



Derby Cycling Group,
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16th April, 2019

Reference: **Derby Local Air Quality Plan – Objection to the removal of cycle lane on Friar Gate**
An open letter from Derby Cycling Group

To Therese Coffey, MP,

Derby Cycling Group continues to object in the strongest possible terms to the proposed removal of a safe haven cycle lane on Friar Gate in Derby as part of Derby City’s proposed clear air strategy. Removing this cycle lane will make it more dangerous to cycle here and will indeed lead to fewer people cycling here. That is a bad thing to happen on a key route into the city centre, as part of a clean air strategy, when air quality is so poor in this area.

We ask that:

- 1. You reject this aspect of Derby’s business case for tackling air quality.**
- 2. You require that any cycling provision in the area affected by the clean air proposal has to be retained or improved to a better standard than exists today.**

We ask that you support our view that enabling more cycling and walking should be a cornerstone of Derby’s clean air strategy. The City Council must not remove existing infrastructure without providing something better. This proposal for tackling poor air quality in Stafford Street will make road cycling more dangerous on Friar Gate.

We are however also concerned about various misrepresentations that have occurred in relation to the proposal to remove this cycle lane, the supposed alternative which is available, and the suppression of the amount of support there has been for more cycling infrastructure as part of the air quality consultation, within the full business case.

Some of our members have received letters from DEFRA which give views of the Derby proposal, to which we disagree:

One statement is that the cycle lane on Friar Gate is **“a very short section of bus lane which is also used by confident cyclists.”**

- There are several untruths about that statement:
 - The cycle lane *is* a cycle lane as well as a bus lane! The roadside and on road signage shows this unequivocally.
 - It is used by all sorts of cyclists.
- The cycle lane may be “very short” but it is a crucial safety element for cyclists on this piece of road. Size isn’t everything!
- Is it alright to have dead or injured cyclists so long as they are confident ones?



Regarding the off-road path alongside Friar Gate, DEFRA say that it is OK to remove the on-road cycle lane because the off-road path is a suitable alternative. Quote **“The NCN routes 54 and 68 already use a diversion to take cyclists past this junction to link directly to the existing off road cycle route on Friar Gate”**

- This is indeed a “diversion” but good cycle routes follow continuous and direct routes, not diversions.
- DfT standards say that cycle routes should be direct and continuous.
- The Friar Gate off road cycle path has many faults:
 - It is on the wrong side of Friar Gate for cycling into the City Centre; it is on the opposite side to the on road cycle lane.
 - It is only useable by people travelling in a specific direction (it does not cater for people travelling along Ashbourne Road into town).



- It is of very poor quality by current cycle path standards.
- It is fraught with hazards:
 - Very narrow in many places with tree roots making a rough surface which can be dangerous.
 - Cyclists have no right of way at side roads, which poses its own risks.
 - There are severe cobbled sections which are rough and are slippery in the wet.
- It is slow and indirect:
 - Cyclists heading into town will have to cross moving traffic on Friar Gate to get onto the cycle path.
 - It only runs for 1/3 of the length of Friar Gate.
 - Cyclists then have to negotiate three sets of traffic lights in order to cross the street again, to rejoin the road at the Stafford Street junction.
- By contrast the on-road cycle route:
 - Is direct and continuous over the full length of Friar Gate.
 - Provides rights of way over traffic emerging from side roads and driveways.
 - Is made safe by the provision of that short length of cycle lane, as well as the cycle/bus/taxi-only section of road from Bridge Street to The Warwick.

The DEFRA team say there was overwhelming support for this traffic management approach during public consultation – but

- That was only for the traffic management option over the two clean air charging zone options in stage one of the selection process (what a choice!)
- In the Preferred Option consultation (Section 4, page 6):
 - **“The majority of respondents** (42.9%) said that they strongly disagree/ disagree that the preferred option addresses roadside NO2 in the shortest possible time.”
 - **“The majority of respondents** (44.4%) strongly disagree/ disagree that the preferred option maximises benefits and minimises costs for the Government.”
- They say there has been considerable engagement with local cycling groups, but omit to say that Derby Cycling Group emphatically opposes the removal of the cycle lane.
- A lot of responses in the consultation documents which support cycling have been omitted from the Full Business Case (see below).

DEFRA have commented:

“This government is committed to increasing cycling and walking and making our roads safer for vulnerable users”.

- In our view, in a contest to choose the best cycle route into town along Friar Gate run by a government committed to making roads safer for vulnerable users, the on-road cycle lane would win hands down.
- Why? Because by removing it makes the road more dangerous for the most vulnerable on-road users – cyclists.

We are also very concerned about certain aspects of Derby City Council’s Business Case.

The [Full Business Case](#) barely mentions cycling; sometimes it is notable by its absence:

- Figure 3 (page 23) excludes details of the changes to the Friar Gate/Bridge Street junction, where the cycle lane is to be removed. Why would the city council want to hide the removal of a cycle lane from the public and DEFRA’s view?
- Section 2.4 (“Preferred Scheme”) also contains the following misleading point: “Changes ... on Friar Gate to help provide alternative route choices”. On the contrary:
 - The removal of the cycle lane will reduce the choices open to many cyclists; many will stop cycling here altogether; many others who may have considered cycling will never start.
- As cycling should be a significant element in any long term air quality improvement strategy, this is a lamentable situation and the very words show that active travel has never been considered as part of this air quality plan; a shameful indictment.
- The lack of mention of cycling is in spite of the air quality consultation showing that people in Derby want better cycle routes:
 - The [consultation for the three initial options](#) showed that, from 2,537 responses:
 - In Chart 4 (page 9) : **61.2% (4th highest)** thought switching to lower emissions transport modes (such as cycling) can improve air quality.
 - In Section 5.1.11 (page 9), **the top 3 suggestions** for how to tackle air quality issues included “more cycle lanes or an improved cycling infrastructure”.



- In Chart 5 (page 10): **31.7% of respondents (4th highest)** use a bicycle as part of their current transport menu (this was omitted from the summary, but the 6th highest (Train at 22.2%) was quoted instead! Why omit the statistics for cycling?
 - From the 189 responses to the **final proposal consultation** :
 - **44% (4th highest)** supported greater use of active travel investment and promotion (Chart 4, page 16)
 - **41.7 % (5th highest)** supported expansion of the e-bike share scheme (Chart 4)
 - The most common “other comment” (17) called for increased cycling infrastructure.
 - So why is the cycle lane on Friar Gate being removed? Removal runs contrary to what people in Derby say they want.

In summary:

The on-road **cycle lane** on Friar Gate **is a cycle lane**, and is an essential safety feature for all kinds of cyclists. It is **the** thing which enables most of those people cycling here to be there in the first place. The desires of so many people in Derby to have more cycling infrastructure must be upheld. The cycle lane must be retained or replaced with something different which gives the same or better continuity and directness of route AND, therefore, enables the route to be developed further in the future (such as by putting cycle infrastructure along Ashbourne Road, which leads down to this location).

We think the views of many respondents are not being accurately reflected in the Derby proposal and some of the consultation findings have been muted, omitted or suppressed, which could materially affect the outcome of the review of the Full Business Case.

I would very much appreciate an opportunity to discuss directly with you the importance of retaining the Friar Gate cycle lane or changing it to something at least as suitable, in the interests of people’s safety and of enabling cycle transport to develop and grow in the future along this important arterial route into Derby City Centre.

More cycling, equating to a permanent improvement in air quality.

Yours faithfully,

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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.

