

Adran Seilwaith yr Economi
Department for Economic Infrastructure



Llywodraeth Cymru
Welsh Government

THE LONDON TO FISHGUARD TRUNK ROAD (A40) (PENBLEWIN TO REDSTONE CROSS IMPROVEMENT AND DE-TRUNKING) ORDER 202-

THE LONDON TO FISHGUARD TRUNK ROAD (A40) (PENBLEWIN TO REDSTONE CROSS IMPROVEMENT) (SIDE ROADS) ORDER 202-

**THE WELSH MINISTERS (THE LONDON TO FISHGUARD TRUNK ROAD (A40) (PENBLEWIN TO REDSTONE CROSS IMPROVEMENT))
COMPULSORY PURCHASE ORDER 202-**

PROOF OF EVIDENCE – PART C - SUMMARY

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WELSH GOVERNMENT, CHIEF WITNESS

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1. Personal Statement

1.1 My name is Nathan Duke. I am a Project Engineer within the Infrastructure Delivery Division of Welsh Government where I am responsible, on behalf of the Welsh Ministers, for the delivery of the transport improvement schemes identified in the Wales Transport Strategy. I have been a Project Engineer for the A40 Penblewin to Redstone Cross Improvements Scheme (hereafter referred to as the Scheme) since October 2019.

1.2 The evidence in this Proof of Evidence is true and the opinions expressed are my true and professional opinions.

2. Scope of Evidence

2.1 This summary Statement covers the background and justification for constructing the Published Scheme which is outlined in more detail in documents (WG 1.1.1) and (WG 1.1.2). In order to assist me in presenting evidence at this Public Local Inquiry, I will rely on the following Expert Witnesses to cover their respective specialist fields:

- a) Philip Thiele BEng (Hons) MRes CEng MICE (Traffic and Economics) (WG 1.2)
- b) Geraint Jones MEng CEng MICE (Engineering) (WG 1.3)
- c) Andrew Sumner CMLI (Environment) (WG 1.4)
- d) Chloe Delgery MSc MPhil CEnv MCIEEM (Ecology) (WG 1.5)
- e) James Bellinger BSc, MSc, CEnv, CSci, MIAQM (Air Quality) (WG 1.6)
- f) Peter Mumford BSc BMus MIOA (Noise) (WG 1.7)
- g) John Davies MBE BSc MRTPI (Planning & Sustainable Development) (WG 1.8).

2.2 I will also rely on the following proof of evidence which is contained within an appendix in Andrew Sumner's proof of evidence:

- h) Mr Tony Kernon BSc(Hons), MRICS, FBIAC (Agriculture)

3. Published Draft Orders

- 3.1 Draft Orders set out the necessary rights and land needed for the Welsh Government to implement the Scheme.
- 3.2 The Environmental Statement identifies the main environmental effects of the Scheme and describes the proposed measures to avoid, remedy or reduce effects and provide environmental enhancement where practicable.
- 3.3 The draft Line Order (Doc. 2.01.01) and draft Side Roads Order (SRO) (Doc. 2.02.01) were published on 29 July 2020 and the draft Compulsory Purchase Order (CPO) (Doc. 2.03.01) was published on 05 August 2020. The objection period for all of these ended on 9 September 2020. In addition, an Environmental Statement (Doc. 3.01.01) together with a Statement to Inform an Appropriate Assessment (SIAA) (Doc. 4.6.12) was published on 29 July 2019.
- 3.4 I confirm that the Welsh Government gave notice of its intention to hold this Public Local Inquiry (PLI) to all objectors individually on 25 September 2020 in accordance with The Highways (Inquiries Procedure) Rules 1994 (Doc. 4.01.75) and The Compulsory Purchase by Ministers (Inquiries Procedure) (Wales) Rules 2010 (Doc. 4.01.76).

4. Background

- 4.1 In November 2001, the National Assembly for Wales published the Transport Framework for Wales¹. This outlined that the east-west transport corridor in West Wales had been the subject of a multi-modal study in the 1990s, which concluded that the A40 west of St Clears was in need of improvements.

¹ The National Assembly for Wales, The Transport Framework for Wales, (November 2001)

4.2 In March 2002, the Trunk Road Forward Programme (TRFP) (Doc. 4.01.44) was published which included the A40 West of St Clears. The TRFP stated:

'Improvement of the A40 trunk road, whether it be to single or dual carriageway standard, is beneficial in economic terms. Improvement to the road would not affect the number of people travelling on public transport significantly...

The A40 in West Wales forms the lowest standard section of the Trans European Road Network (TEN-T) in the United Kingdom and there are major problems associated with upgrading the freight carrying capacity of rail in this area which means that significant improvement in the foreseeable future is not viable...

We are therefore satisfied that improvement to the A40 between St Clears and Haverfordwest is needed and that economic benefits will accrue. Upgrading the road to dual carriageway standard is likely to be justified but before a decision is finally made, we need more information on the environmental implications associated with alternative standards.'

4.3 A Route Options Report (ROR) (Doc. 4.02.01 and 4.02.02) was commissioned subsequently to explore single and dual carriageway options.

4.4 The ROR concluded that a number of route options should be discarded for reasons including:

- a) cost;
- b) major adverse environmental impact (woodland habitat); and
- c) not addressing the identified overtaking and severance problems.

4.5 Other routes that performed better in addressing the problems balanced with their likely economic, social and environmental impacts, were taken forward for further consideration in a Technical Appraisal Report (TAR) (Doc. 4.02.03), which was subsequently undertaken.

4.6 In July 2013, Edwina Hart AM CStJ MBE, Minister for Economy, Science and Transport, published a written statement outlining her priorities for Transport. The statement included the following:

“Improving the A40 has been identified as a priority by the Haven Waterway Enterprise Zone Board and I intend to undertake further development of previously proposed improvements.”

4.7 The Welsh Government then commissioned a further study in 2015, which updated work completed previously. The 2015 study further considered the need for the A40 improvements and appraised a number of options using WelTAG 2008 guidance. This included options at Redstone Cross Junction .

4.8 The 2015 study included an Economic Activity and Location Impacts (EALI) Report. This report explained whilst the A40 may be seen as an important local issue, it is unlikely that a conventional Transport Economic Efficiency (TEE) analysis would generate a positive Net Present Value (NPV) and Benefit-Cost Ratio (BCR) for a Scheme of this nature given the relatively low traffic volumes. The report clarified that EALI Guidance states that:

“It is important to recognise that perceptions of problems with the transport system by users, operators, the public at large and politicians can be equally as important as problems that can be quantified through analysis of data”.

4.9 In February 2017, the Welsh Government appointed Carillion to develop a solution to address the transport related problems along the A40 between Llanddewi Velfrey and Penblewin Roundabout. Carillion were supported by Arup and RML as technical and environmental advisors.

4.10 Further study from 2017 resulted in the completion of a WelTAG Stage 3 report in accordance with WelTAG 2017 guidance, focusing on the A40 Llanddewi Velfrey to Penblewin Improvements. The Publication of Draft

Orders and the supporting Environmental Statement (ES) took place in 2019 and this scheme went through Public Inquiry in March 2020. Welsh Government have received the Inspector's report and are considering the recommendations made.

4.11 As part of the A40 Llanddewi Velfrey to Penblewin Improvements study, a public information exhibition held in 2018 alongside a stakeholder engagement exercise, invited attendees to share their thoughts on the potential extension of the proposed Llanddewi Velfrey to Penblewin Scheme to include the section to Redstone Cross Junction. A total of 51 responses submitted via completed comment forms supported such a need whilst only 4 comments expressed some reservations / concerns about the Redstone Cross Junction proposal to be included as part of the Scheme.

4.12 In August 2018 the Cabinet Secretary for Economy and Transport, Ken Skates AM, confirmed in writing to the HM Senior Coroner as part of this response to the inquest into the death of a driver joining the A40 at Redstone Cross Junction², that:

“there is a risk of future deaths at this location unless appropriate action is taken... Preliminary investigations have begun to develop further overtaking opportunities & safety improvements along the length of the A40. This includes improvements at Redstone Cross. These additional A40 improvements are included in the update of the National Transport Finance Plan (NFTP)³”.

4.13 Arup (supported by RML) was instructed by the Welsh Government in January 2019 to develop a solution to address the transport related problems along the A40 between Penblewin Roundabout and Redstone

² <https://www.judiciary.uk/wp-content/uploads/2018/09/2018-0242-Response-by-Welsh-Government.pdf>

³ <https://beta.gov.wales/sites/default/files/publications/2017-12/national-transport-finance-plan-2017-update.pdf>

Cross Junction. Supporting the Penblewin Roundabout and Redstone Cross Junction Scheme is this WeITAG Study.

4.14 Although the design development and consenting of the schemes is being undertaken separately, the Welsh Government intend to deliver both the A40 Llanddewi Velfrey to Penblewin Improvements and A40 Penblewin to Redstone Cross Improvements as one Scheme during construction.

5. The Need for the Published Scheme

5.1 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.

5.2 The Welsh Transport Appraisal Guidance (WeITAG) study (Doc. 4.03.03, 4.3.04, 4.3.07, 4.3.08) identified a range of actual and perceived problems to be addressed on the A40 between Penblewin Roundabout and Redstone Cross Junction, which were:

- a) The A40 Redstone Cross Junction is below modern design standards. Poor visibility and sub-standard junction layout can lead to severe road accidents.
- b) Limited overtaking opportunities lead to poor journey time reliability and driver frustration.
- c) Occasional convoys of heavy goods vehicles from the ferry ports and slow-moving agricultural vehicles can contribute to period of platooning and journey time unreliability, which is exacerbated with limited overtaking opportunities.
- d) Seasonal variations in traffic volumes along the A40 especially during the summer months can lead to slow moving traffic causing journey time unreliability, which is exacerbated with limited overtaking opportunities.

- e) There are many side road junctions and direct accesses to properties and agricultural fields off the A40, which can contribute to operational problems along the road.
- f) A mix of traffic types using the road, can contribute to journey time unreliability and driver frustration, risky manoeuvres and collision incidents.
- g) A lack of strategic public transport connectivity in Pembrokeshire generally means there is a dependence on the private car for inter-urban connections.

6. Objectives of the Published Scheme

- O1** To enhance network resilience and improve accessibility along the east-west transport corridor to key employment, community and tourism destinations.
- O2** To improve prosperity and provide better access to the county town of Haverfordwest, the Haven Enterprise Zone and the West Wales ports at Fishguard, Milford Haven and Pembroke Dock.
- O3** To reduce community severance and provide health and amenity benefits.
- O4** To improve the Redstone Cross Junction safety (including perceived safety) and reduce the number and severity of collisions.
- O5** To promote active travel by cycling, horse riding and walking to provide opportunities for healthy lifestyles.
- O6** To deliver a Scheme that promotes social inclusion and integrates with the local transport network to better connect local communities to key transport hubs.
- O7** Deliver a project that is sustainable in a globally responsible Wales, taking steps to reduce or offset waste and carbon.
- O8** Give due consideration to the impact of transport on the environment and provide enhancement when practicable.

- 6.1 In accordance with Welsh Transport Appraisal Guidance (WelTAG 2017), an objectives-led approach has been adopted. This means that a Scheme's inception starts by identifying problems and opportunities and defining what is to be achieved.
- 6.2 In developing the objectives, a review was undertaken against the well-being goals as presented within the Well-being of Future Generations (Wales) Act 2015 (WFGA 2015) (Doc. 4.01.10), helping to ensure that the Scheme objectives align to the wider sustainable development principle of the Welsh Government, and take into account the needs of Wales' future generations.

7. Description of the Published Scheme

- 7.1 The Scheme would comprise a 1.8km long WS2+1 carriageway cross-section, which provides 2 lanes in one direction to allow overtaking, and one lane provided in the opposite direction.
- 7.2 The Scheme would commence approximately 550 metres west of Redstone Cross Junction (Chainage (Ch) 0+000), where the existing ascending A40 passes Sodston Lodge. The Scheme would leave the line of the existing A40 at Sodston Lodge and draw gradually to the south. At approximately Ch0+400 the road would cross a small wooded watercourse on an embankment up to 4 metres high. It would then begin to descend on a gentle gradient for about 1km, entering a cutting up to 7 metres deep through the Redstone ridge at Ch 0+500. To the north side of the Scheme would be properties at Redstone Cross Junction and to the south the Blaenmarlais Care Home. The B4313 Redstone Road would cross the A40 on a proposed bridge at Ch.0+570 and then join the de-trunked A40 on the east side of Redstone Cross Junction. The de-trunked existing A40 road would be a local road extending from Redstone Cross Junction to Penblewin Roundabout.
- 7.3 From Ch. 0+570 to Ch 0+800 the Scheme, still descending, would transition from cutting to embankment and continue the gentle left-hand

curve to cross a small watercourse at around Ch. 0+860. Here the Scheme would gradually transfer from cutting to embankment to cross lower-lying land occupied by woodland. The embankment would continue eastwards, crossing a further two minor watercourses, with the Scheme entering a shallow right-hand bend which would continue to Ch.1+450. At Ch+400 the embankment would cease, and the Scheme would continue east in a cutting up to 8m deep as it commences the climb towards Penblewin Roundabout at Ch. 1+760, which is roughly at ground level.

Overbridge for the B4313 Redstone Road (Narberth to Bethesda)

- 7.4 The proposed bridge would carry the B4313 Redstone Road across the proposed Trunk Road (Ch. 0+570), which at that point would be in a cutting up to 7m deep. The bridge would be sufficiently wide to carry the existing road with hardened verges to be consistent with the existing road width. The bridge would be a single span structure with abutments, constructed from concrete with precast concrete beams.

Penblewin Roundabout

- 7.5 At Penblewin Roundabout, the Scheme would re-join the A40 Trunk Road at the enlarged roundabout previously proposed for the Llanddewi Velfrey to Penblewin Improvements scheme, which forms a separate set of Draft Orders. The enlarged roundabout would extend further north and west than the existing and would serve the A40 Trunk Road, the A478 and the Trunk Road link to the Penblewin Rest Area. In addition, a sixth arm would be required for a new short link to the de-trunked A40 west to Redstone Cross Junction.

8. Environmental Appraisal and Mitigation

- 8.1 The assessment of environmental impacts and effects of the Scheme, including consideration of the construction phase, are reported in detail in the Environmental Statement (ES) (Doc. 3.00 series) together with the

proposed mitigation measures. A Record of Determination, which outlined the process undertaken for determining whether an Environmental Impact Assessment (EIA) is required and is included within Appendix 4.3 of the ES (Doc. 3.02.03).

9. Sustainable Development

9.1 The Sustainable Development Report (Doc.4.03.09) examines the extent to which the selection and development of the Scheme adhered to the sustainable development principles set out in the WFGA 2015, concluding that the selection and design of the Scheme did accord with the five ways of working. The report also shows how the Scheme would contribute to the seven well-being goals of the WFGA 2015 and the delivery of the Welsh Government's Well-being objectives set out in the Well-being Statement 2017⁴ (Doc. 4.01.79).

10. Improvements to the existing A40 (to be detrunked)

10.1 The Line and Detrunking Order Plan (Doc. 2.01.03) shows the extents of the existing A40 trunk road that would be detrunked, with the ownership and maintenance responsibilities being transferred from Welsh Government to the local highway authority, Pembrokeshire County Council.

10.2 The forecast 82% reduction in traffic between Penblewin Roundabout and Redstone Cross Junction with the Scheme in place (Doc 4.05.03), provides opportunities to amend the highway layout.

10.3 The Welsh Government sees the proposed improvements enabled by the detrunking of the existing A40 as complementary to the Scheme and draft Orders. The improvement works do not form part of the draft Orders and no land take is necessary within the CPO for the proposals. Geraint Jones describes the improvements in his evidence (WG 1.3.2).

⁴ Welsh Government, Prosperity for All: the national strategy, (September 2017) (Doc. 4.01.12)

The Active Travel and Detrunking Proposals Report (Doc. 4.04.07) outlines the concept layout for the proposals.

10.4 The details and delivery mechanism of the proposed improvements to the existing A40 enabled by the detrunking will be explored further with PCC.

11. Construction

11.1 Subject to the satisfactory completion of the statutory procedures, a Design and Build (D&B) contractor would be procured for the detailed design and construction of the Scheme. Construction is expected to take approximately 18 months commencing in summer 2021 with completion at the end of 2022.

11.2 A Buildability Report (Doc. 4.04.09) has been prepared which provides an outline construction methodology for the Scheme, including phasing / sequencing diagrams at key interface locations.

11.3 Maximising the community benefit of major infrastructure schemes is a key requirement of the Welsh Government. The contract to be awarded for the detailed design and construction of the Scheme would include requirements for Community Benefits, and the appointed contractor would be required to maximise the impact of public spending in the local communities during construction. This would include targets for: recruitment, provision for training, apprenticeships and education, and use of a local supply chain.

12. Land Acquisition and Compensation

12.1 The land-take and rights to be acquired shown in the CPO is the minimum necessary to construct, mitigate, operate and maintain the Published Scheme. Land required only during the construction phase for temporary works has been separately identified in the Welsh Government letters, which accompanied the publication of the CPO.

12.2 The provisions of the Acquisition of Land Act 1981 (Doc. 4.01.04) would apply.

13. Summary of Support, Objections and Representations

13.1 The publication of draft Orders provided the opportunity for any person or organisation to object, support, or suggest alternatives to the Scheme. In summary, at the time of writing evidence:

- a) 3 unique correspondence letters or emails have been received that clearly express support for the Scheme;
- b) 6 unique correspondence letters or emails have been received that clearly express that the respondents do not object to the Scheme;
- c) 22 unique objections to the Scheme have been received, of which 8 have been classed as being from statutory objectors; and;
- d) 3 objections have since been withdrawn by the respective consultees.

14. Conclusions

14.1 The Scheme is in accordance with the Welsh Government's priorities for transport, as outlined in my Statement of Case Part A - Policy Statement (WG Ref 1.1.1).

14.2 The proposals would meet the Scheme objectives and provide a highway designed to modern standards, with improved safety, greater overtaking opportunities and more reliable journey times.

14.3 The Scheme has been developed as a result of comprehensive assessment and stakeholder involvement, undertaken over the course of many years.

14.4 The Scheme improves access for people and goods along the east - west transport corridor and improves access to: the tourist economy of Pembrokeshire, the port of Fishguard and Milford Haven, and the Haven Waterway Enterprise Zone.

- 14.5 The Scheme addresses the problems identified as part of a WelTAG Study (Doc. 4.03.03, Doc. 4.03.04, Doc. 4.03.07, Doc. 4.03.08), and best meets the objectives set out as a result of that study: it improves the performance of the A40 as a TEN-T route and improve the resilience of the trunk road network in south Wales.”
- 14.6 The ES (Doc. 3.00 series) highlights adverse and beneficial impacts and residual effects associated with the Scheme under a number of environmental topic headings. It also describes how any adverse effects would be mitigated through works integrated into the Scheme. These include: new areas of woodland planting, the provision of landscaping bunds and measures to mitigate the ecological impact.
- 14.7 All objections have been considered and responses presented on each point raised. Welsh Government have, where practicable, taken steps to mitigate impacts.
- 14.8 Whilst the Welsh Government recognises that the Scheme would have an impact on people’s right to land, this needs to be considered against the local and regional benefits that the Scheme would deliver which are in the wider public interest.
- 14.9 At the PLI, the Welsh Government will invite the Inspector to consider this Statement of Case and those of the Expert Witnesses and to recommend to the Minister for Economy and Transport that the published Line, Side Roads and Compulsory Purchase Orders are made, taking into account the corrections and modifications presented at the Inquiry.
- 14.10 As set out in my Proof of Evidence, and as set out in the Proof of Evidence of my expert witnesses, the Welsh Government considers that there is no impediment to the Scheme being implemented.