



Janine Perkins

Your Ref: N/A  
Our Ref: qA1316455 / R0089  
Date: 03 March 2020

Dear Janine Perkins

## **A40 LLANDDEWI VELFREY TO PENBLEWIN IMPROVEMENTS**

I refer to your correspondence dated 21 January 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. A safer, wider pavement needs to be constructed;
2. Funding for the Scheme should be spent elsewhere;
3. The need for the Scheme; particularly in light of the impact on the environment and the detrimental impact that the increase in traffic speeds for through traffic will have on the local residents.

I shall address each of the above points below:

### **1. A safer, wider pavement needs to be constructed;**

- 1.1 I have deduced that by 'wider pavement' you mean widening of existing footpaths, and not widening of new highway pavement.
- 1.2 Widening the existing footpath would cause a reduction in width of the highway carriageway. The highway layout through Llanddewi Velfrey does not meet current design standards. The horizontal alignment is generally poor when compared to modern design standards, and the road narrows to 6.5 metres in places. No hardstrips are provided.



- 1.3 A further reduction in carriageway width by widening the footpath would further exacerbate the existing risks to drivers navigating this section of the A40 due to the below standard carriageway width.
- 1.4 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 (a 96% reduction in traffic) provides an opportunity to increase the footpath width. Additional proposals to include a reduction in the current speed limit, an upgraded crossing at the war memorial, improved access to existing Public Right of Ways (PRoWs) and improvements to landscaping.
- 1.5 These proposals could only be safely implemented once the Scheme is in place, and are complementary to the Scheme proposals.

## **2. Funding for the Scheme should be spent elsewhere**

### **Funding for this Scheme should be used on other areas of the trunk road network**

- 2.1 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.
- 2.2 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. More prosperous areas of Wales would not qualify for this funding, and as a result the WEFO / ERDF funding could not be spent on trunk road schemes within these areas.

### **Funding for the Scheme should be used on alternative solutions to road traffic**

- 2.3 In 2002, the A40 St Clears to Haverfordwest Multi-modal Corridor Study was carried out. The study considered 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.
- 2.4 A Stage 1 Welsh Transport Appraisal Guidance (WelTAG) study was undertaken for the Scheme. A public transport option was considered during the WelTAG Stage 1 appraisal undertaken in 2017 and 2018 as part of the initial works for this stage of the project. From the WelTAG Stage 1 appraisal it was deemed that public transport was not considered to address the problems sufficiently or meet the objectives. It was also deemed that a subsidy would be required from the Welsh Government to improve bus services within the study area.



### **3. The need for the Scheme, at the expense of those living in the area, particularly in light of the environmental costs.**

#### **Strategic need for the Scheme**

- 3.1 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. 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”.
- 3.2 Pembrokeshire generally suffers from lower than average levels of productivity and investment, as identified within the Welsh Transport Appraisal Guidance (WelTAG) Stage 3 Study. Business surveys responding to an Economic Activity and Location (EALI) study, undertaken in 2015, raised concerns about poor journey time reliability, vehicle platooning and lack of safe overtaking opportunities. As part of this study, stakeholder engagement with local businesses confirmed that improvements to the A40 are essential to reduce isolation, increase connectivity to employment opportunities and attract more tourists to the region. Local public exhibitions as part of the A40 Llanddewi Velfrey to Penblewin WelTAG study have also helped local people to express concerns about the need for complimentary improvement to local walking, cycling and equestrian connections following completion of the Scheme.
- 3.3 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 along the A40. Along the section of the A40 considered for improvement as part of this Scheme, there are numerous side road junctions and a high number of direct accesses to property and fields from the A40.
- 3.4 In the summer months, the existing traffic mix is supplemented by a higher volume of tourist traffic (increasing in some areas by over 40%) including cars and caravans. This contributes to the identified lack of journey time reliability and safe overtaking problems.
- 3.5 More locally, the St Clears to Haverfordwest section of the A40 has been developed to connect small villages, and as such, many sections of the A40 pass through these communities, leading to problems of community severance, air and noise pollution and perceived safety problems.
- 3.6 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 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-publicinquiry.co.uk/uploads/2020/02/03155407/1.1.1-Statement-of-Case-Part-A-Policy-Statement.pdf> )



## Environmental Impacts

- 3.7 The Environmental Statement (ES) outlines the various environmental assessments undertaken, and also identifies proposed environmental mitigation measures where the need has been identified in the assessments.
- 3.8 While I acknowledge that the assessments have identified areas where there would be some adverse impacts (e.g. impacts to agricultural land), it has also identified areas where there would be beneficial impacts (e.g. a decrease in noise levels for the majority of residents in the village).
- 3.9 The Scheme would also remove the 96% of traffic from the village of Llanddewi Velfrey, thereby creating a safer environment within the village. As described in section 0, 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.

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](mailto:A40enquiries@arup.com) or

Yours sincerely



**Mark Dixon**  
**Project Director**

