



Ein cyf/Our ref ATISN 13311

21 August 2019

Dear ,

**Request for Information – ATISN 13311**

I wrote to you on 26 July regarding your request for information. You asked:

1. What assessment has been made of the effects on NO2 emissions caused by the regular traffic problems which occur on the southbound carriageway of the A494 on the 2.5km stretch immediately north of the river Dee?
2. What measures are being considered to alleviate the traffic issues at the location noted above.
3. What data exists which could be used to assess the volume of traffic which uses that stretch of road (both directions) which has come from / is going towards locations on the Wirral peninsula and which might therefore benefit from a new road crossing at the mouth of the Dee estuary. Such data may include the use of ANPR at multiple locations to track the flow of traffic. This request is only concerned with traffic volumes, not raw ANPR data in such cases.
4. What the impact of reversing the speed limit reduction to 50mph on the stretch of the A494 north of the River Dee to the Deeside Park Interchange where it is a 3 lane all-purpose dual carriageway (D3AP) would be whilst retaining the emissions related speed limit reductions recently introduced elsewhere on the A494.
5. The geographical locations of the three PCM Links documented in the A494 Deeside Weltag Stage 3 report. Within this document, the speed limit reductions to



50mph are predicted only to have a positive compliance benefit at PCM Link 559 but not at PCM Link 30571 or PCM Link 30625.

6. The rationale behind reducing the speed limit to 50mph at locations related to PCM Link 30571 and PCM Link 30625 despite the A494 Deeside Weltag Stage 3 report (Table 8, Page 23) showing no positive impact (except historical) to expediting achievement of compliance will be achieved.
7. To confirm the following understanding:
  - 7.1. Due to implementing a speed limit reduction to 50mph at locations related to PCM Link 559, compliance at that location is expected to be achieved in 2020 instead of 2021.
  - 7.2. Compliance at locations related to PCM link 30571 will not be positively impacted by the implementation of a speed limit reduction to 50mph, since achievement is expected in 2021 in either case.
  - 7.3. Compliance at locations related to PCM Link 30625 have been compliant since 2018 regardless of whether a speed limit reduction to 50mph was implemented, but compliance would have occurred in 2017 had such a limit existed then.

I confirm we hold some information captured by your request which can be seen below.

1. The WeITAG appraisals included traffic and air quality modelling using information from various sources including diffusion tubes for air quality data and INRIX, Department for Transport and Trafficmaster for traffic flow data. The WeITAG Stage 3 report makes reference to the INRIX data indicating that along the studies section of A494, westbound journey times increase in the PM peak, with a 2 minute delay in journey time. However, as the intention of the studies was to reduce levels of NO2 along the whole route section, no specific modelling of the effects of this congestion on NO2 was undertaken
2. Outside of the work undertaken to reduce levels of nitrogen dioxide, the Welsh Government are also progressing a scheme to alleviate congestion along the A55/A494/A548 Flintshire corridor and have identified a preferred proposal to construct a new link between the Shotwick Interchange and Junction 33 of the A55. Further details on this scheme are available on the Welsh Government website at:  
<https://gov.wales/a55-a494-a548-flintshire-corridor>
3. Traffic modelling and monitoring has been undertaken separately as part of the A55/A494/A548 Flintshire corridor scheme and included a number of traffic surveys. A copy of the modelling report is attached. The preferred proposal to construct a link between Shotwick Interchange and Junction 33 of the A55 includes the existing A548 Flintshire Bridge crossing.
4. This work has not been undertaken, but may be undertaken at a later date depending on the results of the monitoring undertaken since the limit was first implemented in June 2018.

5. The Ordnance Survey grid references at the centre point of each of the PCM links identified by DEFRA as having exceedances are as follows:

PCM Link	X Coordinate	Y Coordinate	Location
30571	332760	368830	A548 Deeside Park Interchange to A548 Drome Corner Interchange
30625	333360	369850	A548 Drome Corner Interchange to A550 Queensferry Interchange
559	330000	366730	A550 Queensferry Interchange to B5125 St David's Interchange

The PCM model is based upon the data recorded by the Department for Transport at their count point sites, which record data between junctions, hence why each of the links are junction to junction and not at specific locations along the route. Further details on the count points including the start and finish junctions are available on the Department for Transport website at:

<https://roadtraffic.dft.gov.uk/>

6. Whilst the principal aim of this work was to accelerate compliance with the Directive and Regulations, the Welsh Government is committed to improving air quality and the decision was taken to retain the speed limit on those links where it may not necessarily bring the compliance date forward, as the measure still has the potential to reduce NO<sub>2</sub>. In addition, the baseline compliance dates, i.e. those without intervention are obtained from the PCM model, which as noted in the WelTAG appraisals and our supplemental plan is likely to have recorded lower levels of NO<sub>2</sub> in comparison with the data we have recorded at the roadside.

Turning to your final question, the Freedom of Information Act (FoI) provides a right to ask for recorded information held at the time a request is made. It does not require an authority such as the Welsh Government to provide views or opinions where those views are not already recorded. This is confirmed by the Information Commissioner's guidance 'The Guide to Freedom of Information', page 7:

*"The Act does not cover information that is in someone's head. If a member of the public asks for information, you only have to provide information you already have in recorded form. You do not have to create new information or find the answer to a question from staff who may happen to know it."*

On that basis, although you have submitted each of your questions as 'FOI requests', the Act does not oblige us to confirm your understanding except insofar as such information is held in recorded form at the time the request was made. In relation to questions 7.1, 7.2 and 7.3, I can confirm that no such information is held on record. That said, I can confirm the following:

- 7.1 Based upon the outcomes of the WelTAG Stage 3 appraisal, the continuation of the 50mph speed limit on PCM link 559 is **likely** to bring forward compliance to 2021.
- 7.2 Based upon the outcomes of the WelTAG Stage 3 appraisal, the continuation of the 50mph speed limit on PCM link 30571 will not bring forward compliance.
- 7.3 Whilst the PCM model suggests that link 30625 has been compliant since 2018, the indicative data recorded by the diffusion tubes at the roadside as detailed in Table 4 of the Stage 3 report and the Impacts assessment report indicate that NO2 levels are considerably higher than the limit value. As Welsh Ministers have a legal duty to comply with the Directive and Regulations, it was considered inappropriate to ignore the recorded data and take the 'do minimum' approach with link 30625 on the basis that it was considered compliant by the PCM model.

A full review of the NO2 data recorded at the roadside following completion of the Stage 3 appraisals is currently being undertaken and we will report on the findings in September. This may result in the speed limit being lifted on one or more of the PCM links or see development of the Precautionary Retained Measure, which in the case of the A494 is air quality barriers.

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at:

Information Rights Unit, Welsh Government, Cathays Park, Cardiff, CF10 3NQ  
or Email: [Freedom.ofinformation@gov.wales](mailto:Freedom.ofinformation@gov.wales). Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely