Dear Planning Inspectorate,

Prior to attending the Issue Specific Hearing on 19th February 2020, Derby Cycling Group reviewed the new issue of the A38 Derby Junctions Traffic Management Plan (issue 7.4a) against suggested amendments we had made as part of our Deadline 3 written submission, following the Issue Specific Hearing on 11th December 2019.

We were disappointed to note that very few, if any, of our suggestions have so far been incorporated into the Traffic Management Plan.

We very much hope that the Traffic Management Plan can be updated to include matters affecting cycle and pedestrian traffic as well as motorised traffic as we have suggested.

I would therefore like to draw the attention of the planning inspectors to our previous submission, as well as our current response below.

This written submission is in five parts, relating to:

A) General points relating to agenda Item 3d - the Traffic Management Plan
B) Specific points relating to agenda Item 3d - the Traffic Management Plan
C) Agenda item 3g – Ford Lane bridge
D) Agenda Item 4a: Footpath diversions at Little Eaton
E) Agenda Item 9e: Cyclist and pedestrian safety mitigation measures

A) General Points Relating to the Traffic Management Plan

Agenda Item 3d:

1. Issue 7.4a of the Traffic Management Plan (TMP) does not incorporate details relating to non-motorised users (NMUs) to the extent we suggested at deadline 3.
   - The Traffic Management Plan is still a motor-traffic management document, but cyclists and pedestrians are also traffic and should be planned for to the same level of detail as motor traffic.
   - Managing non-motorised traffic effectively is essential if the current level of NMU traffic is to be maintained during construction of the scheme. We do however hope that a more ambitious objective will be set to facilitate an increase in the amount of NMU traffic, year on year, throughout the construction period.
   - There are no details in the TMP about how NMU route diversions will be designed, managed, consulted on or bought off.

2. There is no statement in the TMP about maximising the growth of active travel during construction, which we have outlined above. We think this is a critical challenge for the project to address.
   - Do the project team intend to target a growth in the number of NMU journeys?
• If not, why not?
• If so, how does the project team intend to achieve this objective?

3. The Traffic Management Scenarios within section 3 of the TMP, set out in some detail how the motor traffic will be managed during each phase of the construction works, but there is no mention of how NMU routes will be managed at the same time.
  • Will the project team please update the traffic management scenarios to include details of how NMU routes will be affected and managed at each phase of construction.
  • Can the project team please define how the continuity of NMU routes will be achieved throughout construction, what diversions will be planned, how the diversionary routes will be designed and to what standards, and how these will be consulted on and bought off with NMU stakeholders.

4. One thing which has been added to the TMP in Issue 7.4a, is much reference to the Derby Behaviour Change Group.
  • We would like to thank the project team for recognising this group of disparate organisations, all trying to plan their businesses during a period of significant traffic upheaval in the city.
  • We are please that meetings have begun, that they are intended to be very regular, and that a strong roadmap for registering stakeholders issues and concerns and discussing them has been put in place.
  • Without doubt there are many challenges about how the issues and concerns can be progressed, especially in the timescales available. Derby Cycling Group hopes that with a collaborative approach, they will all be successfully resolved.

B) Specific Points Relating to the Traffic Management Plan

Agenda Item 3d:

In addition to our previous comments at deadline 3, we would like to add or highlight the following relating to the paragraphs indicated:

1.3.1 As part of the purpose of the TMP, to add the vision “to grow the number of NMU journeys running through the construction area, year on year, throughout the construction period”.
2.6.2 Table 2 “Traffic management restrictions” needs a companion table to document the corresponding NMU restrictions
3.1.1 Add the following highlighted text: “Maintain existing journey times along the A38 and associated cycle routes”
3.1.2 The Customer Satisfaction table, 3.1, gives requirements of “all motorists” in some detail; NMUs need a similar level of detail (eg notification or diversions, collect and monitor NMU customer experience etc).
5.2.2 At the ISH on 19th February, we specifically raised the following request: that as well as providing “cycle ways (through the scheme) where they are currently located”, that cycle ways be provided everywhere where a cycle path will be included in the final scheme, even if there is no such provision at present.
  • We ask this so that more continuous, off-road, cycle routes can be provided alongside the entire length of the scheme, to facilitate a switch from driving to cycling for anyone wishing to do so.
  • People who are driving but want to cycle to avoid congestion, will not be cycling through the roadworks; this will be especially daunting. However, cycle paths alongside may enable more people to take up cycling as an option.
  • Some specific places would be the A52 across the face of the Esso/Macdonalds entrances, to access the A38 crossings leading to Ashbourne Road and Queensway from Mackworth; also the western side of Queensway, which may at times be preferable to the existing paths on the eastern side. There could be other suitable locations as well.
C) Ford Lane bridge

Agenda Item 3g:

We noted that there was conversation about narrowing of the Ford Lane bridge to prevent heavy goods vehicles from overloading the bridge by more than one crossing it at the same time. We would like to comment that any narrowing of the bridge must avoid potential conflict between motor traffic and cyclists who may be crossing the bridge at the same time.

D) Footpath Diversions at Little Eaton Junction

Agenda Item 4a:

Derby Cycling Group would like to reiterate our total support for the controlled cycle/pedestrian crossing over the A61 between Pektron and Little Eaton islands. This crossing will facilitate significantly more cycling to and from Breadsall village and beyond, heading towards Derby City and Little Eaton. We regard the inclusion of this crossing as a matter which is independent of the issues under discussion regarding the re-routing of footpath 3 (FP3)


Agenda Item 9e:

Following our comments in our deadline 3 written submission, Section 15a part ii and section 6 of our original Written Representation, we are still awaiting information regarding safety measures that will be put in place to safe guard cyclists and pedestrians from construction traffic, especially heavy goods vehicles and abnormal loads.

Can the project team please tell us:
- What measures are being taken regarding non-motorised user safety?
- How will they be consulted upon and bought off?

This matter has been thrown into sharper focus following the death of an experienced cyclist on the A52 very near to Markeaton Island following a collision with a heavy goods vehicle. Such tragic incidents reinforce the need to ensure that transport systems keep cyclists as safe as possible at all times. Tragic events such as this make an impact with the general public and cause a perception that it is not safe to cycle. This perception is not a good reflection of reality, but perceptions drive people’s behaviours just as much as reality.

Derby Cycling Group hopes that the project team can set an objective to have growth in the number of cycling and walking journeys along the NMU routes, through the construction areas throughout the construction period. This will enable people to not only seek an alternative to driving on roads which are more highly congested, but to also enable those who seek to use more sustainable methods of transport as a consequence of recent increased awareness of the effects of climate change, health impacts of sedentary life styles and poor air quality, to realise their own ambitions.

I look forward to hearing responses to our questions and hope that our suggestions can be acted upon in due course.

Yours sincerely,

Tony Roelich
Campaigns Co-ordinator
Derby Cycling Group