

Appendix E

Feedback to Sustrans Consultation Response



Sustrans INM Consultation response

Sustrans believes facilitating and encouraging Active Travel as an alternative means to motorised transport for the purpose of making everyday journeys is key to building a healthier, more sustainable way of getting around in our everyday lives and changing the way we travel.

It's important because Wales is facing a number of serious challenges that active travel can help to address. Many of these challenges feature in the goals of the Well-being of Future Generations Act including: health; the environment; prosperity; equality and community cohesion.

Approach

Sustrans believes that the Integrated Network Map (INM) approach under the Active Travel Act (ATA) offers the opportunity to deliver safe, attractive places to live, where for short journeys and that routes for cycling are clear, coherent and connected.

The INM process represents an opportunity to change how streets, roads and urban spaces are designed and advocates an approach that places pedestrians and cyclists on an equal, if not preferential footing, to motorised modes. Delivery of the INM is an opportunity to identify where and how this can happen.

Sustrans strongly endorses optimising the approach to the INM development through defining key network aims at the outset, which will in turn determine how available data is used to identify trip generation and destination points and journey planning to generate desire lines. For example, prioritisation of routes to school will require different data sets and network considerations than a town centre or transport interchange.

Sustrans recognises that the delivery of schemes within the broad aim needs to fit with wider strategic priorities and consider appropriate resources for delivery within identified timescales. We are also aware that this is the first iteration of the authority's INM and that further routes and priorities can be established with later revisions and developments as part of the ongoing ATA process.

Common elements

Although each individual local authority's INM will vary with specific local considerations and priorities, there are elements which should form part of any

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effective INM approach such as:

- Setting overarching targets and Key Performance Indicators to achieve strategies and plans. Eg. An ambition to double the number of cycling trips from defined baseline and for 60% of journeys to be made by sustainable transport by 2026
- Developing a collaborative approach between local authority departments and with external agencies to mainstream delivery and promotion of infrastructure. This approach to active travel is essential to maximising the benefits from development and implementation of the INM. This should also include defining the ambitions for INM development in terms of achieving high standards under ATA design guidance as well as innovative approaches to solving problems and influencing future development.

In terms of infrastructure, key elements should include:

- **Routes reviewed and developed in line with the underlying principles** - Coherent, Direct, Safe, Attractive and Comfortable.
- **Continuous routes between key points** –continuous linkages between trip generation and destination points for identified routes. Broken routes defined by infrastructure type or pass/fail criteria are unlikely to be effective for a public-facing INM.
- **Existing Routes** – all upgraded to ATA Design Standards, including routes that 'Passed' pedestrian & cycle audit.
- **Time delays at signalised crossings** – need to minimise as a general approach. This is often cited as a key issue for pedestrians.
- **Comfort** – dropped (flush) kerbs, smooth surfaces. Generally good practice and in line with ATA Design guidance to ensure consistency.
- **Desire lines** – need to be catered for and linked to any local demand and evidence from consultation data. Redevelopment of signalised junctions should include all red phases to allow diagonal crossings for pedestrians, and ideally cyclists if possible.
- **Access controls** – reduce or remove wherever possible. Need to link provision to evidenced or known activity rather than general approach. Needs to be site specific solution and compliant with latest guidance.
- **Pavement parking and other route obstructions** – Obstruction of footways and existing Active Travel infrastructure is a significant problem and a strong deterrent to usage. Civil enforcement should consider opportunities to address persistent problems and councils should review procedures where other services may be impacting on infrastructure. Eg waste collection and obstruction by domestic bins.
- **Signing** – needs to be consistent and relevant to level of infrastructure. Eg Wayfinding strategy for local urban areas aimed at Pedestrians, Strategic direction signing for National Cycle Network and primary routes within urban areas. Statutory instructional signing should confirm to current ATA design standards and updated Transport Signs Regulations and General Directions (TSRGD) guidance, avoiding negative signing such as 'cyclists dismount' and 'route end'.

Active Journeys and Schools

Our **Active Journeys** programme is an initiative for schools who wish to see more of their pupils choosing an active and healthy journey to school.

Increasing the number of children who regularly walk, cycle or scoot to school has numerous benefits including:

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- increased physical activity levels resulting in improved health and wellbeing
- reduced congestion around schools
- improved relations with the local community
- improved academic performance and attendance rates
- increased road safety awareness
- increased confidence, self-esteem and independence for young people.

Generally we would expect a 20mph zone to be established in a wide area around all schools, with parking restrictions and good walking and cycling facilities included.

Flintshire County Council's INM Consultation 2017

Overall a good network development plan has been prepared by Flintshire CC and this should be acknowledged.

The main area or facility that is missing is the connection of routes through central areas of the main towns and communities. Whilst we understand that reducing capacity for motor vehicles can be a local issue, developing networks that reach all the key destinations is vital if the ambitions of the Active Travel Act are to be realized.

Whilst any new routes should be designed and constructed to the current Active Travel Act Design Guidance, it is also important that any existing routes are upgraded to the same standard and there are no details on how existing routes are to be improved. The key elements highlighted on Page 2 of this response should be considered in detail and picked up for improvements following the audit process of the Existing Routes.

It is impressive to see so many schemes included under the Short timescale (under 2 years), but we would ask if this is realistic considering lead in times for planning, design & consents and the availability of delivery funding?

In terms of any routes or links that we believe are missing then please see the table below. This list does include some links between settlements which we believe are vital to improve usage of active modes and provide a full network.

FCC Response:

All comments made in Approach, Common Elements and Active Journeys and Schools are duly noted. With regard to comments received on Flintshire County Council's INM Consultation 2017 the response is as follows:

Paragraph 2 - it is agreed that network development should include links to all key destinations, where it is possible to do so. Any proposal to reduce capacity for motor vehicles would need site specific traffic studies and trials together with full engagement with Members/ Town and Community Councils and the public. If you would like to put forward any particular sites, these can be looked at before the submission of the next INM in 2020.

Paragraph 3 - Comments are acknowledged. All of our Existing Routes have been re-audited and are held in the form of a schedule of improvements to be carried out through our maintenance programme and/or other funding sources that become available.

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The INM schedule has been reviewed in light of your comment and it is agreed the number of schemes falling within the short term timescale is unrealistic. Therefore, the following changes have been made:

Routes moved from Short Term to Medium Term:

Broughton - BR 4/1, BR 4 /2

Buckley - BU 5/1, BU 5/2, BU 6/1, BU 6/2, BU 6/3, BU 7/1, BU7/2, BU 8, BU 9, BU 11

Flint - FL 1/1, FL 1 /2, FL1/3, FL 3/1, FL 3/2, FL 3/3, FL 3/ 4, FL 6/1, FL 6/2

Holywell - HO 3

Mold - MO 6/3, MO 6/5, MO 6/8, MO 9, MO 10

Saltney - SA 2/1, SA 2/2, SA 2/3, SA 22, SA 23

Sandycroft – SAN 16, SAN 17, SAN 18, SAN 23, SAN 24, SAN 25/ 1, SAN 25/ 2, SAN 26

Queensferry – QU 13/1, QU 13/2

Routes moved from Medium Term into Short Term due to locality of schools:

Flint - FL 8, FL 9, FL 7/1, FL 7/2

Local route improvements and schemes that Sustrans believes should be included within the INM are:

Designated Settlement Name	Scheme	Key Destinations	Notes	FCC Response
Bagillt	BA 2/1	School	Extend improvements along A5026 to Riverbank and Sunnyside Close.	The route proposal has been extended into Holywell as a result of a request at the Consultation Drop In Event at Holywell.
Buckley	Central area & A549	Retail/ schools/ employment	Include cycle links on or near this direct alignment	Added a cycling route through Town Centre connecting BU 7/1 to BU 11 and BU 10/2 & 3. The A549 forms part of the principle network connecting Buckley with adjacent settlements. The AADF of Traffic is in excess of 15000, therefore cycle tracks would need to be provided. In this instance it is not possible to provide such due to land and road width constraints.

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Designated Settlement Name	Scheme	Key Destinations	Notes	FCC Response
Buckley	BU 6/2	-	Do not include A-frame at such an early design stage	The schedule has been amended to remove reference to A Frame and include removal of existing kissing gate. Exact provision can be resolved at detailed design stage.
Flint	FL 5/1 & 5/2	-	Schemes as highlighted are not part of the Croes Atti housing development, though there is benefit in these new routes.	Consulted with Planning and the proposal on the INM is not possible due to the road design layout having detailed planning permission. The INM and schedule have been amended to include Flag directional signage along through roads into Prince of Wales Avenue and Englefield Avenue.
Flint	Prince of Wales Av/ Englefield Drive	Retail/ schools/ employment	Upgrading of existing footpath to shared use would provide a direct link between residential areas.	Agreed and added to INM and schedule.
Flint	FL 6/1 & 6/2	-	Provision of unsegregated contraflow is noted, but we are concerned it is not the correct facility for a fairly busy road and a fully segregated cycle lane should be considered.	Agreed. The schedule has been amended to ensure at detailed design stage the first option should be a segregated contraflow cycle lane.

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Designated Settlement Name	Scheme	Key Destinations	Notes	FCC Response
Flint	FL 11	-	Potential to also use adjacent road (Trelawny Avenue) as part of a wider 20mph zone – shared use paths on A548 could connect school and residential areas to Dee Cottages link below.	Agreed. The INM and schedule have been amended to include these connections.
Flint	A548/Dee Cottages	Schools/employment	New crossing on A548 (near Trelawny Avenue) and contraflow cycle facility on rail bridge to Dee Cottages & NCN5/employment area.	Agreed. The INM and schedule have been amended to include these connections.
Flint	Access to Flint Station	Retail/employment/station	Improved walking and cycling connections to Flint Station – connecting existing and proposed routes.	Extended FL 6/2 to Castle Dyke Street and Train Station Car Park. Need to investigate improved crossing point and cycling provision for the short section on the A548.
Flint	Allt Goch	Retail/ schools/employment	Amend Allt Goch to one-way traffic flow plus contraflow cycle facility to provide direct access to town centre and connect FL6 & 8.	This was considered on initial network development. Restricted road width (3m at point point) and steep gradient make this road unsuitable for a cycle route. FL 7/2 is a suitable alternative.
Flint	Swinchard Brook (Cornist	Retail/ schools/employment	Upgrade footpath alongside brook to provide direct access.	Agreed. The INM and schedule have been amended to include these connections.

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Designated Settlement Name	Scheme	Key Destinations	Notes	FCC Response
Flint	Starkey Lane / Northop	Schools/ employment	Concern over new residential access road and connections to Coed Onn Rd & Starkey Lane as this could lead to 'rat-running'. Potential to limit access to active modes only.	The outline planning consent for this development was granted by committee back in 2004. This obviously predated the introduction of the legislation in Active Travel. The TA accompanying the application would have assessed vehicular access to the site via three points. If one or more of these access points were limited to pedestrian and cycle access only this may have resulted in a capacity issues and may have resulted in a recommendation of refusal of the application.
Holywell	Central area	Retail/ schools/ employment/ hospital	20mph/shared space facility in central area to connect proposed routes.	This can be investigated for the next submission of the INM in 2020.
Holywell	Pen y Maes / Strand	Schools/ employment	Connect residential areas & schools via link within school site.	Added to INM and Schedule. Precise route not defined. Feasibility required to determine route options.
Hope	Caergwle Station	Station/ employment	Provide cycle route to station – via Derby Road / Castle St.	This can be investigated for the next submission of the INM in 2020.
Mold	Central area	Retail/ schools/ employment	20mph/shared space facility in central area to connect proposed routes.	This can be investigated for the next submission of the INM in 2020.
Mold	MO4 / MO11	Retail/ schools/ employment	Connect routes via Wrexham Rd to provide direct links.	This can be investigated for the next submission of the INM in 2020.

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Designated Settlement Name	Scheme	Key Destinations	Notes	FCC Response
Mold	Rhydymwyn Link	Retail/ schools/ employment	Community desire to link to Mold (Long term option)	This can be investigated for the next submission of the INM in 2020.
Mold	A541/St Davids Lane	Retail/ schools/ employment	Improve links and crossing (A541) to provide direct access from residential area towards schools/town centre.	Agreed. The INM and schedule have been amended to include these connections.
Mold	Clayton Rd/ Ruthin Rd/ Bryn Coch Lane	Schools/ employment/ leisure centre	Develop improved walking & new cycle route along this alignment to connect destinations. Include improved crossing facility on New Street / Ruthin Rd.	New crossing on Ruthin Rd/ New Street is proposed as part of MO 6/5. Further investigation required to link Parc Hendy area to schools.
Penyffordd	PE 1/3	Schools	Extend link along Corwen Rd to Hawarden Rd, including link to Abbots Lane school	Extended PE ½ to Corwen Road on INM.
DEZ/WYG study Hawarden/ Saltney	BR 19	-	One-way hybrid cycle track – 3 different types of facility within short distance, recommend a consistent approach	BR 19, 20 & 21 covers 5.5 km approximately. The study looked at maintaining consistent design principles for ease of use. Constraints dictated type of facility to be provided. Sustrans have now been provided with the preliminary design plans.

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Designated Settlement Name	Scheme	Key Destinations	Notes	FCC Response
DEZ/WYG study Hawarden/Saltney	BR 20	-	Two-way cycle track – 3 different types of facility within short distance, recommend a consistent approach	BR 19, 20 & 21 covers 5.5 km approximately. The study looked at maintaining consistent design principles for ease of use. Constraints dictated type of facility to be provided. Sustrans have now been provided with the preliminary design plans.
DEZ/WYG study Hawarden/Saltney	BR 21	-	Shared use path – 3 different types of facility within short distance, recommend a consistent approach	BR 19, 20 & 21 covers 5.5 km approximately. The study looked at maintaining consistent design principles for ease of use. Constraints dictated type of facility. Sustrans have now been provided with the preliminary design plans.
DEZ/WYG study Connah's Quay	CQ 2/3/5 & CQ 2/6/1	-	Extend routes to High Street area to connect to key destinations	CQ 2/3/5 Gradient Constraints. CQ 2/6/1 Route to Health Centre Car Park with proposed safe cycle storage. High Street is a short stroll from cycle parking provision.
DEZ/WYG study Shotton	SH 2/7/5	-	Extend routes to High Street area to connect to key destinations	Extended on INM.
DEZ/WYG study Mancot	MA 2/13 & MA 2/15	-	Extend routes to Hawarden central area to connect key destinations	This was looked at as part of proposals for this area but constraints, speeds and traffic flows proved difficult to find a solution. This can be revisited for the next submission of the INM in 2020.

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Designated Settlement Name	Scheme	Key Destinations	Notes	FCC Response
DEZ/WYG study Mancot	MA 2/14	-	Additional link along A550 to A494 roundabout to connect to existing overbridges and network	Agreed. The INM and schedule have been amended to include these connections.
DEZ/WYG study DIP	DIP1	-	No details in schedule	Added details to schedule.
DEZ/WYG study DIP	DIP6	-	No details on mapping	Added route to INM.
DEZ/WYG study SAN	SAN26	-	Consider shared use path or addition of segregated footpath as walking route is popular	This does include a segregated footpath. Design Standard. DEO32.
Connecting Settlements - Flint	F3	Flint/ Connah's Quay	More detail on this route should be included within the INM. Some existing sections need upgrading and a preferred alignment is available. Additional details should assist in drawing down suitable funding at the appropriate time	Amended INM and schedule to include a proposed route alignment in accordance with Sustrans ongoing Feasibility study. Please note routes shown on Connecting Settlements Consultation Map have now been added to the Active Travel Mapper for submission to Welsh Government.

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Connecting Settlements	F4	Mold to Flint	No facility exists between Sychdyn and Northop at present. Additional details on potential routes could be provided on the Flintshire Central and Flintshire Central East consultation maps, supported by further information in the Connecting Settlements document	<p>Schedule amended to reflect there is no route from Sychdyn to Northop. Feasibility is required to fully examine route options for non-compliant sections and missing gap at Northop and Northop Interchange.</p> <p>Please note routes shown on Connecting Settlements Consultation Map have now been added to the Active Travel Mapper for submission to Welsh Government.</p>
Connecting Settlements	F5	Mold to Northop Hall	This connection could be reduced to Northop – Northop Hall as location of A55 will prevent a direct alignment	<p>This will be identified in future feasibility work. The Map does not contain precise detail or alignment of route. It is to show there is a need to connect settlements. As the F4 proposal is connecting Mold to Northop it may well be that this proposal will link to Northop Hall via Northop if no other direct route can be achieved.</p> <p>Please note routes shown on Connecting Settlements Consultation Map have now been added to the Active Travel Mapper for submission to Welsh Government.</p>

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Designated Settlement Name	Scheme	Key Destinations	Notes	FCC Response
Connecting Settlements	F6	Buckley to Ewloe	Buckley to Ewloe is picked up within the Designated Settlements details (various BU, HA & EW references)	<p>Amended. This should read Mold via Buckley to Ewloe.</p> <p>Please note routes shown on Connecting Settlements Consultation Map have now been added to the Active Travel Mapper for submission to Welsh Government.</p>
Connecting Settlements	F6A	Mold to Buckley	A direct AT route between Mold and Buckley should be included. We accept this is at an early stage but this link to the Buckley to Ewloe proposals (and on to Deeside) could provide a full connection. (F6 & F7 seem to miss the direct alignment)	<p>The Map does not contain precise detail or alignment of route. It shows a need to connect settlements. Future feasibility work will identify the detail. See comment above regarding amendment to Schedule to Mold to Ewloe via Buckley.</p> <p>Please note routes shown on Connecting Settlements Consultation Map have now been added to the Active Travel Mapper for submission to Welsh Government.</p>