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15th March 2022

Dear Mr Morris,

Re: Planning Application Number: P2021/1193

Thank you for inviting Sustrans Cymru to comment on this application. We have the following observations.

We are of the view that the transport links outlined in the application are not compliant with the Wales Transport Strategy, as sustainable transport mode hierarchy is not followed, prioritising walking and cycling infrastructure to minimise increased private car use.

Specifically, there is a lack of segregated walking and cycling routes on the minor roads within the development which means cyclists and pedestrians will not be separated from motor traffic. The Active Travel Act Design Guidance sets out a clear basis of when separation is required and, as this is a new development, segregated cycle and pedestrian routes should be provided throughout.

Within the development, walking routes are not direct and follow road alignments which are longer due to gradients. The development could be improved with additional pedestrian routes and cut through access, allowing more direct travel.

The application is also not compliant with the Well Being of Future Generations Act based on the above points.

There is a noticeable lack of wider active travel connections to settlements in Skewen, Neath, Port Talbot and Swansea.

The map showing the existing active travel routes is misleading. It indicates there is a cycle route at M4 Junction 43 but the cycle provision does not meet the Active Travel Act Design standards and is unsafe. The development needs to provide improved sustainable transport links. There are plans by Welsh Government to improved M4 junctions in the area and these should be taken into account when considering this application.

Traffic volumes are more likely to increase in the Junction 43 area because of the development and the future improvements in the A465, so timing of the traffic lights on this roundabout is very sensitive to change. Welsh Government's Trunk Road agent have confirmed that, because of the short time between changes in the existing light sequence, it is almost impossible for pedestrians and cyclists to safely cross at this point <https://goo.gl/maps/tTgZFFKEUqyMKejCA>. Therefore, this crossing point is dangerous and unacceptable in its present state.

A solution needs to be found prior to the development going ahead and the solution needs to be in place prior to any new build (AT infrastructure must be in place prior to the development being built under PPW11 guidance)

We are of the view that there are potentially 3 solutions.

1. Provide a suitable light controlled crossing at this point. This has implications for congestion, however any development should not be increasing the flow (capacity) of the road at the expense of Active Travel and certainly not at the expense of safety.
2. Provide a direct and easy to use grade separated route at this crossing point, potentially passing under the slip road.
3. Look for potential alternative routes, probably to the south, but these should not be at the expense of providing a safe direct route.

There is no connectivity to Fford Amazon along the alignment which was previously designated as a road. Without this key route residents will have limited options to travel sustainably to Swansea and access employment sites to the south of the development. Even if the southern access road is not developed, there must be provision for active travel along this corridor to link into Fford Amazon and National cycle Network route 4 along Jersey Marine.

There is an opportunity to develop a traffic-free route along the line of the Tennant canal which has been explored previously, linking into an existing path near Ashlands on the western edge of Swansea. This would provide an attractive and direct link into Swansea from the development and should be considered as part of any planning gain.

I would be grateful if the above points can be reviewed as part of any consideration of the application going forward.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ryland C. Jones', with a long horizontal flourish extending to the right.

Ryland C. Jones
Head of Connected Communities
Sustrans Cymru