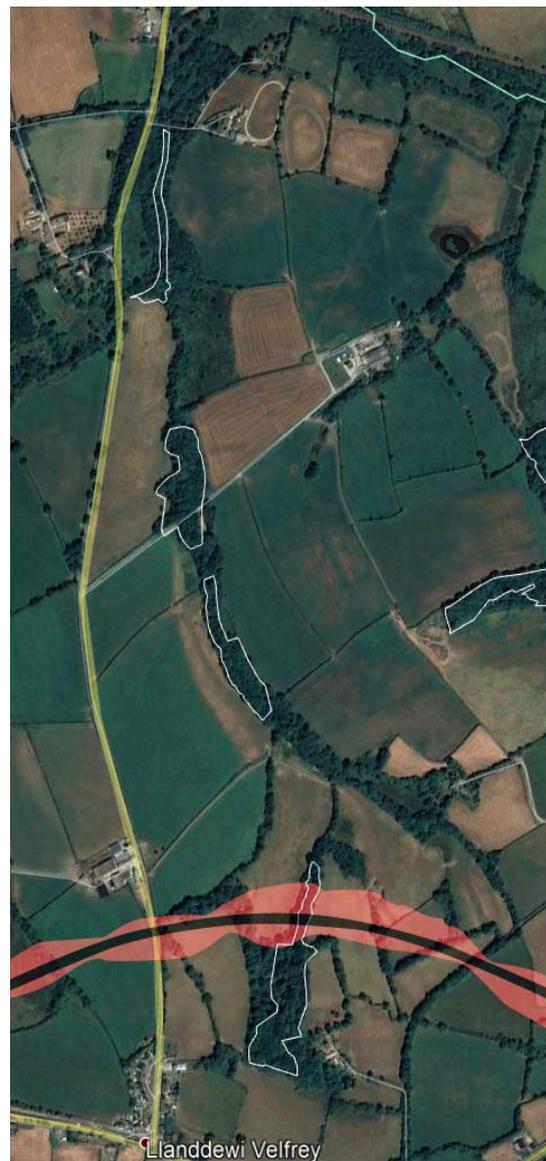
5.1. While the majority of respondents supported 'improvements' west of Ffynnon Wood, this was a small majority (54%). The wording of the relevant question is recorded as follows: "Do you think the section between Ffynnon Wood and Penblewin Roundabout should be improved?" (Doc. 4.02.07, question 4). This question does not define the extent of the 'improvement' so the result does not indicate support for rebuilding and enlarging Penblewin roundabout. Neither does it necessarily indicate support for an additional lane (2+1 road). Some of the support may have been for minor improvements, such as those described in the 2006 Addendum to technical appraisal report (Doc. 4.02.06 paragraphs 3.4.2 - 3.4.7).

6. Habitat Destruction

6.1. Planning Policy Wales states that development "*must provide a net benefit for biodiversity.*" (Doc. 4.01.30 para. 6.4.5). Is the mitigation proposed sufficient to fully compensate for the scheme and provide ecological benefits?

6.2. The aerial photography (right) shows a chain of four ancient woodlands (shown with white outlines) linked by hedgerows that form wildlife corridors. It also shows how the scheme would create woodland severance by separating the impacted area of ancient woodland from the other three.

6.3. (R0015-2 section 6) discusses only the impact on areas designated as 'ancient woodland'. However, the woodland extends beyond the 'ancient woodland' boundary. The scheme would also impact on some of this non-designated woodland. PPW10 (Doc. 4.01.30 para. 6.4.26) states that semi-natural woodlands, not just those that are 'ancient', "*are irreplaceable natural resources*" and "*should be afforded protection from development*". Has the impact on these additional areas of woodland been accounted for, mitigated and compensated for?



7. Conclusion

The Welsh Government does not provide a convincing argument that the scheme is consistent with its environmental policies. Neither has it shown that the project would be compatible with the net-zero climate target, which was adopted after the scheme had been developed. With a BCR of only 0.13, the scheme would also be extremely poor value for money.

References

Ref. TW-01: Transport Fit For Future Generations, September 2018.

<https://futuregenerations.wales/wp-content/uploads/2018/11/20180912-Transport-Fit-for-Future-Generations-C-1.pdf>

Ref. TW-02: SWWITCH Rail Strategy Executive Summary, AECOM, November 2013.

Ref. TW-03: Net Zero - The UK's contribution to stopping global warming, Committee on Climate Change, May 2019.

<https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf>

Ref. TW-04: Scrutiny of the Welsh Government Draft Budget 2020-2021, National Assembly for Wales Finance Committee, January 2020.

<https://www.assembly.wales/laid%20documents/cr-ld12991/cr-ld12991%20-e.pdf>

Ref. TW-05: Behaviour change, public engagement and Net Zero, A report for the Committee on Climate Change, Dr Richard Carmichael, Imperial College London, October 2019.

<https://www.theccc.org.uk/wp-content/uploads/2019/10/Behaviour-change-public-engagement-and-Net-Zero-Imperial-College-London.pdf>