Dear Planning Inspectorate,

This representation is made on behalf of Derby Cycling Group, which is a member based organisation representing over 400 people in Derby and the surrounding area promoting cycling as a healthy, sustainable and cost effective means of everyday transport.

We have reviewed the A38 Derby Junctions scheme in terms of its impact on existing active travel routes (i.e. those used for cycling and walking) and on its potential to create new and improved active travel routes and infrastructure. We see significant opportunities to gain huge benefits for local travel as well as for long distance through-journeys, especially by enabling more everyday journeys to be made by bicycle. However, not enough regard is being taken of outcomes for cycle transport within the project’s basic terms of reference.

Derby Cycling Group wishes to see the project maximise the increase in the number of local journeys made by bike and on foot, so that these help to mitigate the pollution related to motorised transport along the A38 and the inevitable congestion around Derby during the scheme’s construction. Our areas of interest include:

- Retention of all existing cycle routes
- Development of new and upgrading of existing cycle routes to the latest standards regarding:
  - Quality of provision
  - Standards of design and construction
  - Cycle permeability
- Mitigation of the congestion caused during the construction phase by delivering infrastructure that enables more cycling, so people can choose to use a bike to avoid the worst of the congestion
- Safety of cyclists and pedestrians from construction vehicles:
  - Mandated minimum standards of cyclist detection equipment required to be fitted on all construction vehicles
  - Ensuring cyclists and pedestrians can safely cross site access routes (e.g. entrances with the main highway and where non-motorised user routes are within the construction area)

We would like the project to have greater ambition in design and completeness of the non-motorised user (NMU) routes. Many of the issues concern details, but without joined-up routes, these routes will be under-utilised and will not maximise the return on investment.

We have a major concern that there is a risk of:

- Severance of local communities by the upgrade of the A38 junctions
- Increased congestion caused by displacement of motor traffic within Derby and near to the project sites. This will be extremely detrimental to active travel due to:
  - More traffic causing increased risk, increased danger and increased perception of danger by pedestrians and cyclists
  - Reduced air quality
- Increased danger to cyclists and pedestrians from construction traffic during the construction phase
- Out of date design standards being employed on the project for NMU routes. We urge that the forthcoming Department for Transport standards are adopted.
We have previously submitted a checklist to the project team, listing items we would like to see delivered as part of the scheme. We are pleased with the positive response to mitigate some of these issues; we have had feedback relating to the retention and development of cycle routes and are pleased that some improvements have been made to the original NMU plans. However, we are concerned that:

- There remain loose ends and current standards (such as with segregation) are not being met
- We have not seen any information regarding:
  - Vehicle safety equipment standards
  - Safe crossing of access routes
- Mitigation of construction phase congestion has not been discussed (for example an Ashbourne Road cycle route, improvements to the A61/Alfreton Road and to the A5111 Kingsway, amongst others, to provide alternatives to driving during the inevitably congested construction period).
- There has been no confirmation that all NMU routes will remain open and fully accessible during the construction phase, which must happen.

Finally, we have some specific NMU route issues

- Uncontrolled crossings over two lanes of traffic on slip roads at the Kingsway junction
- Discontinuous cycle routes and the lack of a controlled crossing on the A52 across the entrance to the Macdonalds/Esso garage site
- A significantly sub-standard route (ridiculously narrow) alongside the A38 between Little Eaton island and Ford Lane where it crosses the rail bridge.
- Lack of marked crossings over the Ford Lane exit from the Little Eaton junction and at the Starbucks entrance.
- A general reluctance to introduce segregation: pedestrian/cycle segregation should be the standard because these routes have the potential to become very well used, and indeed the A61 cycle path already is well used.

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.

We look forward to taking a positive and active part in the planning inspection process, and hope that our concerns can be addressed.

Yours faithfully,

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