ATNM Consultation – Response by Wheelrights

Context

Wheelrights campaigns to promote cycling in the general Swansea Bay area. Thank you for the opportunity to comment on the draft review of the ATNM and for the work that has clearly been done on the initial consultation and on reviewing and updating the previous map (34 routes added, 29 extended or modified and 37 removed).

This response focuses on cycling routes and is made in the context of the regulatory and social changes since the first ATNM was published in 2022.

- Urban areas now have a default 20mph speed limit with exceptions decided by local authorities.
- Changes to the Highway Code made in 2022 require drivers who are turning into or out of a side road to give priority to people walking or cycling straight ahead along the main road.
- Social safety is receiving increasing emphasis. (Would you be happy for your 14-year-old daughter to use that route alone? After dark?) Fewer women and girls than men and boys feel able to choose cycling for transport, because of perceptions of lack of safety (even though young men are reportedly more likely to be the victims of violence and the owners of expensive bikes of bike-jackings).
- There is growing evidence that transforming streets to provide cycle infrastructure to the highest design standards (a coherent network of safe, direct, comfortable and attractive routes) doesn't just increase the number of people who choose to travel actively but also benefits everyone who uses those streets. Although proposals to transform street layouts often attract noisy opposition the changes are usually valued once they have bedded in. Such neighbourhood transformations can attract funding from various sources.

1. Do you think the network of proposed (future) routes shown on the [draft] map will enable people to make more everyday journeys by walking, wheeling or cycling?

1.1 Rate of progress The map is not the network. We note that the ATA Guidance intends the map to be a tool for local authorities to develop a strategic plan of all the routes [1] to be created within a 15 year period [2]. The first map was published in 2022. Given the rate of progress to date Wheelrights does not understand the purpose of including so many future routes when there seems to be no realistic prospect of completing the network shown in the original timeframe, even with the necessary political farsightedness and courage.

1.2 Quality of routes Whether future routes will enable (or encourage) people to make more everyday journeys by active travel depends strongly on the quality of all the routes. Almost all Swansea's existing on-street cycling routes (i.e. those that are not ex-railways or through parks) have been created by redesignating footways as shared use. Few modifications have been made to junctions or street furniture. Shared use footways are disliked by users (walking or cycling) [3]. They are particularly difficult for those new to cycling or nervous about it, because of the need to manage interactions with pedestrians and the repeated need to slow right down at turnings and entrances, balance (or stop and restart), and scan in all directions for turning traffic. They're often cluttered with street furniture. They're equally unpleasant for pedestrians who can be startled when people on bikes (necessarily) weave round them.

In the planning of future routes attention needs to be given to this statement from the Active Travel Act Guidance, "*The cycle is a machine that can travel at* [*a*] *speed which makes it an ideal replacement for the motor car for many journeys, but it also means that it can be unsuitable for sharing provision with pedestrians*." [4]

Attention also needs to be given to the ATA Guidance before access controls (barriers / bollards) are installed, e.g. "*Access controls are often ineffective in addressing the issues they are intended to prevent. Restrictive access controls are inconvenient, can be unsightly and can actively discriminate against some user groups who have legitimate rights to use a path including disabled people and users of non-standard cycles*" [5]

1.3 Social safety Routes (existing or future) which do not meet the social safety test exclude many people, especially women and girls. Existing examples are the Clyne railway path SWA-EX 7.4, path on east bank of the Tawe SWA-EX 3.1, Gowerton to Gorseinon SWA-EX 5, N-S path through the east of the Enterprise Park SWA-EX 29, Singleton Park SWA-EX 7.4. The bridleways designated as Future Routes on the consultation ATNM all have this drawback (alongside the other problems of bringing such routes up to AT Guidance standard).

2. Are there any further changes to the map that would enable people to make more everyday journeys by walking, wheeling or cycling

2.1 Existing Routes Observations by Wheelrights members on some of the existing routes shown on the consultation ATNM are listed in Attachment 1.

2.2 Network design Wheelrights members hope this legally required ATNM update can be used as an opportunity for taking a strategic approach to the identification, labelling and prioritising of a future coherent network of routes that are safe, direct, comfortable and attractive. The ATA Guidance recommends the classification of cycle routes as primary, secondary or local, based on the kinds of connections they provide [6]. The local classified roads ('A' and 'B' roads) and other urban roads where the default 20mph limit has been increased are generally the most desirable, direct travel corridors (and have often also captured the least challenging gradients). They can form a first draft for a backbone of primary routes, to be prioritised for the provision of protected cycleways, with the greatest potential to be used for increasing numbers of everyday journeys.

The 20mph speed limit and the 2022 Highway Code changes were introduced to provide a safer environment for vulnerable users of streets in urban areas. Such areas of low speed motor traffic, especially residential ones, form the ATA's basic network [7]. Near their homes people choose their own routes to and from their front doors and designated routes become largely irrelevant. This suggests that attention should be given to Table 11.1 of the Active Travel Act Guidance [8] which shows that in streets with a 20mph speed limit and low traffic volumes no special provision is needed for most people to feel comfortable cycling.

2.3 Presumption against shared use Future cycling routes need to be shown as such on the map. All the future routes on the consultation map are shown as '*walking and cycling*' routes. While it is understood that a line on the map does not imply anything about the design of a potential route Wheelrights members urge the council to be ambitious about future '*cycling'* routes. Design work may later find that in fact the most appropriate option is to redesignate a footway as shared use for some or all of a route, but that option must never be the first or default approach.

2.4 Route numbering The draft map labels routes in bitesize segments. For example, a future route shown along the A4118 from Upper Killay to the city centre at Alexandra Road is labelled successively with the numbers (all preceded by SWA) 142, 75, 147, 247, 248, EX 9.4. The table in Attachment 2 shows the numbering for existing and future routes along other classified roads. This is unhelpful for clear thinking about where a 'route' goes, for auditing and for prioritising. For example, route SWA 247 on the A4118 runs between the junction at Parc Wern Road to that at Page Street

- How can an audit tool rate its directness meaningfully?
- How can a prioritisation tool rank the priority of a route fragment which neither begins nor ends at a significant trip generator or destination?

If you have any other feedback on the updated map, please write your comments below.

3.1 Routes to expedite Notwithstanding any other decisions about the ATNM Wheelrights urges decision-makers to expedite the three routes for which much preparatory work has already been done, so that the resources already applied will not have been wasted.
SWA 73 Across Clyne Common
SWA131 Gowerton to Penclawdd missing link
SWA147/247 Walter Road to Sketty

3.2 Future housing developments Provision must be made for direct connections between land earmarked for future housing developments and primary routes to employment, education, leisure, shopping and other destinations. New housing developments that claim to be cycle-friendly often have provision only within the development rather than by connecting it to the wider area.

3.3 Cycling and bus priority The main transport corridors that need to be primary cycle routes (see2.2) that are also the most useful bus routes. The needs of these two forms of car-free travel need to be co-ordinated (rather than prioritising one or the other).

3.4 Street design changes In areas with the default 20mph speed limit a sustained programme of changes is needed to street design so that drivers find it natural to use lower speeds and to give priority to people walking or cycling across side turns (e.g. reducing corner radii, narrowing entrances to side streets). Speed bumps should be a last resort to reduce motor traffic speeds and if used must follow design guidance for cycling. Funding sources other than for Active Travel are available for such neighbourhood improvements, e.g. *Safe Routes in Communities*.

3.5 One-way streets One-way streets are a disincentive to cycling. They make route finding more difficult, lengthen journeys and diverted routes often involve roads with heavy traffic and difficult right turns. They encourage pavement cycling. New one-way streets must never be created without making provision for cycling.

John Sayce
Wheelrights Chair

Attachments

1. Observations on Existing Routes shown on the consultation ATNM.
2. ATNM route numbers on classified roads

1 Active Travel Act Guidance July 2022 para 4.3.2
2 Active Travel Act Guidance July 2022 para 10.15.1
3 Active Travel Network Map (ATNM) Development Report Feb 2023 paras 4.6.13, 4.6.14, 4.9.2, 5.7.2
4 Active Travel Act Guidance July 2021 para 1.3.5
5 Active Travel Guidance July 2021 para 15.3.3
6 Active Travel Act Guidance July 2021 para10.4.28
7 Active Travel Act Guidance July 2022, paras 10.4.5, 10.4.6
8 Active Travel Act Guidance July 2021

Observations on Existing Routes

Note: All route numbers are prefaced by SWA-EX

Wheelrights is pleased to see that since the last consultation progress has been made on alterations that we have suggested, namely removal of barriers, erection of parapets on some bridges and better conformity with the Highway Code. There are still some unresolved issues as well as new issues that have arisen and need attention.

1. **Existing routes with non-compliant barriers**

WR Ref	ATNM route no.	Location	Observations
1	3.4	S end	Access from route segment 3.3 (both part of NCN43) hindered by rock too close to gate
2	3.6	At exit to New Cut Bridge	Barrier impossible for non-standard cycles and for most users of standard cycles. And on tight turn.
3	6.1	Western end	Too-tight chicane prevents comfortable turn into Dunvant Road. Alternative is to continue by cycling illegally on the footway or cross crash barrier to cycle on A4118
4	8.3	Furnace Way	Two impassable kissing gates on route between Furnace Way and Cwmfelin Way
5	8.4	Cave Street	Triple barriers impossible even for a standard cycle with skilled rider to pass. With compliant bollards yards away
6	9.7	S end of William St	Modal filter prevents access by cycles as well as motor vehicles
7	18.5	Subway under A4217	Boulder narrowing the path
8	30	At Castle Bingo	Chicane too narrow, prevents access/exit at cycle route
9	14.2	Ffordd Scott	Marked A.T. route with sets of barriers that are too close

2. Routes pre-dating current guidance

A number of routes which pre-date and do not meet recent guidance are convenient and need to remain in the portfolio of choices open to people cycling. It seems unlikely that it will be sensible to prioritise them for updating in the foreseeable future, if ever. Could they be identified in some way as secondary routes, and users alerted to their sub-standard quality?

WR Ref	ATNM route no.	Location	Observations
10	3.2b, 28.7	E side of Tawe, Stadium to Valley Way	Too narrow, poor sightlines, uneven surface, leaf debris, difficult dip under railway viaduct
11	18.4	E side of lake	Too narrow for two-way cycling or sharing
12	33a	Clydach canal towpath	Narrow path, partly on embankment with drops each side to canal and river, low bridges. Very narrow passageway to rear of Clos-y-Coedwr at southern end

3. **Local problems on Existing Routes**

WR Ref	ATNM route no.	Location	Observations
13	3.5a	At 90 deg turn to tow path	Bollard right in the mouth of the southern arm makes the turn difficult, non-standard cycle users have to dismount
14	1	Blackpill bridge	Bend at bridge too narrow for combined foot and cycle traffic
15	1	Last section to pier	Return from pier requires cycling through No Entry signs
16	3.6	New Cut bridge	Footways too narrow
17	3.2b	Brunel Way	Coming from the south on the east Tawe bank the mapped route (which is also NCN43) deviates east to a two-stage signalised crossing, then back west to another two-stage crossing to reach onward routes (3.2b, 3.3 or 10.3). Four motor-prioritised crossings plus a deviation is too much to ask. People use the too-narrow road bridge footway and the one-stage crossing west of the river.
18	4.2	Slip bridge area	Cluttered with posts for road signs, etc., very uncomfortable for people cycling and walking when busy.
19	13	Western end	For cycling eastbound (leave the main carriageway with fast traffic) the alignment of the dropped kerb and bollards requires turns that are too sharp

4. Mismatch between ATNM and what's on the ground

WR Ref	ATNM route no.	Location	Observations
20		Nantong Way	Northern section has '*Shared*' roundels on the footway till SWA-EX 20.2 joins, where they just stop. Consultation ATNM shows Future Route SWA113 (cycling and walking) on northern section, becoming just walking (SWA-EX 20.1) where 20.2 joins.
21	6.1 / 7.1	Top of Sketty Park Drive	At the traffic lights the map shows a gap between the northern end of 6.1 and the eastern end of 7.1. On the ground there are painted arrows directing people cycling north and west to cross Sketty Park Drive and Gower Road (with cycle lights) and use the (narrow, dog-leg) ramp to 7.1 on Sycamore Close
22		Glais	Non-existent path starting on Glais Rd. using a bridge over an existing AT route and ending by an underpass of A4067 near to the old Garth farm Nursery

ATNM – Classified Roads vs Existing/Future Cycling Routes

No claim made of completeness or total accuracy, but the table shows the fragmented nature of cycle route numbering on what are, to a first approximation, the most direct and convenient routes.

A Roads

Number	**To - From**	**ATNM route numbers** (all prefaced with SWA)
A4017	Mumbles Road	
A4067	Stadium to Pontardawe	
A4118	Gower to Dyfatty St	142 Upper Killay to Hen Parc Lane 75 - to ~ Olchfa 147 - to ~ Parc Wern 247 - to ~ Page Street 248 - to Fire Station EX9.4 - to Alexandra Road EX27 - to Carmarthen Road
A4216	Sketty Lane to Forestfach Cross	No route to top of Sketty Lane EX7.19 to Dillwyn Road 208 - to Vivian Road 33 - to Tycoch lights EX8.2 - to Broadway EX8.1 - to Gors Avenue No route to Glasfryn Close 134 - to Forestfach Cross
A4217	White Rock roundabout to A48	No route till Winch Wen EX 19 259 - to A48
A4240	Penllegaer to Loughor bridge	EX38 - to Gowerton/Pontarddulais route 4 - to Bwlch Road 130 - to B4620 9 - to Loughor bridge
A48	Pontarddulais to Neath	6 to Pontardulais outskirts No route to Pont Lliw 132 - to Afon Lliw 7 - to Gorseinon Common EX38 - to M4 junction EX11 - to Llangyfelach roundabout EX26 - to Long View Road 55 - to Llwyn-yr-Fer?? 61 - to Morriston Cross + //
A483	Carmarthen Road to M4	192 to Ysgubor Fach Street EX8.3 - to Gors Avenue 902 - to Forestfach Tesco 90 - leaves A road for Penllegaer
A484	Forestfach Tesco to Loughor	No route

B Roads

B4290	College Street to Mumbles Road	204 - to Kingsway EX9.5 - to St Helen's Road 24 - to Bryn-y-mor Road EX23.2 - to Mumbles Road
B4295	Cockett to Penclawdd	30 - to Swansea Road Waunarlwydd 152 - Gowerton EX4.1a - 131 EX13 - to Penclawdd
B4296	Killay-Gorseinon-Pondarddulais	75 - to Dunvant roundabout 151 - to NCN4 No route till Gowerton School 32 - to Hill Street 82 127 - to Gorseinon Cross 3 - to Grovesend
B4436	Derwen Fawr, Blackpill, Kilvrough	148 - To Rhyd y Defaid 40 - to Howells Reach No route till Mumbles Road EX24 - Mumbles Road to Curlew Close 73 - to Bishopston turning 80 - to Vennaway Lane No route to A4118
B4489	Llangyfelach Road	167 - to Eaton Road No route till Bryn Terrace 194 - to Cwm Level Road 28 - to Heol Gwyrosydd 129 - to Heol Gerrig 57 - to Heol Ddu 128 135 - to A48
B5493	Oystermouth to Caswell	37 - to Underhill Park 38 - to Caswell
B4603	Dyfatty to Clydach	No route to Maliphant Street EX 9.2 (walking only) - to Morfa 194 - to Siloh Road EX 3.9 - to Cwm Level Road 60 - to Martin Street 11 - to Morriston Cross 12 - to Llys Dur No route till Cwm Felin Fach Ex 30.1 - to M4 junction No route till 85 - to Ynystawe Park Road No route to Clydach
B4620	Forestfach Tesco, Kingsbridge, Loughor	246 - to Carmarthen Road 81 - to Kingsbridge 82 - to A4240 130
B5444	A4067 junction to	84 - to Jersey Road 67 - to Cwm Chapel Road EX29 - to A4217