

Barry & Vale Friends of the Earth
Cyfeillion y Ddaear, Y Barri/A'r Fro
14, Robert Street, Barry, CF63 3NX

E-mail <[REDACTED]>



Cyfeillion y Ddaear

Case Officer Mr I Robinson,
Planning Dept., Vale of Glamorgan Council

14 Dec. 2016

2016/00305/RG3 VoG (A4226 Five Mile Lane Highways Improvements)

Our letter of 1st Nov. with questions and requests for further information has been inadequately reported. It was not posted on the website by 13 Dec (midnight) so is not available within the 3-days required.

A new strategic highway. The assessment failed to assess it as creating a strategic highway. The VoG advertised it as a departure from the development plan only after our letter of 1st Nov. There's failure to re-assess it as such, in particular the design to use a hardly-improved, badly congested junction at Waycock Cross.

Pointing out the Parsons-Brinckerhoff transport assessment's data on severe congestion, (queues of 200 vehicles and more predicted at peak), we asked for evidence that "this is acceptable to the Council as Highways Authority". The Planning Officer has not supplied evidence or answered why in his report. The VoG Highways department could have objected and forced the Welsh Government to consider 'strategic' alternatives.

Such alternatives are obvious, cut across west to join the A4050 at the airport turn, or upgrade Waycock Cross with grade separation/ slip-road. The Environmental Statement's EIA-appraisal has to set out alternatives considered and say why they were dismissed. It omits to do this. The only 'alternatives' it gives for this A4226 road are small variations in engineering design of the new section. The omission of alternatives to meet the congestion problem is a critical deficiency of the ES/EIA.

The design for a 60mph strategic road omits the interests of pedestrians, cyclists and bus-users:

says it provides no facilities for walking – the 2-m cycleway would have to be used by walkers, but is substandard on the Welsh 'Active Travel' standards

it omits any provision for buses – ie. Bus-stops and bus pull-ins.

the side road junctions with ghost islands rather than real islands are less safe for pedestrian, bus and cyclist crossing (for the reason that they wish to avoid slowing of the 60mph traffic).

the most-used and most-needed walking route to the Hawking Centre (and College Annex) is poor design and includes no safe crossings; the original layout to the east of the road is better for the environment and avoids walkers/cyclists having to cross short of the Sutton Farm junction.

These design features do not accord with the Active Travel (Wales) Act 2013. The consultants used wording and took over material from before the Act came into force in Sept. 2014, apparently without review to accord with the new legal duties for highways authorities to consider the needs of walkers and

cyclists and make better provision for them. The VoG Highways officers appear not to have made the 'Active Travel' case for local users.

Avoid or minimise damage to archaeological and nature interests: alternative design that meets the Council planning/conservation duty has been given little or no weight. would damage ("large adverse impacts") three known archaeology sites (Whitton Lodge Roman villa, ring ditch, Iron Age/Romano-British settlement), with "potential for an extensive burial ground with national significance" (says the consultant's report). It also damages nature conservation sites – takes one acre from the Barry SSSI Woodlands and further land from two SINC's (near Whitton Rosser and Blacklands farms). Alternatives to minimise the damage to nature have not been considered as the law requires; it is faulty in law to choose 'mitigation' via new planting rather than avoiding loss of a large are of the SSSI.
