



Order Branch
Transport
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

4th May 2021

Dear Sir or Madam,

Proposed improvements to the A55 at Junctions 16 and 16A

We are writing as Local Representatives of Cycling UK to make a **representation** in respect of your recently published Environmental Statement and Draft Orders.

Cycling UK promotes cycling in the UK and has circa 70,000 members. Its objectives, registered with the Charity Commission, are to:

- a) Promote community participation in healthy recreation by promoting the amateur sport of cycling, cycle touring and associated amateur sports;
- b) Preserve and protect the health and safety of the public by encouraging and facilitating cycling and the safety of cyclists;
- c) Advance education by any means Cycling UK's trustees think fit including the provision of cycle training, and educational activities related to cycling; and
- d) Promote the conservation and protection of the environment.

We recognise and commend the efforts that have been made by your project team to engage with us in the preparation of the current proposals. We note and appreciate your intention to improve and enhance NCNR5 (as required by Section 9 of the Active Travel (Wales) Act 2013) as part of these improvement works. Also, your intention to provide shared use paths along the local roads which will run parallel with the A55 and across the A55 overbridges at The Puffin Cafe and at junction 16A. We believe the users of shared use paths alongside district distributor roads should have priority at junctions with side roads and private means of access, in accordance with the Welsh Government's Active Travel Guidance.

NCNR5 is regularly used by walkers and cyclists for both utility and recreational trips. It provides an essential route for walkers and cyclists along the North Wales Coast. There is no convenient alternative route. We feel it is important to note that Section 9 of the Active Travel (Wales) Act 2013 requires Welsh Ministers and each local authority, in so far as it is practicable, to take reasonable steps to enhance the provision for walkers and cyclists when exercising their powers under the Highways Act 1980 (note this is a wider category of users than the narrowly-defined 'active travellers' referred to elsewhere in the Act).

We should be grateful if you would please confirm that you intend to improve/enhance NCNR5 where it runs parallel to the A55 dual carriageway between the bridge over the railway to the west of J16 and Penmaenbach to the east of J16A. We have discussed the need for these minor improvements with your project team but note, with some concern, that

there is no reference to this element of the works in the Statement of Reasons which relates to the draft Orders for the proposed improvements at J16 and 16A.

We are aware that difficulties have arisen on other road improvement schemes with substandard infrastructure for cyclists having been provided and/or proposed to be provided. These substandard features have generally related to inadequate path width, excessive gradients and/or clearances adjacent to carriageways and/or vertical features. The Design Manual for Roads and Bridges requires compliance with standard details (Design Elements) set out in the Welsh Government's Active Travel Design Guidance. Where these standard details cannot reasonably be complied with, relaxations and/ or departures from standard may be authorised. There is a prescribed procedure; PAG 115/20 refers.

We recognise that the built environment and topography in this area are challenging and that departures from standard may be needed in order to thread a nominal three metre wide, two-way, shared use path between the A55 dual carriageway and the main North Wales Coast railway line but would expect to be consulted and engaged during the detailed design process and throughout construction in order to ensure that adequate facilities are provided and maintained for the benefit of cyclists at all times.

We should be grateful if you would kindly acknowledge receipt of this representation.

Yours sincerely,

Cycle Advocacy Network, Cycling UK