

Adran Seilwaith yr Economi
Department for Economic Infrastructure



Llywodraeth Cymru
Welsh Government

**THE LONDON TO FISHGUARD TRUNK ROAD (A40) (LLANDDEWI
VELFREY TO PENBLEWIN IMPROVEMENT AND DE-TRUNKING) ORDER
201-**

**THE LONDON TO FISHGUARD TRUNK ROAD (A40) (LLANDDEWI
VELFREY TO PENBLEWIN IMPROVEMENT) (SIDE ROADS) ORDER 201-**

**THE WELSH MINISTERS (THE LONDON TO FISHGUARD TRUNK ROAD
(A40) (LLANDDEWI VELFREY TO PENBLEWIN IMPROVEMENT))
COMPULSORY PURCHASE ORDER 201-**

Rebuttal Statement

Objection Reference R0016

Response to Objector's Evidence: Mr Jeff Jenkins - Preseli Service Station
Limited

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1. GROUNDS FOR OBJECTION

Details

- 1.1 Mr Jeff Jenkins of the Preseli Service Station has not submitted a Statement of Evidence in relation to the draft Orders associated with the Welsh Government's proposals for the A40 Llanddewi Velfrey to Penblewin Improvements.
- 1.2 The Welsh Government understands that Mr Jenkins' correspondence to the Welsh Government (dated 6 September 2019) forms the basis of Mr Jenkins' objection and is based on the following:
 - a) The removal of passing trade through the village will have such a detrimental impact on the Preseli Service Station business that it will cause it to close thereby depriving the local community of its services;
 - b) The road has had no fatalities;
 - c) The road is free-flowing; and
 - d) The road provides poor value for money to the taxpayer.

2. REBUTTAL

- 2.1 The above points have already been addressed in previous correspondence with Mr Jenkins as listed in Appendix A. Further detail is provided by the relevant witness in the following sections. This is in addition to the witnesses' proofs of evidence, to which readers should also make reference in their entirety for a full understanding of the Welsh Government's case.

2.2 For ease of reference, the table below lists the sections where the above points are addressed in this Rebuttal:

| Objector's point reference | Rebuttal paragraph reference |
|-----------------------------------|-------------------------------------|
| a | 2.4 to 2.8 2.41 to 2.48 |
| b | 2.14 to 2.20 |
| c | 2.21 to 2.24 |
| d | 2.9 to 2.13 2.25 to 2.41 |

2.3 The Objector's points have previously been covered in correspondence and proofs of evidence; these are listed below with specific references. The main points from the proofs of evidence are repeated thereafter.

Point a (Passing trade) – Mark Dixon's Proof of Evidence, WG 1.1.2 section 7.30 and 7.31, Philip Thiele's Proof of Evidence, WG 1.2.2 section 8.25 and 8.29 and Tom Edwards' Proof of Evidence WG 1.3.2 section 5.248 to 5.249.

Point b (The road has no fatalities) – Philip Thiele's Proof of Evidence, WG 1.2.2 section 3.34 to 3.37.

Point c (The road is free-flowing) – Philip Thiele's Proof of Evidence, WG 1.2.2 section 3.17 to 3.33.

Point d (The road provides poor value for money) – Philip Thiele's Proof of Evidence, WG 1.2.2 section 7.1 to 7.90.

Mark Dixon (Chief Witness)

Point a – Removal of passing trade

2.4 In response to point a, I am unable to comment on whether the Preseli Service Station business would remain viable. However, it may benefit from the reduced traffic levels that will improve accessibility for those within the local community. Apart from anything else, this will depend upon the financial circumstances, decisions and approach of any

businesses and individuals involved. As part of the Scheme, the Welsh Government is 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 footway. This would make it safer and more accessible for the local community to use your business.

- 2.5 There is also a similar example nearby, to refer to as a point of reference. The improvements to the section of A40 between Robeston Wathen and Slebech opened in 2011 and resulted in a significant reduction in traffic volumes passing through the village of Robeston Wathen. The consequence of this was less passing trade for the petrol station in Robeston Wathen which is located at Dyrham House. This was mitigated by the Local Facilities signage referred to in paragraph 2.45 of this Rebuttal. The petrol station in Robeston Wathen continues to trade nine years after the improvements scheme was opened.
- 2.6 As I understand it, Preseli Service Station Limited appears to be an established and dynamic business of many parts including used car sales, gas and fuel sales as well as the post office, collection and supermarket resources, all of which are marketed via various websites. I have already said that I am unable to comment upon the viability of the business but it would appear that the business is currently assisted by its local reputation, which may not necessarily receive an adverse impact, as well as its online presence and passing trade.
- 2.7 The intended signage changes which are set out below will seek to encourage the flow of passing trade towards the village, particularly those members of the public wishing to take advantage of the services offered.
- 2.8 There is no statutory provision to enable the Welsh Government to compensate businesses for loss of trade or profit resulting from road

improvement or maintenance. Where a highway authority carries out works under statutory power or duty, and performs these works properly, there is no legal liability on the authority for loss of business. Neither does Welsh Government have the power to make ex gratia offers of payment or compensation for trade disturbance.

Point d – The road provides poor value for money to the taxpayer

- 2.9 In response to point d, 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.
- 2.10 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 UK¹*”. Pembrokeshire generally suffers from lower than average levels of employment, productivity, investment and attainment, as identified through a Welsh Transport Appraisal Guidance (WelTAG) Study. Business surveys responding to an Economic Activity and Location Impact (EALI) study (Doc. 4.02.11) 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 increase 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.
- 2.11 More locally, the St Clears to Haverfordwest section of the A40 has developed to connect small villages and as such, many sections of the

¹ Paragraph 4.3.4 - Trunk Road Forward Programme 2002 (Doc. 4.01.44)

A40 pass through these communities, leading to problems of community severance, air and noise pollution and perceived safety problems.

2.12 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 (Doc. 4.01.44). 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 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).

2.13 I confirm that the statement of truth and professional obligations to the Inquiry from my main proof still applies.

Philip Thiele (Traffic and Economics)

Point b – The road has had no fatalities

2.14 In the following paragraphs, I respond to point b; the point that the A40 has had no fatalities.

2.15 Reducing the number and severity of collisions is one of several objectives that the Scheme seeks to address. Between 2006 and 2015 there have not been any fatalities on the section of the A40 that would be bypassed by the Scheme. However, any accident that can be avoided, whether it leads to damage only, or slight, severe or fatal injuries, has to be given due consideration in the accident analysis for the Scheme.

2.16 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.

- 2.17 Several sections of A40 between Haverfordwest and St Clears have already been upgraded to the Wide Single 2+1 road standard (WS2+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 compared to single carriageway roads.
- 2.18 Local accident rates have been calculated based on accident records between 2006 and 2015. Between Haverfordwest and St Clears, the accident rate for WS2+1 roads with a 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.
- 2.19 Under central growth assumptions, the accident analysis forecasts a saving of 41 personal injury accidents resulting in 51 fewer casualties over the 60-year appraisal period. The total benefits accrued from monetised accident savings amount to £1.39m.
- 2.20 The Scheme would remove 96% of traffic from the village of Llanddewi Velfrey in the Scheme design year (2036), thereby creating a safer environment within the village. The removal of traffic would provide the opportunity to widen footways through the village and make walking, cycling and horse-riding a more attractive proposition for trips within the village.

Point c – The road is free-flowing

- 2.21 In the following paragraphs, I respond to point c, which is the point that the A40 is free-flowing.
- 2.22 The A40 accommodates a mix of traffic types, with seasonal variations. The road 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 properties and fields.
- 2.23 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) contributes to journey time unreliability along the A40 corridor. Journey times along the A40 within the study area are on average between 15% and 17% higher during daytime hours than during night time hours, when platooning is much less prevalent due to the lower traffic volumes.
- 2.24 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 further contributes to the identified lack of journey time reliability and safe overtaking problems.

Point d – The road provides poor value for money to the taxpayer

- 2.25 In the following paragraphs, I respond to point d; the point that the Scheme provides poor value for money to the taxpayer.
- 2.26 The requirement for a value for money analysis is set out within the Transport Case defined within WelTAG. Value for money is expressed through the Benefit Cost Ratio (BCR). The BCR considers only costs and benefits that can be quantified in monetary terms. Under central growth forecast assumptions, the BCR for the Scheme is 0.13, which suggests that the costs of the Scheme outweigh the quantifiable

benefits. A significant proportion of these benefits are accrued through journey time savings and a reduction in the number and severity of accidents.

- 2.27 However, quantitative economic analysis does not capture all of the expected benefits of the Scheme. Because the economic appraisal is a quantitative assessment, the analysis is focussed on but not limited to, impacts on the economic efficiency of the transport sector. There may be other costs and benefits that cannot be quantified in monetary terms or for which the effort to quantify the benefits would be disproportionate to the scale of expected benefits.
- 2.28 For example, the traffic model represents average hourly operating conditions and does not fully capture the interaction of slower and faster moving vehicles or the formation and dispersal of platoons. There would be additional journey time savings and journey time reliability benefits associated with this, but they cannot be captured as part of the standard traffic modelling approach and as such are not reflected in the BCR.
- 2.29 Other non-monetised benefits include the impact of seasonality and other periods of high demand, impacts on freight, reduced driver stress and frustration, improvements in journey quality, enhanced network resilience, as well as improved prosperity, health and amenity benefits. The improvements would also contribute to better and safer walking, cycling and horse-riding circulation within the village and a reduction in community severance within Llanddewi Velfrey.
- 2.30 Therefore, qualitative aspects need to be considered in conjunction with the quantitative analysis. The economic appraisal is only one aspect of the overall case for investment and needs to be balanced against other environmental, social and cultural costs and benefits and should be considered in the context of the overall scheme objectives. Value for money of the Scheme needs to be considered alongside other Welsh Government policies, the impact of which cannot be quantified for

inclusion in the BCR; in particular the seven goals in the Well-being of Future Generations (Wales) Act 2015.

- 2.31 Furthermore, while the BCR provides an important indication of the likely scale of economic costs and benefits for the project, it does not incorporate all of the factors relevant to making an overall assessment of its value for money as explained in paragraph 2.27 to 2.29.
- 2.32 It should also be considered that the Llanddewi Velfrey to Penblewin Improvements need to be seen in the context of the overall A40 corridor improvement, of which it forms an integral component. Paragraph 2.9 to 2.12 of this Rebuttal describes the strategic need for improvements along the A40 corridor.
- 2.33 Additional sensitivity tests were also undertaken to assess the impact of alternative future road network configurations on the economic case for the Scheme.
- 2.34 The first additional sensitivity test was undertaken to assess the impact of an alternative scheme design. The proposed Scheme includes a roundabout at the Llanddewi Velfrey East Junction. This has a negative effect on travel time savings as it introduces additional delay to through traffic travelling along the A40, compared to a staggered T-junction in its place.
- 2.35 While a staggered T-junction is compliant with design standards in the DMRB, a roundabout was instead adopted into the Scheme proposals based on the levels of support for it following public engagement as documented in the proof of evidence of Tom Edwards (WG 1.3.2). His proof of evidence also highlights the benefits of a roundabout. An additional benefit of the roundabout in operational terms is that it facilitates easier movements of traffic from Llanddewi Velfrey turning right onto the eastbound A40 because vehicles making this manoeuvre only need to give way to traffic travelling westbound along the A40.

- 2.36 The economic appraisal results of this alternative scheme option show that user benefits would be around three times higher than the proposed Scheme, indicating that the BCR would be in the order of 0.4. This illustrates that the BCR is very sensitive to relatively small changes in the Scheme design.
- 2.37 A second sensitivity test was undertaken with the impact of traffic on local communities in mind. Based on feedback received at public engagement events, local residents consider traffic to have a negative impact on their quality of life and that there are safety issues with the road as it stands.
- 2.38 In the absence of the Scheme, a possible alternative measure to improve safety would be to reduce traffic speeds through Llanddewi Velfrey and between the village and Penblewin, although the Welsh Government has currently put no such proposal forward. Lower traffic speeds would improve safety at the Penblewin rest area junction and within the village of Llanddewi Velfrey, but would do little to address community severance, as the volume of traffic passing through the village would not be affected. It should be noted that this is not being put forward as an alternative to the Scheme, but rather as a measure that may have to be implemented if the Scheme does not go ahead and therefore would affect the assumptions applied in the 'Do Minimum' scenario.
- 2.39 We have therefore tested an alternative 'Do Minimum' scenario in which the speed limit is reduced to 50mph between Penblewin and Llanddewi Velfrey and 30mph through the village. Under the 'Do Something' scenario, we have assumed that the speed limit on the proposed section of road would remain at 60mph as the highway would be built to modern standards and the traffic would not be passing through the village.
- 2.40 When we compare the Scheme against this alternative 'Do Minimum' it results in a significantly better economic case for the Scheme. This is because journey time savings would be substantially improved by more

than 60 seconds as a result of the lower speeds in the alternative 'Do Minimum'. The result of this would be broadly a fivefold increase in benefits and a BCR of around 0.6, illustrating the sensitivity of the economic case to the speed limit.

2.41 I confirm that the statement of truth and professional obligations to the Inquiry from my main proof still applies.

Tom Edwards (Engineering)

Point a – Removal of passing trade

2.42 In response to Point a, the Preseli Service Station is located within the village of Llanddewi Velfrey with direct access from the existing A40 trunk road. The proposals for the A40 Llanddewi Velfrey to Penblewin Improvements include a northern bypass of the village of Llanddewi Velfrey. Therefore, if the Scheme was to proceed, the Preseli Service Station would no longer have direct access to the A40 trunk road. That does not mean that passing trade has been removed.

2.43 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) a roundabout at the eastern end of the village (Llanddewi Velfrey East Junction); and
- b) a major/minor priority junction at the western end of the village (Llanddewi Velfrey West Junction).

2.44 There is currently no advance signage on the existing A40 to indicate the presence of local facilities within the village of Llanddewi Velfrey and the presence of Preseli Service Station.

2.45 A Traffic Signs and Road Markings Strategy has been prepared during the development of the Scheme and is included in the Alignment and Junction Strategy Report (Doc Ref. 4.04.02). This strategy includes the provision of signage at the Llanddewi Velfrey East and West Junctions

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

- 2.46 The number and extent of the symbols on the signage depends on the requirements of The Traffic Signs Regulations and General Directions 2016 (TSRGD). The sign shown in Figure 1 is based upon the requirements of Diagram 2308.1 of the TSRGD. The symbols currently shown are the minimum requirements for the sign. Further symbols could be included following an assessment of the facilities during the detailed design of the project, if the Scheme was to proceed.
- 2.47 If a road user would need to use the facilities at the Preseli Filling Station, they would not experience a substantial diversion, when compared to the existing access. The proposed junctions at either end of the village (Llanddewi Velfrey East and West Junctions) would provide convenient eastbound and westbound access to the Preseli Filling Station via the detrunked existing A40.
- 2.48 Therefore, in my professional opinion, the potential passing trade has not been removed in its entirety, merely the direct access and direct visibility from the trunk road has been removed.

2.49 I confirm that the statement of truth and professional obligations to the Inquiry from my main proof still applies.

Appendix A - Correspondence List

| Date | In/Out | Author | Email/Post/Meeting |
|-------------|---------------|---------------------------|---------------------------|
| 06/09/2019 | In | Mr Jeff Jenkins | Letter |
| 12/02/2020 | Out | Welsh Government/Other | Letter |