

Petition P-05-690

Resurfacing of the A40 Raglan- Abergavenny Road

October 2018

1. Introduction

This report summarises the Petitions Committee's consideration of a petition which calls for the concrete surface of the A40 road between Raglan and Abergavenny to be replaced with whispering tarmac. It covers the evidence received by the Committee and the recommendation it has made.

The petition

1. Petition P-05-690 Resurfacing of the A40 Raglan-Abergavenny Road was submitted in March 2016 by Sara Jones, a local Councillor representing Llanover Ward on Monmouthshire County Council.

Petition Text:

This petition calls on the Welsh Government to replace the old concrete surface on the A40 road from Raglan to Abergavenny with whispering tarmac.

The Noise Action Plan (2013-18) states that this road is a priority, after the consultation responses received and the measurements taken. Yet no progress has been made despite repeated calls from residents, the local County Councillor, Assembly Member and Member of Parliament.



We, the undersigned, state that this road should be given immediate priority, given the numerous concerns raised from both public and representatives and that it has been identified under the existing Welsh Government Noise Action Plan.¹

2. The petition collected 22 signatures on the Assembly’s website.² Around the same time a petition on this subject also collected 142 signatures on another e-petitions website. The Committee considered the issue for the first time on 13 September 2016.

3. The petitioner, a number of local residents and the local Assembly Member and Member of Parliament, have been campaigning for more than 10 years for this stretch of dual carriageway to be resurfaced with “whispering tarmac” due to what they describe as the “persistent and invasive” noise levels experienced by local residents.³

Regulatory Background

4. The Welsh Government is the highway authority for the Welsh trunk road and motorway network. It is responsible for the maintenance and improvement of the network, which includes the stretch of the A40 between Raglan and Abergavenny.

5. The South Wales Trunk Road Agency (SWTRA) is responsible for day to day operation, maintenance and minor improvement of the network, working in partnership with local authorities. The Welsh Government directly plans, manages and delivers major trunk road improvement and new road schemes.

6. The Environmental Noise Directive (2002/49/EC)⁴ establishes a common approach to the assessment and management of environmental noise. It was implemented through the Environmental Noise (Wales) Regulations 2006⁵ and the Environmental Noise (Wales) (Amendment) Regulations 2009.⁶ The Regulations require the Welsh Government to produce strategic noise maps for urban agglomerations (populations greater than 100,000 people), major roads

¹ [P-05-690 Resurfacing of the A40 Raglan-Abergavenny Road](#)

² This was a sufficient number to allow it to go forward for consideration by the Petitions Committee at that time. Since March 2017 petitions have required a minimum of 50 signatures.

³ [Correspondence from local residents to the Committee](#), published 8 March 2018

⁴ [European Union, Environmental Noise Directive \(2002/49/EC\)](#)

⁵ [Environmental Noise \(Wales\) Regulations 2006](#)

⁶ [Environmental Noise \(Wales\) \(Amendment\) Regulations 2009](#)

and major railways, and to draw up action plans for these. The Noise Action Plan for Wales 2013-2018 was published in December 2013.⁷

7. The A40 between Raglan and Abergavenny, a distance of approximately 10 miles, is one of three stretches of concrete trunk road identified in the Noise Action Plan. It notes that:

“Road traffic noise is highly dependent on the nature of the road surface, particularly at high speeds, and concrete is the noisiest surface to be found nowadays on the Welsh trunk road network.

There are three stretches of concrete trunk road remaining in Wales: the A465 between the Aberdulais interchange and Cwmgwrach roundabout; the A40 between Raglan and Abergavenny; and the A4232 between Culverhouse Cross and Junction 33 of the M4.

In 2013 the South Wales Trunk Road Agent commissioned noise assessments for all three remaining stretches of concrete trunk road. The measurements taken showed elevated noise levels along all three roads. In addition, the 2012 noise mapping has flagged parts of the concrete A465 and A4232 as candidate priority areas, and fourteen responses to the consultation on this plan concerned excessive noise from the concrete A40, including from residents of three different villages and the managing director of a residential home. All fourteen strongly advocated an improved road surface.

In light of the consultation responses and the measurements taken, all the residential properties situated along the three concrete stretches of trunk road will be listed as priority areas under this action plan. The timing of any resurfacing will be dependent on the budgets available to the Welsh Government for carrying out such work.”

8. The Environmental Noise Directive provides for the strategic noise maps to be reviewed, and revised if necessary, at least every five years.

2. Consideration by the Petitions Committee

9. A number of local residents have provided submissions to the Committee describing the impact of noise from the A40:

⁷ Welsh Government, [A Noise Action Plan for Wales 2013-2018](#)

- “The noise from the road is constant throughout the day and during the night until 3am when it stops for roughly an hour.”
- “The noise during the day spoils our enjoyment of our garden during the summer [...] We are unable to hold conversations when in the garden and are unable to open our windows during the night because of the constant noise.”
- “We live [...] in a well insulated house with triple glazing, but are still aware of the increasingly loud noise of the A40 [...] When we built the house we were able to sleep with windows open, use our balcony and garden without undue stress. Unfortunately this is no longer the case.”
- “We appreciate that the road was in place when we built here and accepted the level of road noise at that time. However, the volume of noise on the concrete surface, especially of heavy vehicles, has increased beyond imagining and is now at an unacceptable level.”
- “Almost every night we are wakened between 4-4.30am when convoys of HGVs use the road, and find difficulty in getting back to sleep. This is particularly bad on Monday mornings.”
- “The road noise affects all the communities alongside the A40, as it is weather directional. The Bryn and Bryngwyn are the larger populations beside the A40 but there are many smaller hamlets and individual properties. All have to be treated as the whole, and in the same way.”⁸

10. Several residents also raised concerns that noise levels may worsen further once work to improve the A465 Heads of the Valleys road is completed, as they believe it could increase the number of Heavy Goods Vehicles (HGVs) using the A40 to avoid congestion on the M4.

11. Throughout the Committee’s consideration of this issue the petitioner and the Assembly Member for Monmouth, Nick Ramsay AM, have referenced previous correspondence received from Welsh Government Ministers, which they have argued included commitments to address noise from this section of the A40. In particular, this included a letter from Edwina Hart MBE CStJ AM, then Minister for Economy and Transport to the petitioner in November 2014. This confirmed that, as the A40 between Raglan and Abergavenny had been listed as a Priority 1 area

⁸ [Correspondence from local residents to the Committee](#), published 8 March 2018

under the Noise Action Plan, a scheme to resurface the road was being designed and would be carried out if funding was available in 2015/16.⁹ Nick Ramsay AM told the Committee that he had received similar correspondence from Alun Davies AM, then Minister for Natural Resources and Food, in December 2013.¹⁰

12. However, the current Cabinet Secretary for Economy and Transport, Ken Skates AM, has informed the Committee that there are no current plans to resurface this stretch of road. In his initial response to the Committee in August 2016, the Cabinet Secretary stated that:

“The A40 at this location is not life expired and there are currently no plans to resurface this section.

The section, adjacent to Raglan Castle, has not been identified as an area requiring noise mitigation works at the present time. However, a section of the A40 to the west of the A40/Usk Road roundabout has been identified as a Priority 1 area. This section is approximately 650 metres long from the roundabout to just past the over-bridge that carries the roadway leading to The Dell and Cefn Coch farm.”¹¹

13. The section of road described as a Priority 1 area by the Cabinet Secretary forms part of the A40 referred to by the petition, however it is considerably shorter and is not the section which concerns many of the local residents who provided views to the Committee.

14. The Noise Action Plan for Wales 2013-2018 itself simply referred to the A40 between Raglan and Abergavenny as a priority area, though it noted that “the timing of any resurfacing will be dependent on the budgets available to the Welsh Government for carrying out such work”.¹²

15. Following a request for clarification from the Committee, the Cabinet Secretary indicated that the work being considered for the Priority 1 area identified on the A40 would focus on noise reduction measures rather than resurfacing. In June 2017 he told the Committee that:

⁹ Letter from Minister for Economy and Transport to the Petitioner, 3 November 2014

¹⁰ Nick Ramsay AM to the Committee, 31 August 2016

¹¹ Cabinet Secretary for Economy and Infrastructure to the Chair, 16 August 2016

¹² Welsh Government, A Noise Action Plan for Wales 2013-2018

“Implementation is anticipated from 2018/19, depending on available funding and the relative priority of other schemes in the programme.”¹³

16. The Cabinet Secretary also referred to a new noise survey of the motorway and trunk road network due to be conducted, which would involve a review of the current priority list.

17. The petitioner and local residents have contended that noise mitigation proposals which do not involve resurfacing would be insufficient. They have stated that the A40 should be resurfaced as a priority, particularly in light of previous commitments made. Nick Ramsay AM told the Committee that:

“This latest proposal by the Welsh Government to erect a noise barrier alongside part of the A40 is not considered acceptable by my constituents as it will not offer protection from noise to all properties. Throughout their campaign my constituents have been fighting for modern tarmac to reduce the existing noisy concrete surface. As the concrete surface is nearing the end of its life its replacement will in any event be required before much longer.”¹⁴

18. David TC Davies, MP for Monmouth wrote to the Committee in March 2018 stating:

“While the Welsh Government seems to be favouring a limited form of noise barrier/fencing, this has been roundly rejected by all involved as being inappropriate and unlikely to resolve the whole problem. Any such barrier would be very weather dependent, as well as having to be extensive i.e. a mile or so in either direction of The Bryn on both sides of the carriageway, and similarly at Bryngwyn and other various points along the A40. It remains the strong opinion of these affected and long-suffering communities that the only way to alleviate A40 noise pollution is to resurface the entire highway.”¹⁵

19. In a letter to the Committee during May 2017, the petitioner wrote:

“The road noise has got progressively worse over the past year and affects all the communities alongside the A40, not just The Bryn. The only solution is for full resurfacing of the A40 from Raglan to

¹³ [Cabinet Secretary for Economy and Infrastructure to the Chair](#), 21 June 2017

¹⁴ [Nick Ramsay AM to the Committee](#), 31 August 2016

¹⁵ [David TC Davies MP to the Committee](#), 7 March 2018

Abergavenny. This has been an nine year campaign – we have been led to believe that resurfacing would take place.”¹⁶

SWTRA Study: Noise Action Priority Areas – Noise Mitigation Optimisation
June 2015

20. The Committee wrote again to the Cabinet Secretary for Economy and Transport on 18 October 2017 to ask for a further explanation of the reasons for the apparent change in position since the production of the Noise Action Plan, and previous commitments given by the Welsh Government that a resurfacing scheme was being designed.

21. The Cabinet Secretary stated that a study had been commissioned in June 2015 by the South Wales Trunk Road Agent (SWTRA) to review the 16 Priority areas identified by the Noise Action Plan in further detail. In relation to its findings, the Cabinet Secretary told the Committee:

“The concrete carriageway sections have still not deteriorated to a point where full renewal or replacement is necessary. There are also difficulties with regards to the A40 in that laying an asphalt surface layer on top of the concrete surface is not feasible, as it would potentially require the redesign and full replacement of a number of the existing assets, including the safety barriers and carriageway drainage. An additional surface layer would also reduce the headroom clearance at a number of the bridges that cross the A40.”¹⁷

22. Subsequently, the Committee requested and received a copy of the study from the Welsh Government. This showed that SWTRA had instructed WSP | Parsons Brinckerhoff to undertake noise assessments of Noise Action Plan Priority Areas (NAPPA) in the South of Wales. The purpose of the study was to optimise the noise mitigation options available on sites selected as part of the prioritisation process.

23.It states, in relation to all the sites studied:

“The sites assessed are all adjacent to concrete carriageways. Whilst a low noise surfacing inlay or overlay may prove to provide acceptable noise reduction, the existing condition of the concrete carriageways is questionable and so only a full reconstruction is deemed to provide a satisfactory long term solution. Due to the logistical challenges and

¹⁶ Petitioner to the Committee, 15 May 2017

¹⁷ Cabinet Secretary for Economy and Transport to the Chair, 13 February 2018

costs associated with reconstructing relatively short sections of carriageway, it was considered that noise barriers would provide a simpler and less disruptive solution in the shorter term. This is discussed further in the Cost/Benefit Analysis section below. Should a programme of concrete carriageway renewal be adopted by the Welsh Government, the current NAPPA sites would further benefit from the noise reducing properties of low noise surfacing. Therefore, this study focused mainly on the feasibility of noise barriers according to the topography of the site and the line of sight from the noise sensitive receptor to the road.”¹⁸

24. The study indicated that noise barriers would be a “simpler and less disruptive solution in the shorter term”. However, whilst it did not examine the condition of the road in any detail, the Committee notes its statement that “the existing condition of the concrete carriageways is questionable and that a full reconstruction would be the only satisfactory long term solution”.

25. The study concluded that noise barriers are potentially feasible on stretches of the A40 around Bryngwyn and Clytha (Raglan Roundabout).

26. Due to the report’s methodology a full cost-benefit comparison of low noise surfacing and noise barriers was not carried out in relation to the specific sites on the A40. However, the example site used for a comparison of the relative costs of these options indicates that resurfacing (including maintenance after a 10 year interval) would be between 2 and 3 times more expensive than installing noise barriers.

Noise and Soundscape Action Plan for Wales

27. On 11 July this year the Minister for Environment, Hannah Blythyn AM, announced the launch of a 12-week public consultation on a draft noise and soundscape action plan for Wales covering the period 2018-2023. This will replace the current Noise Action Plan for Wales. Her written statement stated:

“The Welsh Government will prioritise sites on the motorway and trunk road network for treatment, based on ranking the sites according to noise values, numbers of homes affected, complaints received in the five years to June 2018, proximity of network improvement works, cost and deliverability. We will develop a programme of works to treat the

¹⁸ SWTRA Study: Noise Action Priority Areas – Noise Mitigation Optimisation, June 2015

most pressing locations with mitigation measures such as noise barriers and low noise surfacing.”¹⁹

28. The statement advised that decisions over which locations will receive mitigation in the next five years will be taken by the Cabinet Secretary for Economy and Transport.

3. Conclusion

29. The 2015 SWTRA study appears to indicate that the high relative initial costs of low noise surfacing could have been the reason for the apparent change in position on behalf of the Welsh Government between late 2014 and summer 2016, when it moved from planning to resurface the concrete section of the A40 in Monmouthshire to developing plans to erect noise barriers instead.

30. The Cabinet Secretary has consistently stated that the existing surface of this stretch of road is not life expired, though the 2015 study indicates that the condition of the three concrete dual carriageways in Wales is questionable and that resurfacing represents the “only satisfactory long-term solution”.

OUR VIEW

The Committee recognises the need to prioritise works of this nature. We also acknowledge that the Welsh Government has consistently advised that any works will only be undertaken when budgets allow, even whilst indicating that schemes were in the design stage.

Nevertheless, it is clear that everyone involved recognises that the noise levels on this stretch of the A40, and the documented impact that road noise has on local residents, warrants mitigation works. It was the clear expectation of the petitioner, elected representatives and local residents that this work would comprise replacement or overlay of the existing carriageway with low noise surfacing. This was based on commitments made in the Noise Action Plan for Wales 2013-18 and correspondence from Ministers at that time.

The Committee has not received a definitive explanation as to why the intended approach to noise mitigation changed between commitments made by the then Minister for Economy and Transport in late 2014 and correspondence from the current Cabinet Secretary in August 2016. We note the Cabinet Secretary’s

¹⁹ [Written Statement by the Minister for Environment, Noise and soundscape action plan consultation](#), 11 July 2018

assertion that the current surface is not “life expired”. However, this must also have been the case at the time the current Noise Action Plan was produced in 2013.

It seems reasonable to conclude, therefore, that available budgets have not been sufficient to allow for a resurfacing scheme to be prioritised on this stretch of road. In these circumstances the design of a noise barriers as a “simpler and less disruptive solution in the shorter term” is not unreasonable. However, regrettably, no solution has yet been implemented at the time of writing, when the current Noise Action Plan is in the process of being replaced (and potentially reprioritised). We consider that this negates some of the justification for, and benefits of, pursuing a “shorter term” solution.

The recent public consultation on a draft noise and soundscape action plan covering the period 2018-2023 will have provided those affected with a further opportunity to provide their views directly to the Welsh Government.

However we acknowledge the frustration of the petitioners and local residents that, after more than 10 years of campaigning and despite previous undertakings by the Welsh Government, they are again in a position of having to respond to a consultation.

Recommendation 1. We consider that the case has been made for the need for mitigation works along the stretch of the A40 covered by the petition. The Welsh Government should implement measures to reduce the impact of noise on local communities as a priority. Given there will soon be a need to carry out a full resurfacing programme on this road, we believe that serious consideration should be given to scheduling the replacement of the existing concrete surface at the earliest opportunity.
