

Pembrokeshire Friends of the Earth

Objections to the Proposed Llanddewi Velfrey Bypass on the A40 Trunk Road

Response to WG Rebuttal of our Objection Reference R0040, dated March 2020

Introduction

Friends of the Earth Pembrokeshire continue to object to this project. We will respond to your rebuttal of our objections focusing on two points: the increased greenhouse gas emissions that will be locked in by the project, and the lack of value for money when considering a transport infrastructure that is fit for a low carbon future.

We feel supported by the recent decision against a third runway at Heathrow Airport, making the case that all policy must take into account the Paris Agreement and the greenhouse gas reductions that our governments have agreed to and confirmed in law.

We acknowledge that for many of the residents of Llanddewi Velfrey the bypassing of the village would be welcome. However, the costs of this current proposal outweigh these benefits. An alternative project is needed that improves road safety and the quality of life for the residents of the village, and does not increase greenhouse gas emissions.

Objections

The Climate Emergency

We repeat here that our main objection to this scheme is the 8.4% increase in Greenhouse Gas Emissions (GHG) caused by this project¹. These emissions would be locked in for the 60 years life expectancy of the scheme. We emphasise that the Welsh Government and both Pembrokeshire and Carmarthenshire County Councils have acknowledged that we are facing a climate emergency and that in order to protect the world from catastrophic heating we must act now.

The development of this scheme, including the most-recent studies, was undertaken prior to the Welsh Government's declaration of a climate emergency on 29th April 2019². We believe the scheme should be reassessed in the light of the recognised crisis.

As Lesley Griffiths, Minister for Environment, Energy and Rural Affairs, said of this fundamental announcement "Our sustainable development and environmental legislation is already recognised as world leading and now we must use that legislation to set a new pace of change."

We argue that setting a new pace of change requires rethinking any development that will lead to increased greenhouse gas emissions. Transport accounted for 14% of Welsh emissions in 2016, and 85% of these emissions come from road transport.³ The Welsh Government aims to 'encourage a shift from an over reliance on the private car to more sustainable transport modes.' In their low carbon delivery plan 'Prosperity for All: A Low Carbon Wales' the section on transport states that 'the most effective way of reducing CO2 emissions in the near-term will be to replace car journeys

¹ Opening statement by Mr Anthony Vines at the inquiry, 10 March

² <https://gov.wales/welsh-government-makes-climate-emergency-declaration>

³ Welsh Government, n.d., 'Transport: Sector Emission Pathway'

with those using the existing public transport system and active travel.’⁴ This includes the prevention of ‘car-dependent developments’⁵.

This is essential as emission savings from increased efficiency and emission technology are largely offset by increased travel (as has been the case between 1990 and 2016⁶). Transport emissions in fact went up by 3% from 2015 to 2016. Emissions in 2017 decreased slightly again but still remained higher than in 2015. The Welsh Government set itself carbon budgets which aim to reduce overall emissions by at least 80% by 2050, and aim to reduce emissions from transport by 11% by 2020, and by 43% by 2030⁷. This is a tall order requiring decisive action.

Your rebuttal of our original objection does not address how these increased Greenhouse Gas Emissions can be justified.

Your rebuttal in point 2.76 argues that this scheme is not subject to the sustainable transport hierarchy set in WG law because it does not increase traffic. You state: ‘This Scheme is intended to address existing transport difficulties and is not associated with new development. It would not generate additional private motor vehicle trips as would new housing, retail or business development. The transport hierarchy hence has no direct application to road schemes of this nature.’ We argue that this contradicts your own claims that this scheme will benefit the local economy and enable a better access to higher education institutions⁸. So either the scheme is not of wider benefit in these respects or alternatively the sustainable transport hierarchy should hold, positioning private motor vehicles at the bottom of the hierarchy.

*‘A radical transport response to the climate emergency’*⁹ - a paper written by Transport for Quality of Life and endorsed by Friends of the Earth and Greenpeace states: “Because we have left it so late to tackle carbon emissions from transport, we now have to take urgent action. Climate scientists are warning that the carbon targets set by the Committee on Climate Change are too lax and that we need to reach net zero emissions much sooner. But there is an almost total policy disconnect between the advice of these climate scientists and the thinking of the transport policy community, which is working on the relatively comfortable assumption - because it seems so distant - that we have until 2050 to get transport carbon emissions down to zero.

“--in order to be able to meet our obligation to act on climate change, we need to recognise a basic right for everyone to be able to live decently without having to own or drive a car. A transport system for a zero-carbon future must therefore be:

Universal: available to everyone

Comprehensive: the best possible service for all areas, within available resources

Affordable: low-cost, and free for essential local travel

Green: consistent with our obligation to cut carbon emissions to zero in line with the Paris Agreement and to minimise other environmental impacts.”

⁴ Welsh Government, April 2019, ‘Prosperity for All: A Low Carbon Wales’, p. 97

⁵ Ibid.

⁶ Ibid, p. 98

⁷ Ibid, p. 99

⁸ Opening statement public enquiry 10 March, Mr Anthony Vines

⁹ <https://policy.friendsoftheearth.uk/insight/radical-transport-response-climate-emergency>

The Cost of the Scheme

Philip Thiele's summary evidence to the inquiry states that "The economic case for the Scheme indicates poor value for money." (Doc. 1.2.1 - paragraph 8.3). In your rebuttal you confirm this again (Point 2.22).

You make the case that the cost benefit analysis did not include factors that are hard to monetise but support the scheme. It can equally be argued that there are non-monetised factors that have not been taken into account that do not support the scheme. Examples are:

- The impact of the new road on the landscape
- The message that road building sends out in times of a climate emergency, which doubts the commitment of the WG to a zero carbon future
- The loss of established woodlands and habitats (we know this is addressed by new planting, but there will be a considerable time delay before these take effect)
- Health benefits of walking and cycling as part of an integrated transport scheme

Your rebuttal (point 2.22) emphasises the economic benefits of the scheme. There is considerable evidence that road building does not deliver the promised economic benefits. The report 'Transport Fit for Future Generations' published by the Future Generations Commissioner sums up this research:

‘Road schemes:

- Induce traffic, that is, generate more traffic – often far above background trends over the longer term
- Lead to permanent and significant environmental and landscape damage
- Show little evidence of economic benefit to local economies’¹⁰

We continue to believe that money spent on this scheme would be better used improving local transport services, including the bus and train network.

The Transport Sector Emission Pathway: factsheet¹¹, published as part of 'Prosperity for all: a low carbon Wales' details policies to achieve the carbon savings, these include:

- behavioural change (modal shift to more sustainable travel),
- increased travel by rail,
- increased travel by bus,
- reduced need to travel.

In your rebuttal (point 2.36) you argue that public transport links are too poor in the area to provide a realistic alternative option to car travel. There are two points to make here. First, this should be a

¹⁰ ‘Transport Fit for Future Generations’ By the Future Generations Commissioner for Wales, in partnership with the Centre for Transport and Society (CTS), University of the West of England, Sustrans and New Economics Foundation. *September 2018, p. 17*

¹¹ <https://gov.wales/sites/default/files/publications/2019-06/transport-sector-emission-pathway-factsheet.pdf>

very good reason to focus on improving public transport, and active travel links to enable people to access train stations by walking and cycling, and improving bus links to rail stations. The planned housing developments in Llanddewi Velfrey mean an increased demand for better public transport links. In a village with three buses a day there is vast room for improvement here, improvement that would benefit all and not only car owners.

Second, it is an imperative to improve public transport within the carbon reduction aims that the WG has set (such as ‘Prosperity for All: A Low Carbon Wales’)¹². As a consequence public transport will need to be improved and will hopefully become a realistic alternative to car travel within the not so distant future. The report ‘Transport Fit for Future Generations’ emphasises that planning needs to move to an approach that actively shapes the future, and this is a zero carbon future where people are enabled to travel with maximised health benefits and minimised carbon impact.¹³ This includes travelling for tourism, work and to access higher education.

A report published in December 2018 by Campaign for Better Transport, reveals rural transport in a state of crisis, with bus cuts and shrinking transport networks leaving communities cut off, unable to access jobs and services, and creating increasingly congested roads.

‘The Future of Rural Bus Services in the UK’¹⁴ shows the impact of poor public transport on the health and wellbeing of communities and rural economies, and calls for urgent reform to ensure people living in rural areas remain connected to the national transport network.

Integrated sustainable transport systems managed by local authorities in rural Germany, the Netherlands and Denmark provide frequent services rural areas. Services are franchised to local bus and taxi services, but timetables and prices remain under the control of local government (Rural Transport Futures 2003). Many European countries have a levy on road use, an eco-levy on motor ways and trunk roads here would provide funding for public transport.

The railways under Transport for Wales gives an opportunity to take more local control over the system.

Here in Pembrokeshire there are innovative bus services and community transport schemes, such as: Bwcabus where people can book bus at a particular time to pick them up on the bus route, St Davids Pilot Project- Integrative Responsive Transport, a new flexible bus service North of Haverfordwest, “Take Me Too” a community lift sharing scheme, But without funding and grants from the government, these will never provide the alternative to the private car that is needed.

In your rebuttal (point 2.13) you state that two thirds of the funding is from ERDF funds and could not be used for projects not improving the A40. This is insufficient to justify the increased greenhouse gas emissions locked in by this project. It is conceivable to us that this money could be used for an altered scheme improving road safety, encouraging active travel and improving public transport in Llanddewi Velfrey. All three railways in Pembrokeshire are also part of the Trans-European transport network (TEN-T) which is the focus of this funding. Objective 3 of the scheme – “to reduce community severance and provide health and amenity benefits” could be addressed in an alternative way (improving local connectivity with examples such as those just quoted, safe routes for cycles and pedestrians and public transport, a safe crossing in the village such as a bridge with

¹² Welsh Government, April 2019, ‘Prosperity for All: A Low Carbon Wales’, p. 97

¹³ ‘Transport Fit for Future Generations’ By the Future Generations Commissioner for Wales, in partnership with the Centre for Transport and Society (CTS), University of the West of England, Sustrans and New Economics Foundation. *September 2018, p. 15*

¹⁴ <https://bettertransport.org.uk/sites/default/files/research-files/The-Future-of-Rural-Bus-Services.pdf>

widening of pedestrian pavements and traffic calming measures). The remaining third of the funding still is a considerable amount of money that could be diverted into investing in a low carbon transport infrastructure.

The very small journey time savings of 10 and 20 seconds respectively for motorists (see point 2.52 of your rebuttal) do not justify the £39.5 million spent on this road scheme.

In your rebuttal you argue that further speed reductions and traffic calming in the village could have detrimental impacts on the economy of West Wales (point 2.64). There is no evidence to support this claim. As we argue above, a move to a low carbon transport infrastructure shifting traffic off the road needs to be developed rapidly with or without this project. It can also be argued that faster road links can result in a detrimental impact on the local economy, with people travelling out of the area and further for work and shopping.

We still believe that there is no justification for the section from Capel Ffynnon to Penblewin. This part of the road scheme does not benefit the village of Llanddewi Velfrey in any way. In our original objection we made the point that the public consultation¹⁵ conducted in 2006 failed to attract majority public support. This section of the scheme does not contribute to objective 3 - "to reduce community severance and provide health and amenity benefits" since the section of road it would replace is outside the village of Llanddewi Velfrey. The Ffynnon Wood to Penblewin section therefore provides little benefit other than insignificant time savings for motorists at a very considerable financial and environmental cost.

Summary

To sum up our statement, we object to the proposed scheme on the grounds of the increased greenhouse gas emissions that will be locked in for 60 years.

We have however argued that the scheme is not fit for a zero carbon future.

We consider that quality of life in the village could be significantly improved without a bypass, at a much lower cost. The low cost benefit ratio for this project at 0.13 suggests that this public money could be spent with more positive impact.

An alternative needs to be imagined that shapes a future that we want, including improved road safety for the village, but also enhancing local connectivity, active travel and improving public transport links.

¹⁵ <https://gov.wales/sites/default/files/publications/2017-09/a40-llanddewi-velfrey-to-penblewin-statement-of-results-from-public-consultation-2006.pdf>