

P-04-556 No to Closing Junction 41 – Correspondence from the Petitioner to the Committee, 07.07.15

NO TO CLOSURE OF JUNCTION 41

To all members of the Petitions Committee,

I would like to make the committee aware that the Junction 41 Action Group against the closure remains very active in the town, maintaining public awareness of the implications of the closure and gathering anecdotal and statistical information about the actual daily effects of the closure.

The Action Group is undertaking its own evaluation of the Final Evaluation Report produced by S.W.T.R.A. and finds it flawed, ambiguous and misleading in many instances. A full response from the Action Group will be forwarded to the Minister shortly. I would urge the committee to consider some of the observations listed below before accepting the Report's findings.

With such short notice I am only able to give a flavour of our concerns with regard to the report.

The tone and content of the Report seems to be skewed to support the Key Objectives.

1. Reduced Average Journey Times: (Objective 2)

Significantly, this is the objective upon which the primary monetary evaluation is based. Unfortunately, the objective is rather vague. What percentage reduction would justify the closure? How many seconds saved would be considered significant? What are the parameters?

Press reports prior to the trial specify an 11% increase in traffic flow as a justification for the closure, (South Wales Evening Post , March 18th 2014) and yet traffic flow is no measured.

In the Executive Summary, average journey times between Junctions 38 and 42 are reported to have been reduced by up to 34 seconds (5 %). This highlighted statistic is hailed as meeting Objective 2. However, close analysis of the actual statistics (table 3.2) combining all the journeys reveal the average gain on westbound journeys during the junction closures of approx. only 12-13 seconds. (Indeed,

selective use of the statistics could be employed to argue that between 7 and 8 A.M. average journey times actually increase by 18seconds (4%).)

Either way, a saving of, on average, 12 seconds on an average 9.5 minute stretch of the Motorway is surely not sufficient to justify any closure.

2. OBJ 3 To reduce the Accident Rate between J 38& 42 during peak periods:

This is a complete red herring. The report includes this as an objective but is unable to provide any statistics. I would argue that accident statistics are freely available and that there are no reported accidents at Junction 41 westbound either before or during the trial period. To include this as an objective implies otherwise and is again misleading.

3. OBJ 1 Journey Time Reliability:

The Report does not make allowance for the introduction of the Average Speed Cameras , which have had a noticeable effect on traffic speeds, causing motorists to slow down quickly and then speed up gradually. The introduction of the cameras part way through the trial has skewed these results.

In addition, the report states that it is informed by data retrieved from Tom Tom navigation systems but does not give any indication of the number of vehicles tracked. How reliable are these statistics?

4.Secondary impacts:

Under the objectives of the report, it is stated that " the assessment of the supplementary impacts on the local areadoes not form part of the evaluation of the success or otherwise of the slip road closure in terms of its performance against the objectives.'

How can this report have any credibility if the effect on the local roads is not taken properly into consideration?

Local roads: The report states that "..overall, there is no evidence at present of the trial slip road closures adversely affecting the majority of the key routes through Port Talbot"

This is patent nonsense. All key local roads experienced increased congestion during the trial. The average time delay recorded on the Action Group survey was

15 minutes. Indeed if there wasn't any adverse impact on local roads, we wouldn't be fighting the closure! We can only assume the recording techniques were flawed.

Air Quality:

Diffusion tube no. 61 indicates that for the 3 months pre closure period the average concentration of Nitrogen Oxide (NO₂) was 31.2 . For the 7 months post closure, levels of 42.3 were recorded. (table 5.2). This reading clearly exceeds the government's long term quality objective. In relation to Carbon emissions, the report admits that its own statistics are based upon assumptions that the percentage of HGV' s remained constant. Assumptions should not form part of a report at this level.

5. I believe the Chamber of Trade will respond to the report findings in relation to shopping patterns etc. but, again, we feel that the report findings are based upon insufficient and inaccurate data.

In conclusion, I hope that we can persuade the committee to see that the closure of our junction would be devastating for our town for all the reasons put forward in my previous correspondence. The Final Evaluation Report adds insult to injury. We find it biased, flawed and inaccurate. It is narrow in its focus, dismissive of local problems and partisan in its findings.

The trumpeted economic benefits of £179,815 p.a. are spurious when based upon an average 12 second decrease in journey times. In any case, this figure falls far short of that expected by the WAG:

“Estimated wider economic benefit of time and accident savings on the M4 is expected to be over £1 million per year’ : Edwina Hart. (Reported in the South Wales Evening Post March 18th, 2014).

Members of the Action Group would be more than happy to discuss our findings with AM's. we would welcome an opportunity to dissect the Trial Evaluation Report and to discuss other alternatives to closure. We only ask to be consulted properly and for our opinions to be considered.

Thanks for listening today,

Faithfully, Rose David (petitioner)