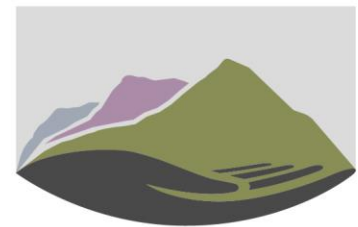


Matt Jones BEng CEng MICE
National and International Connectivity
Welsh Government
By email: Matthew.Jones@gov.wales



**Cymdeithas Eryri
Snowdonia Society**

For the attention of:

Dr Lynn Sloman MBE; Chair, Roads Review Panel

 Caban, Yr Hen Ysgol, Brynrefail,
Caernarfon, Gwynedd LL55 3NR
 01286 685 498
 info@snowdonia-society.org.uk
 www.snowdonia-society.org.uk
www.cymdeithas-eryri.org.uk

Cymdeithas Eryri is Snowdonia's conservation charity, established in 1967. Our focus is on:

- action to protect and enhance the special qualities of Eryri
- supporting responsible and sustainable enjoyment of beautiful landscapes.
- opportunities for young people to build skills, knowledge and experience through volunteering, accredited training, work experience and paid employment.
- working in close partnership with public & third sector and businesses to care for Eryri.

Our charitable objective is to protect and enhance the special qualities of Snowdonia and to promote their enjoyment in the interests of all.

22nd September 2021

Llanbedr access road: input from Cymdeithas Eryri Snowdonia Society

We are writing to you about the proposed Llanbedr Access Road which you have been asked to assess urgently as part of the Roads Review. The Snowdonia Society warmly welcomes the Roads Review and we are grateful for the opportunity to submit our views.

Background

In submissions to planning processes we've highlighted that a Llanbedr bypass was not among the '*Transport Network Developments*' identified in the Anglesey and Gwynedd Joint LDP adopted in July 2017, nor in the Eryri Local Development Plan 2007 – 22, either as a firm proposal or in the form of a 'safeguarded' route.

In April 2019 Welsh Government's Principal Transport Planner for North Wales wrote¹ to the Society confirming that:

¹ Copy available on request **Cymdeithas Eryri the Snowdonia Society**
1967 - 2017

‘When Welsh Government funding was provided to Gwynedd for this scheme for the financial year 2018-19, it was made clear that any future funding would be required to be supported by an updated business case. I expect the Council to provide information from the Stage 3 appraisal in support of any future application for funding for the construction of the scheme.’

Current (2017) WelTAG guidance says: *‘the purpose of Stage 3 is to make a full and detailed assessment of the preferred option to inform a decision as to whether or not to proceed to implementation’.*

In April 2020 we wrote to Gwynedd Council asking about progress on WelTAG Stage 3 and asking how we could input as stakeholders. Gwynedd Council’s Head of Environment replied² in May 2020, confirming that Gwynedd Council would *‘ensure that the Snowdonia Society have an input into the process’.*

In October 2020 Ken Skates, then Minister for the Economy, Transport and North Wales publicly announced £7m additional Welsh Government (WG) funding for this new road³. The fact that the Minister made this announcement in the absence of a WelTAG Stage 3 Business Case led the Snowdonia Society to make a complaint to the First Minister that Mr Skates had breached the Ministerial Code. The First Minister did not agree, but his office did confirm to us in writing⁴ that a WelTAG Stage 3 Business Case would be required before Welsh Government funding would be made available.

Having heard nothing further, we contacted Gwynedd Council again in September 2021 and we now have a meeting with YGC (Gwynedd Council’s in-house consultancy) scheduled for 25th October 2021 to discuss WelTAG Stage 3.

Years have elapsed since Welsh Government confirmed it as a funding prerequisite, but a WelTAG Stage 3 Business Case for Llanbedr access road has not yet been completed. We understand that a draft is in production and is expected to be finished by the end of October 2021. We have not yet seen a draft nor had any opportunity to contribute or comment.

WelTAG Guidance 2017 emphasises the importance of consultation throughout the WelTAG process. Page 6 states that *‘during the more detailed design and assessment of shortlisted options, engagement with the public and other stakeholders **will assist in gathering evidence on the impacts of each of the proposed options and the consequences of doing nothing**’* (our emphasis).

This is relevant to the ‘special case’ questions for Llanbedr as part of the Roads Review, which ask whether sufficient consideration of options and impacts has taken place.

² available on request

³ <https://media.service.gov.wales/news/over-gbp-7m-awarded-for-llanbedr-airfield-access-road>

⁴ available on request

On July 6th 2021 the Future Generations Commissioner wrote⁵ to the Deputy Minister for Climate Change questioning the basis for exemptions to the Roads Review process. The letter also identifies concerns about the alignment of WelTAG with the Wellbeing of Future Generations Act and the implementation of WelTAG including stakeholder involvement; Llanbedr is among the examples noted.

WelTAG Stage 1 assessment

The Llanbedr Access Road scheme results from a WelTAG Stage1 process completed in 2015, using WelTAG 2008 guidance. The document's Policy Context (Section 1.7, p12) references the 2008 Wales Transport Strategy and the Welsh National Transport Plan 2010, both now superseded.

The policy context is dramatically different today, with the Well-being of Future Generations (Wales) Act in 2015; the Active Travel (Wales) Act in 2013; 'Prosperity for all: a low carbon Wales' published in 2019; Welsh Government's declaration of a climate emergency in April 2019; the Senedd declaring a biodiversity emergency in June 2021; and Llwybr Newydd, the Wales Transport Strategy, published by Welsh Government earlier this year.

The Llanbedr WelTAG Stage 1 report is entirely premised on road transport. Minimal consideration is given to non-road transport options, other than active travel. There is, for example, an under-utilised operational railway line nearly adjacent to the Enterprise Zone site, but the WelTAG Stage 1 report does not discuss this as a transport option. The report considers 'do nothing' and 'traffic management' options, but discounts both as not meeting the identified road transport objectives; in this respect the report is a self-fulfilling prophecy.

The section on greenhouse gas emissions (Section 5.4.5, pp 40 &41) is almost devoid of content. Even in 2015 this deficiency should have been a cause for concern.

The direct benefits identified in the Stage 1 WelTAG assessments are at best marginal. A 49 second anticipated time saved in transiting Llanbedr is scored as a 'slight' positive, and surprisingly the preferred option envisages an increase in injury collisions.

When Welsh Ministers issued PAG 115/20 concerning active travel and the trunk road network, they stated that consideration must be given to updating or re-running WelTAG studies which are greater than three years old. This guidance applies to active travel and trunk roads, but the principle is transferable.

The Llanbedr WelTAG documents should in our view be granted 'legacy' status. They give no proper consideration to options other than building a new road, or to more sustainable means of transport. They do not present any substantial evidence on the impact of the scheme on greenhouse gas emissions.

⁵ <https://www.futuregenerations.wales/news/future-generations-commissioner-for-wales-asks-for-explanation-into-road-freeze-exemptions/>

WelTAG Stage 3?

Some of this outdated thinking in WelTAG Stage 1 may be addressed by the WelTAG Stage 3 report when it is produced. However, the WelTAG Stage 3 report will consider only a single 'new road' option since it arises directly from the 2015 WelTAG Stage 1. As a process this is not consistent with Llwybr Newydd, or the principles underlying PAG 115/20 and it fails to recognise or respond to the reality of the declared climate emergency.

Without sight of the WelTAG Stage 3 Business Case, it cannot be assumed that the project stands up to scrutiny. Compulsory land purchase has not been completed. To our knowledge, the only significant practical work to date is in preparation for a new structure as mitigation for the planned destruction of a bat roost. We are not aware of any recent studies that identify Llanbedr as suffering from particularly adverse traffic problems compared with other settlements on the A496, or indeed in Wales generally. Unless substantial traffic generating development takes place on the Enterprise Zone, there is nothing notable about Llanbedr's transportation issues that would justify the proposal.

The purpose of the Roads Review is to ensure that investments are aligned with Welsh Government's new and forward-looking approach to the sustainability of transport. The fact that EU funding is available should not unduly influence a principled decision to proceed with or halt this scheme. It does not seem to us appropriate to exclude this scheme from the panel's full assessment criteria because of the existence of a single piece of funding.

The Llanbedr WelTAG provides insufficient answers to the two questions specified by Welsh Government for the 'fast-tracking' of Llanbedr by the Roads Review Panel. In consequence the Llanbedr Access Road should not be considered a special case. In our view this road scheme should be assessed against the five published objectives⁶ of the Roads Review, using the criteria which the Panel develops.

A new road in a National Park

In 2018 Welsh Government's 'Valued and Resilient'⁷ policy statement outlined ambitions for National Parks and their roles in decarbonisation and halting the loss of biodiversity.

National Parks exist to protect areas of outstanding natural beauty and provide opportunities for their enjoyment. They have a duty to support an economic future for those who live and work in the area. We support both the statutory purposes and that socio-economic duty.

In the Welsh Government Capital Transport Grant 2018-19 Scheme Application Form⁸ the Llanbedr scheme is described as being of 'National Significance'. By contrast in the 2018 planning application the scheme was described and dealt with as being of 'local importance'

⁶ <https://gov.wales/roads-review-panel/terms-reference>

⁷ <https://gov.wales/written-statement-valued-and-resilient-welsh-governments-priorities-areas-outstanding-natural>

⁸ <https://gov.wales/sites/default/files/publications/2020-04/ATISN%2013858%20-%20Doc%203.pdf>

only, and thus gained planning permission without being subject to the National Park's Major Development policy test.

While the world has changed dramatically in recent years, it seems the Llanbedr access road proposals have not.

In our view the 2015 WelTAG Stage 1 report for Llanbedr fails to demonstrate sufficient consideration of either of the key questions:

Has sufficient consideration been given to non-transport solutions and solutions other than those increasing private car capacity on the road network?

Has sufficient consideration been given to whether the road proposal will lead to increased CO2 emissions on the road network, or cause significant impediment to achievement of our decarbonisation targets?

This road is not a special case in any meaningful sense. It should be fully reappraised against current government policy. We accept that it might be possible, even in a National Park, to make a business case for a new road consistent with the sustainable development principles enshrined in Llwybr Newydd, but this should be the option of absolute last resort rather than the default option as it was in 2015.

Thank you once again for the opportunity to submit our views.

John Harold

Director, Cymdeithas Eryri Snowdonia Society



Peatland restoration – Cymdeithas Eryri volunteers and partners working together for a brighter future