



Derby Cycling Group,
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Date: 4th November, 2019.

Your Ref: **A38 Junctions Interested Party Written Representation from Derby Cycling Group**

Dear Planning Inspectorate,

1. In October 2019, Derby Cycling Group submitted a statement regarding its analysis of the A38 Derby Junctions project (“the project”), including:
 - Our aspirations for the enhancement of active travel and of the non motorised user (NMU) experience following the delivery of the project.
 - A summary of the opportunities we could see were created for active travel by the project, which the project itself could, and in our view should, deliver.
 - Our previous representation to Highways England and their consultants (“the project team”) regarding the deliverables we would like to see from the project for active travel and non motorised users
 - A high level indication of the areas of concern we had regarding the project.
2. We are now submitting our review of the project at this point in time, as a written representation for Deadline 1 of the infrastructure planning examination timetable. It includes Derby Cycling Group’s detailed itemisation of the issues we are raising in relation to the project and their current status following conversations previously held with the project team. It also includes issues with congestion mitigation which we have not previously raised, but have lately become a significant and serious element to our concerns.
3. **Overall we object to the project because of several aspects where we still have significant concerns as defined below.**
4. **Project Deliverables:**
 - 4.1. In **Appendix 1** we have provided a check list of items where we have raised objections, comments or suggestions regarding the design of the NMU elements of the project. Most of these points have been raised previously with the project team although a few have been updated in the light of more recent changes to the scheme or to feedback from the project team. You will see that there has been previous discussion about these matters and some issues have been mitigated to a greater or lesser degree, however many areas remain to be resolved to our satisfaction.
 - 4.2. We would like to ensure that we can continue to discuss these matters with the project team.
 - 4.3. We are concerned that some items are just outside of the project area and therefore need the liaison of Derby City Council and Derbyshire County Council with ourselves and the project team to ensure that the benefits for NMUs and active travel are not hindered by poor infrastructure in the vicinity of the project area, and that opportunities raised by routes delivered by the project are utilised by the local authorities.
 - 4.4. We are not aware of any significant liaison in this respect by the aforementioned parties, and certainly Derby Cycling Group has not been invited to contribute our ideas to any such group.

5. Congestion Mitigation for NMUs During Construction Phase:

- 5.1. There needs to be a plan to coordinate congestion mitigation measures prior to the commencement of the construction phase of the project, especially with regards to the provision of additional cycling and walking infrastructure, to enable more people to choose to use active travel in order to avoid driving on the congested local roads.
- 5.2. The plan needs to consider how to mitigate actual levels of traffic in Derby City and surrounding County roads, but also, critically, how to create better cycling and walking routes so that local people can cycle or walk more, to avoid the congestion that does occur.
- 5.3. Construction of the A38 Grade Separated junctions will inevitably cause congestion during construction. Many residents in Derby are concerned that traffic will deflect off the A38 and queue up on local streets.
- 5.4. Issues this will cause include:
 - Degradation of air quality caused by motor vehicle pollution
 - Risks to health of residents living in congested streets
 - Delays and extended travel times on the road
 - Economic impact of delayed employee arrival for work, delivery of goods, customer satisfaction etc
- 5.5. There is also, however, an enormous opportunity to enable travel behaviour change:
 - If people who do not want to wait in queues use alternative forms of transport for local journeys
 - Particularly with Active Travel (walking and cycling)
- 5.6. Congestion its self will deter some walking and especially cycling. Investment is therefore needed in active travel infrastructure BEFORE construction starts. It is essential to:
 - Provide alternatives to driving
 - Promote those alternatives with publicity and public events
 - Make people think about walking and cycling
- 5.7. As an example of our concern; Royal Derby Hospital is located less than a mile from the A38 Junctions project site. It employs over 10,000 people with thousands more daily visitors attending appointments or visiting patients at the hospital, and many emergency and non-emergency ambulances accessing the site throughout the day. Increased congestion in the Kingsway/Utttoxeter New Road area is inevitable for several years while the project is under construction and will have a significant impact on the hospital. Derby Cycling Group already regards the routes around Royal Derby Hospital as needing significant investment in cycling infrastructure because there is already a suppressed demand there for cycling to work.
- 5.8. **Appendix 2 lists some potential interventions which would enable more cycle journeys in the vicinity of the A38 Junctions scheme, but which need to be implemented before the construction phase of the project begins.**
- 5.9. Derby Cycling Group is a member of the Derby City Council Active Travel Forum. At the last meeting on 15th October 2019 we became aware that other stakeholder members would like to take part in the conversation around congestion mitigation, but currently have no means to do so. We would like the Derby Active Travel Forum members to have the opportunity to contribute their concerns about congestion during the construction phase and other issues to the planning inspectors.
- 5.10. We suggest meetings involving Highways England, their consultants, Derby City Council, Derbyshire County Council and active travel stakeholders including Derby Cycling Group, Sustrans and others from the Active Travel Forum, to be arranged to enable wide ranging input to a congestion mitigation plan.

6. Cyclist and Pedestrian Safety from Construction Vehicles

- 6.1. There needs to be a clear plan to define how cyclists and pedestrians will be protected from

lorry danger caused by the large number of construction vehicles working on and delivering to the construction site. The plan could consider interventions such as:

- Cyclist and pedestrian detection and protection devices and features fitted to vehicles
- Trixy mirrors at site entrances and where access roads cross pedestrian and cycle paths
- Manning/signalisation of crossings where pedestrian and cycle paths cross access roads

6.2. We are not aware of any such plan, but believe this is essential to set the standards for NMU safety while construction is in progress.

7. Continuity of NMU Routes During Construction Phase

7.1. There needs to be a plan for keeping open all existing NMU routes which run through or near the project site. We are not aware of any such plan. The plan could include:

- A requirement that all routes are **fully accessible to all users at all times**.
- A plan of diversionary routes and the construction and accessibility standards to which they will be built and maintained, which will be used when the existing NMU routes have to be temporarily closed due to construction work.

7.2. In previous Highways England projects in Derby we have had variable levels of continuity of routes. The Raynesway Park Junction scheme (2010) was a tremendously good experience with positive intervention to even keep routes open during a flooding event; earlier works at Little Eaton roundabout (2014) were poor with the diversion utilising a steep set of steps which rendered the route impassable for people with mobility issues and for cyclists who did not have the strength to push their bike up the steep ramp provided, or restrain their bike on the steep decent (older riders, many women, children, and others).

7.3. All existing routes must remain open at all times because many people depend on them to get to work or other destinations and appointments. For example many people in Allestree walk or cycle on the Queensway and Kingsway routes to get to work at Royal Derby Hospital; many employees living in Little Eaton, Duffield and beyond, cycle along the A61 cycle path (NCN54), crossing the A38, to get to work at Rolls-Royce and other city locations. If these people cannot cycle, many will drive, adding to the already enhanced congestion due to the construction works themselves.

7.4. All routes must be totally accessible to all who currently use them.

8. We hope that these objections and other comments can receive the kind attention of the planning inspection team. Derby Cycling Group is always willing to participate in a positive and constructive manner in further conversations or meetings on any of the matters we have raised above.

9. Please note that the above points only constitute Derby Cycling Group's current comments regarding the scheme and we reserve the right to expand, amend or add to these in due course or as more details become available.

Thank you very much for your kind attention.

Yours faithfully,

Tony Roelich
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Derby Cycling Group

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Derby Cycling Group is a member based organisation representing over 400 cyclists in Derby and the surrounding area which promotes cycling as a healthy, sustainable and cost effective means of everyday transport.

Appendix 1: Derby Cycling Group NMU Checklist

A38 Junctions: Active Travel Network Checklist		
Submitted by Derby Cycling Group, November, 2019		
Criteria	Status (RAG)*	Comments
1. General Principles		
Retention of existing cycle routes alongside A38 junctions	Green	
Retention of existing cycle crossings over A38 and at A38 junctions	Green	
Existing cycle routes must remain open at all times during the construction of the new road configuration. There are no alternatives to many of these routes, lengthy diversions may be OK for cars but not when walking and cycling.	Green	The project team say they will remain open "where possible" and "alternative routing will be provided and clear signage" will be provided where routes are temporarily closed. Accessibility has not been discussed so far. It is essential to maintain the levels of cycling while the works continue. Raynesway Park Junction was a good experience for continuity of service and we'd like to see that emulated with A38 Junctions. The earlier works at Little Eaton were a poor experience.
Improvements to NMU routes to enable more car-free journeys	Orange	No commitment to segregation
Develop more continuous, direct, cycle routes alongside and crossing A38 junctions	Orange	No commitment to the most direct line, although some route improvements have been made.
Single stage crossings for NMUs (no central refuges) which respond quickly to the button being pressed by pedestrians and cyclists to reduce unnecessary delays to motor traffic.	Red	Multi-stage crossings are planned
Corners and bends in cycle paths should be built with the appropriate radius and avoid sharp angles	Orange	Need details of the design standards which will be used. Consider a bicycle standard vehicle concept: solo cycle; tandem; trike; bicycle with trailer bike (single wheel); bicycle with two-wheeled trailer; bicycle with panniers/child seat.
Good space to be provided on cycle paths and especially where pedestrians and cycles share the same space.	Orange	As above. Infinity Park Way is a good example where plenty of space is provided at pinchpoints (esp. crossings & junctions)
Temperature and humidity controlled crossings to be employed to give quicker response to pedestrians and cyclists wishing to cross in cold and wet weather.	Red	

	Contractors vehicles to be required to be fitted with at least a standard set of equipment to mitigate against collisions with cyclists (eg: Crossrail requirements). Routing of construction traffic to avoid local roads and features such as Trixy mirrors to be employed at appropriate access points to the construction sites where cyclists may be nearby.		http://www.crossrail.co.uk/news/articles/crossrail-implements-lorry-requirements-to-improve-cycle-safety
2. Kingsway/A5111 Junction			
	Retention of the cycle path along the eastern side of Kingsway		
	Upgrade the path along eastern side of Kingsway from Markeaton Island to Brackensdale Avenue, creating an off-road, segregated path. The existing, "bitty" route can be simplified due to the closure of the Raleigh Street access onto the A38, by retaining the path alongside the A38 carriageway with access spurs to Windmill Hill/Thurcroft Close/Raleigh Street.		Design updated and route simplified on large scale plans. We need to see detailed plans.
	Upgrade the path along eastern side of Kingsway from Brackensdale Avenue to the A5111 part of Kingsway (at least beyond the new crossing linking with Kingsway Park Close) to create a continuous, off-road segregated path.		This is marked as outside the scheme area.
	Install a NMU priority crossing (ideally signal controlled, at least a parallel crossing) for the NMU routes where they cross the new link road with Kingsway Park Close		Plan updated to include a controlled crossing. Type not specified.
	Cycle access is required along Kingsway Park Close to enable cycle access to family-oriented places along there: Clip and Climb Derby, Hickory Dickory's Playhouse and potentially a new swimming pool.		Kingsway Park Close will become a busy road, and families need to be able to get access to facilities in that street by bike. Cycle paths are not planned and a parallel crossing into the side road is required.
	There need to be NMU links over the new A38 over-bridge on the A5111 to give options for people: eg Mickleover Greenway direct onto the A5111, avoiding the deviation down to Brackensdale Ave.		Path is planned, linking Manor Kingsway development with Brackensdale School
	The crossings proposed where the NMU link on the A5111 A38 overbridge crosses the A38 entry/exit slip roads need to be signal controlled so that children can safely use the route to get to school.		Uncontrolled crossings planned
	The entry slip roads to the A38 southbound and onto Kingsway Park Close need to be a single lane, and not two lanes, to encourage safer driving styles and reduce speeds as drivers enter these exit points.		Aggressive driving styles and faster speeds pose problems and risks at the proposed NMU crossings at these points with dual lane exits. We recommend single lane exits to be provided; the two lanes planned will merge within a few yards into one lane anyway.
	An off road link between the existing NCN cycle path from Mackworth Park, along Greenwich Drive South to its junction with Brackensdale Avenue would provide an enhanced cycle route to Brackensdale School.		The Statement of Common Ground states that this is planned.

	The crossing of Brackensdale Ave by the cycle paths on the east and west sides need to be focussed on NMUs and must give some priority over motor vehicles		This could be parallel or signal controlled crossings, with measures to keep vehicle speeds very low. A controlled crossing is only planned on the eastern side
	Create a continuous, off-road segregated shared path along the western side of Kingsway from Markeaton Island to Brackensdale Avenue.		The plans so far indicate a messy route, sometimes on-road, sometimes off-road. This route facilitates family walking and cycling journeys to Markeaton Park; parents don't like swapping off then on-road with their children. This criterion creates a simple, direct, route.
	NMU priority across the entrance to McDonalds and the Esso garage		Can the entrance to these sites be restricted to Ashbourne Road only, and tied in with the access to Markeaton Park? This would create many advantages for NMU crossings in both locations.
	Ideally, the off-road segregated shared path along the eastern side of Kingsway would be continued along the A5111 Kingsway, beyond the link with Kingsway Park Close, to the Kingsway Retail Park junction.		
3. Markeaton/A52 Junction			
	Retain the "curly bridge" from Markeaton Street to Markeaton Park, widened (4m) with higher parapet and enhanced to enable shared use by cyclists and pedestrians		Direction of entrance to ramps should reflect main travel from/to Markeaton Street
	Signal controlled cycle crossings on all arms of the revised Markeaton Island: . Single stage crossings on Ashbourne Road in both directions		Ashbourne Road by the Esso garage is not currently controlled and is an unacceptable type of crossing for this busy, wide, fast moving, entry and exit to the roundabout.
	The NMU path on the eastern side of Queensway needs to be brought up to the national standard as part of this project.		The pathway should be upgraded but we need details of the design/width etc. There is a fence bounding it, so a 3m path is inadequate.
	The NMU path on the western side of Queensway needs to be brought up to a national standard as part of this project		The pathway should be upgraded but we need details of the design/width etc.
	The junction at the top of the slip roads, on the eastern and western sides of Queensway, needs signal controlled crossings for the NMU path and a safer design for cyclists and pedestrians.		The project team say that this is outside of the project area. It needs a coordinated plan with Derby City Council
	Approaching from Derby along Ashbourne Road, there needs to be an on-road option: a cycle lane approaching the junction and an ASL/cycle box at any traffic lights, which allow riders to stay on the road to go round the roundabout. Access to the off-road paths is also needed.		Providing options for more and less confident riders. Facility is shown on latest plan, but details are needed.

	When leaving the Markeaton Island on the cycle paths, any access back onto the road should be via a constriction of the main carriageway and an offset kerb, allowing cyclists to enter the carriageway parallel to traffic.		This is best achieved at the signal controlled crossing - restrict the carriageway width and route the cycle path onto the carriageway at the crossing.
4. Little Eaton/A61 Junction			
	Retain signal controls on the crossings of the what will become the A38 slip roads.		Uncontrolled crossings are not appropriate because the desire is for children, their parents and families to feel safe using these off-road routes.
	Ensure parking at the cut-off end of Ford Lane cannot block access to the cycle and pedestrian paths.		We need to see designs to prevent this.
	Create a segregated, shared use path leading south along the A61, away from Little Eaton island.		No commitment to segregation
	Create a NMU priority crossing over the entrance to Ford Lane near Starbucks, and across the entrance to Starbucks its self.		Outside of plan area; this needs a coordinated plan with Derbyshire County Council
	The uncontrolled crossing previously proposed over the A61 immediately south of the Little Eaton island has been removed from the plan; it needs to be replaced with a signal controlled crossing further towards Pektron Island, to replace the existing, dangerous, uncontrolled crossing towards Croft Lane and Breadsall village.		The project team state that this crossing is planned, but it will be delivered separately from the A38 Junctions project by Highways England - we need to see the details of this.
	The underpass beneath the A38 for NMUs travelling from Ford Lane (West) towards Darley Abbey by the river, should be retained and ideally enhanced. The facilitation of the Derwent Valley Cycleway (DVC) is a primary importance in this area.		Any further works to develop part of the DVC would be very welcome.
	Associated with the motor traffic improvements, the widening of NCN 54 southwards from Little Eaton Island to Pektron Island (especially from the end of the dual carriageway) is needed to encourage more cycle journeys along this route. There needs to be: <ul style="list-style-type: none"> . A segregated shared path all the way from Little Eaton Island to Pektron Island. . A parallel crossing at the end of Alfreton Road outside Pektron to allow cyclists to regain access to the road in safety . A cycle access point from Alfreton Road onto the cycle path, avoiding cyclists slowing in traffic to access the path. 		NCN54 path between Pektron Island towards Little Eaton Island has been improved with widening of the path itself, but has not been segregated and the access/exit at Alfreton Road has not been upgraded.

	EITHER: The existing shared path on the north side of the A38 between Little Eaton junction and Ford Lane is extremely narrow and needs to be widened to a good national standard.		The path is ridiculously narrow because of barriers protecting the rail bridge parapet, which have been placed on the NMU path. Extra space can be gained utilising the area currently occupied by the Ford Lane slip road, and if the A38 exit slip road was to be designed as a single lane at the point where it crosses the rail bridge (only opening out to two lanes once over the rail bridge) then there would be enough space for a segregated route.
	OR: If the shared path on the north side of the A38 over the railway between Little Eaton junction and Ford Lane is to remain as it is, then a new, segregated cycle/pedestrian path should be created to the south of the A38, connecting the Little Eaton junction with the NMU underpass and then on to Ford Lane.		This would be additional to the path on the north of the A38 (which needs to remain because it provides the most direct route for journeys between Little Eaton and Allestree). Note: This option has been considered and rejected by the project team.
	* RAG Key:		
	Red - the stated design has an issue.		
	Amber - some requirements are met, others to be finalised		
	Green - the stated design is good		
	Purple - new or updated item, waiting feedback from project team.		

Appendix 2: Congestion Mitigation for Non Motorised Users

A38 Junctions: Congestion Mitigation for NMUs Checklist

Submitted by Derby Cycling Group, November, 2019

Construction of the A38 Grade Separated junctions will inevitably cause congestion during construction. Many residents in Derby are concerned that traffic will deflect off the A38 and queue up on local streets.

Issues this will cause include:

- . Degradation of air quality caused by motor vehicle pollution
- . Risks to health of residents living in congested streets
- . Delays and extended travel times on the road
- . Economic impact of delayed employee arrival for work, delivery of goods, customer satisfaction etc

There is also, however, an enormous opportunity to enable travel behaviour change:

- . If people who do not want to wait in queues use alternative forms of transport for local journeys
- . Particularly with Active Travel (walking and cycling)

Congestion its self will deter some walking and especially cycling. We need to invest in Active Travel infrastructure BEFORE construction starts. It is essential to:

- . Provide alternatives to driving
- . Promote those alternatives with publicity and public events
- . Make people think about walking and cycling

Here are some facilities which could be provided to enable active travel to take place:

No.	Facility	Comments
Little Eaton/A61 Junction		
1	Install the signalised crossing over the A61 towards Breadsall	
Markeaton/A52 Junction		
1	Upgrade the Kedleston Road junctions with the A38 slip roads to a much higher standard and make them safer for cyclists and pedestrians to use.	
2	Create a cycle link between Kedleston Road and Watson Street / Mackworth Road	
3	Install cycle lanes along the full length of Kedleston Road from Broadway to Five Lamps	
Kingsway/A5111 Junction		
1	Upgrade the quality of cycle paths from Uttoxeter New Road to the A38 along Kingsway A5111	The quality is very variable, the cycle path peters out at Uttoxeter New Road, there are only pelican crossings on Kingsway at Uttoxeter New Road.

2	Install toucan crossings @ junction of Kingsway and Kingsway Retail Park	No signal controlled crossings at the moment.
3	Install toucan crossing over A5111 at A38 roundabout	No signal controlled crossings at the moment.
4	Create cycle paths from Kingsway alongside the main access road into Kingsway Retail Park, linking to all areas of the site with secure cycle parking	Enable more journeys to the retail park by bike, enabling local people to by-pass congestion on the entry/exit.
Away from construction site:		
The connections below will enable more people to use a bike to travel on local journeys and avoid driving on the congested roads. If these facilities are provided, then publicity and promotion of them as means to beat the congestion will help to raise awareness and get people who do not currently cycle to start.		
1	Ashbourne Road: cycle paths from Markeaton Island to the junction of Friar Gate/Bridge Street	Links to existing cycle lane from Bridge Street along Friar Gate into the city centre.
2	Connecting the entrance to Royal Derby hospital on Uttoxeter New Road to the Rowditch via an off-road, two-way segregated cycle path, then on-road along Hoult Street.	Enables more people to travel to hospital by bike, enabling them to by-pass congestion. This will link into existing infrastructure between Hoult Street along Drewery Lane to the city centre.
3	Make the Uttoxeter New Road / Manor Road / Kedleston Road junction into a cycle-centric junction with cycle paths and cycle-friendly crossings over all arms of the junction.	Key junction for journeys to/from Royal Derby Hospital
4	Create cycle paths along Alfreton Road and through Chester Green between Pekton Island to St Marys Bridge	
5	Create a new off-road, two way, cycle path alongside the A61 between Pektron Island and the BMW garage, with a crossing at the end towards Racecourse Park, a link onto Mansfield Road and cycle paths or lanes along Mansfield Road / Stores Road / Nottingham	
6	Construct the Derwent Valley Cycleway between Haslams Lane and Ford Lane	Issue that the A38 rail bridge crossing will be affected by the construction works, so A61 cycle route will remain an important one.
7	Create cycle paths along Duffield Road north of the A38 towards Duffield, with cycle paths and cycle-friendly crossings on the A6/A38 (Palm Court) roundabout. These would link with the cycle lanes between the A38 and Broadway	Motor traffic speed reduction is also required for traffic on Palm Court roundabout as well as cycle infrastructure.

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|---|-------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|
| 8 | Create NMU priority crossings over the entry to Ford Lane off the B6179 and the entrance to Starbucks | |
| 9 | Create an access point off the NCN54 to the entrance of Derby Garden Centre | Enables more local journeys by bike to the Garden Centre, avoiding congestion. |