

D2N2 LCWIP Feedback

Completed: February 2023

Derby Cycling Group details

<https://derbycyclinggroup.org.uk/>

The Derby Cycling Group is a voluntary organisation that campaigns for a cohesive cycle network in and around Derby and champions cycling to create an environment where it is safe, normal, convenient and fun. Membership is currently 340 people. The group has been in existence since 1979.

Derby Cycling Group members attended the 3 stakeholder feedback workshop events in 2018 and 2019.

This represents opinions on behalf of the Derby Cycling Group regarding the LCWIP as published at <https://lcwipeastmids.consultation.ai/> Feedback in this document addresses the cycling aspects, particularly in the area around Derby and does not address the walking aspects.

Summary

As a Group we're pleased to see the LCWIP nearing completion and agree with a lot of the aims of the document and the process.

The major focus of our feedback can be summarised under the following points:

- The need to gain understanding of the plan for Derby and surrounds. The Plan currently does not provide an easily understood map of the routes that are proposed for the Derby area over the next 15 years. This is essential.
- The delays in the creation (and consultation) process of the Plan are such that a review is now due according to the documented timescales. In addition there have been significant changes in the local priorities requiring that the Plan should be re-assessed. The process of data collection needs to be started now for Version II of the plan.
- The stage of the plan for collecting suggestions for possible routes from the public and key stakeholders has been omitted for the Derby area. As part of the work for Version II of the plan, we believe that a formal public suggestion phase should be included to allow for a long list of possible routes to be identified and then analysed. This process was followed by Derbyshire for their Key Cycle Network and a similar process should be repeated for the Derby City area (and its surrounds). As part of this consultation Derby Cycling Group should be identified as a key consultee.
- Certainly for the Derby area there has been an exclusive focus on reviewing new possible routes whereas we feel there are also significant benefits to be obtained from connecting together existing (disconnected) routes. We feel the plan should also review the existing

disconnects in the local network and these should be included in a prioritisation and implementation plan for a coherent and connected network.

- Although the plan has been nominally created across Local Authority borders we feel that, for the area of Derby and its surrounds, this hasn't been done successfully. A number of key strategic routes within Derbyshire stop at the Derby City boundary. We believe the cross border analysis for the Derby area needs to be redone taking a more holistic approach and not restricting the analysis to the Derby City local authority area.
- The standards for implementation of any scheme should be formally adopted by each Council and should be at the level of LTN 1/20 or similar. The standards should also include plans for maintenance of existing and new routes.

Overall Approach

At 8.2.1 the objectives have a clear economic, traffic management, environmental and health perspective and only when we get to the last objective do we find anything directly relating to cycling:

- Supporting economic growth
- Supporting tourism and the visitor economy
- Addressing transport congestion
- Addressing climate change and poor air quality
- Addressing health deprivation
- Meeting the CWIS cycling and walking mode share target

Also, these objectives are at odds with those set out in the Governments LCWIP guidance:

1.4 The Strategy's objectives, by 2020, are to:

- increase cycling activity, where cycling activity is measured as the estimated total number of cycle stages made
- increase walking activity, where walking activity is measured as the total number of walking stages per person
- reduce the rate of cyclists killed or seriously injured on England's roads, measured as the number of fatalities and serious injuries per billion miles cycled
- increase the percentage of children aged 5 to 10 that usually walk to school

1.5 Further to this, the following aims and target have been set, respectively, to 2025:

- to aim to double cycling, where cycling activity is measured as the estimated total number of cycle stages made each year, from 0.8 billion stages in 2013 to 1.6 billion stages in 2025, and to work towards developing the evidence base over the next year

- to aim to increase walking activity, where walking activity is measured as the total number of walking stages per person per year, to 300 stages per person per year in 2025, and to work towards developing the evidence base over the next year
- to increase the percentage of children aged 5 to 10 that usually walk to school from 49% in 2014 to 55% in 2025

The government's guidance sets clear objectives to increase cycling and walking. Reviewing other Authority's LCWIPs finds they are primarily focused on cycling and walking, frequently adopting the guidance objectives. The problem with the objectives adopted by the D2N2 LCWIP is the document then focuses on those objectives (e.g. economic benefit) which do not necessarily support the fundamentals set out in the guidance. The document has gone to considerable effort to include tourism and visitors into the plan, which may be admirable in encouraging tourism. However, this is at the cost of infrastructure that allows people to make those everyday journeys on their bikes. The outcome is that the document does not have the focus on providing cycling and walking facilities for people's daily journeys.

Gaining an understanding of the Derby area plans

The mapping shown in various places in the Plan is not consistent particularly for the Derby City area.

There is a need for a consistent map that shows all the routes identified as key for the city area. Then a map is needed showing the prioritisation of delivering the key routes together with an explanation of the prioritisation process so that any assumptions made can be understood.



Figure 1: From Feedback site

The above map (Figure 1) shows an extract from the overall network map shown at <https://lcwipeastmids.consultation.ai/> with the broad lines designated as “key strategic / core routes” and the thinner lines designated as “local connecting routes”.

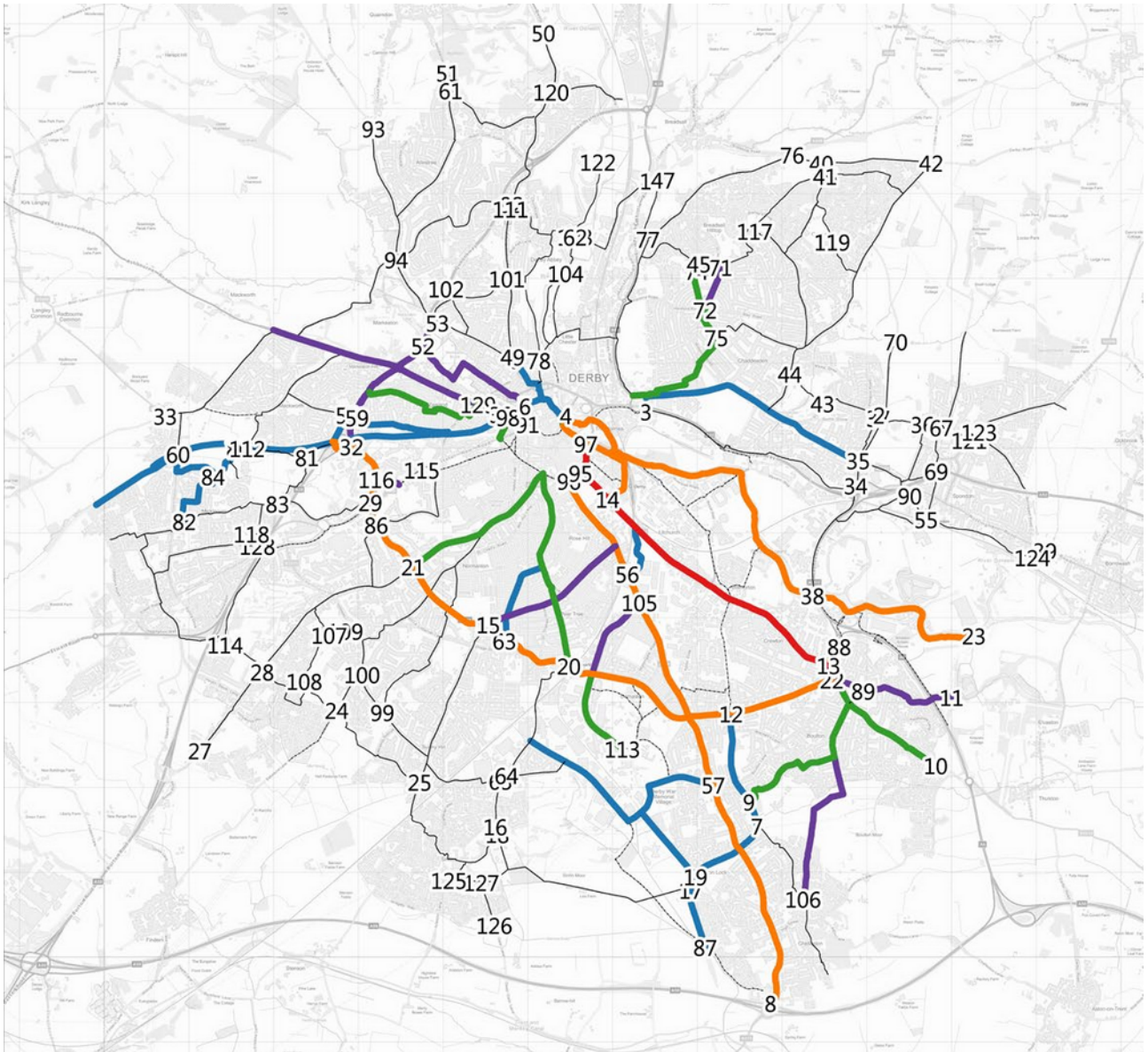


Figure 2: From Derby Delivery Program document

The prioritised routes (Page 40) contain little or no new routes within Derby City with the map (Page 41) showing usage of the existing Riverside Path and the existing routes north through Darley Abbey. There are massive inconsistencies between the maps with the Derby specific one not showing a focus on routes northwards (see Figure 2) but the list on page 40 showing the northwards route as the main short term focus for Derby City.

Figure 2 is taken from the Derby City Council Delivery Programme document (zoomed in for clarity). The original includes a key which is meaningless. From the heading of the map it can perhaps be assumed that the coloured lines represent the priority routes (although this isn't clear).

The coloured lines on Figure 2 (priority routes) differ significantly from the broad lines on Figure 1 (Key strategic routes).

The numbers on each route on Figure 2 are not explained and are thus meaningless. There is also no explanation as to how the coloured routes have been identified as key routes (if indeed that is what they are).

Without a single consistent map showing all the routes that have been identified as important (without regard to implementation) the LCWIP is incomplete. There should then be an additional map showing the priority order for implementation and the basis for that priority setting which can then be reviewed and the underlying assumptions considered. If there is a scoring methodology for setting the priorities this needs to be documented and consulted on.

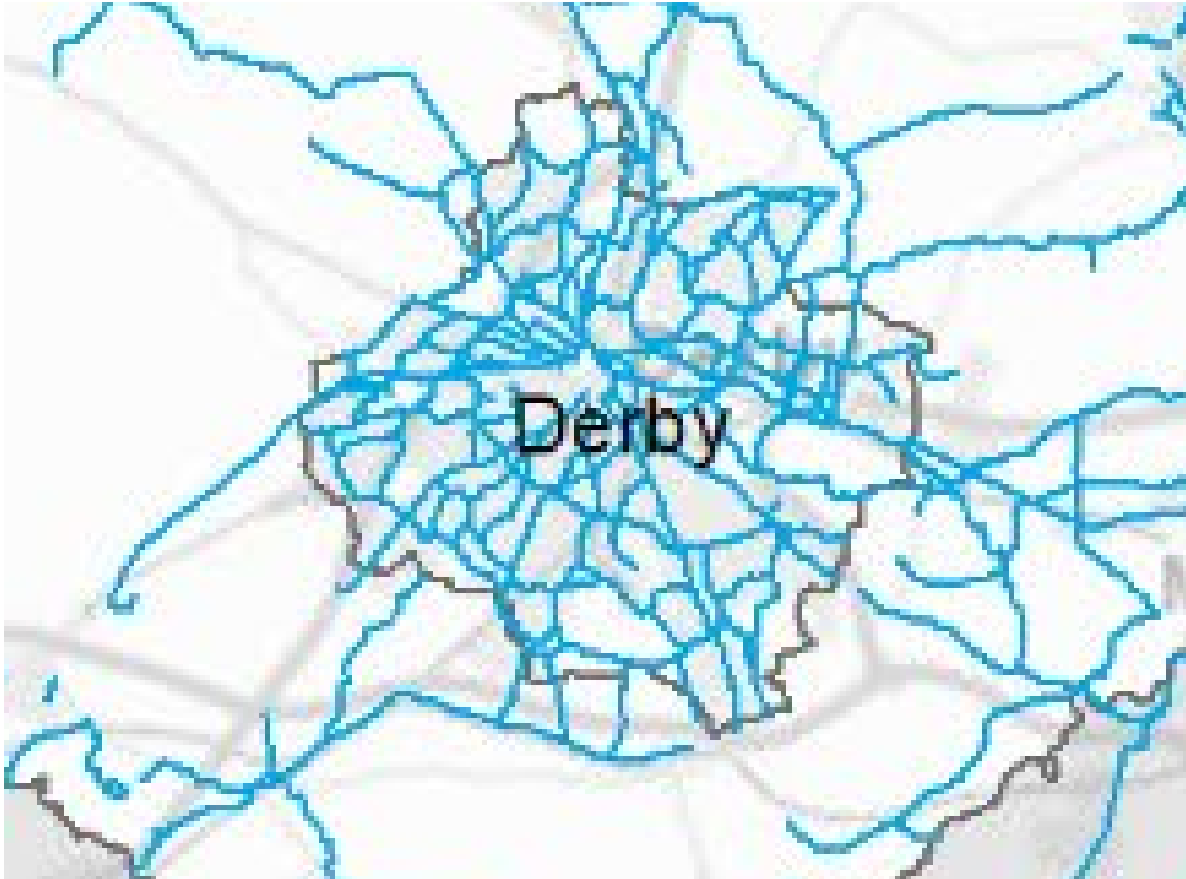


Figure 3: Extract from P101 for Derby area

The above map (Figure 3) shows a section of the overall network as documented on Page 101 of the Plan. This is obviously different in some aspects from Figure 1. This version of the map includes a number of routes which are discontinuous (e.g. near Etwall, near Weston on Trent, near Kedleston). Again this inconsistency between maps for the Derby area is not acceptable.

Need for Version II process to be started now

It is disappointing that the LCWIP document was completed in April 2021 (or before) but that the public consultation will not be complete until 2023. The LCWIP is intended as a living document and asking for feedback on a document that is already out of date is not acceptable (e.g. 4.2.3 says “reflects priorities ... at the time of writing (2020)”).

There have already been considerable changes that impinge on communities and businesses within the area and need to be taken into consideration, such as; changes to the HS2 project, consequences of COVID, cost of living, latest census results, etc.

Significant changes to the area mean that reviews should be undertaken for portions of the LCWIP. For example, the intention to make Allestree Park a “destination” affects the analysis previously done for the north of Derby. As connection to the Toton HS2 station is a key feature of the LCWIP, the cancellation of this project (The Toton Hub) means that significant parts of the LCWIP need to be revisited 4.3.2).

4.5 Kedleston Park is another significant tourist attraction that needs to be included in the analysis. Allestree Park could become a further destination as the rewilding project proceeds.

The East Midlands Intermodal Park near Toyota is planned to provide for over 10,000 jobs and suitable cycle links need to be provided. It appears that this development hasn't been included in the LCWIP planning thereby adding to the need for the process to be revisited.

A periodic review process is described (about every 5 years). 1.3.3 states it “will be regularly reviewed”. Also 8.1.1 identifies that the guidance document advises review every 4 - 5 years and states ‘A five year interval will enable time for some ‘impacts’ to be measured from early schemes’ a spurious claim unless everything is to be done in the last year.

Given the delay in consultation since completion of the LCWIP report, the first review should be measured from the report conclusion time and not from the consultation time (i.e. 2020 rather than 2023). As the draft LCWIP was completed around the end of 2019, it is now approaching time for review and this should be scheduled and publicised.

We would advocate an annual update is published to demonstrate how and where progress is being made, which could then be built into the periodic review and ensure there are no surprises. Having reviews at 4 to 5 year intervals allows projects to drift and lose impetus and therefore regular updates at a frequency no longer than every year are recommended.

8.2 should also be considering the Derbyshire Cycling Plan ambition to be the “most connected county for cycling by 2030” and include objectives to support this goal.

Analysis needs to be redone using 2021 census data when available.

Lack of public input to the plans

3.3.6 describes that 1012 links were identified and “agreed”. No public consultation was held to ensure that the identified list for the Derby area contained all possible links prior to a prioritisation process. This is a shortcoming of the process which must be addressed to ensure communities are engaged.

The stakeholder meetings included information from PJA describing the process to be used for information gathering (presentation on 23rd May 2018). This included:

“Useful sources of data:

- the journeys that people currently make (by all modes of transport) to understand where cycling and walking might be able to form part or all of a journey
- their trip departure and destination points

- the barriers that local people perceive to taking up cycling or walking more frequently
- their views on existing cycling routes and walking provision
- their requests for improvements to existing routes/provision and potential new routes/provision.”

The last 3 data sources (i.e. consultation with the public) have not been undertaken for the Derby area. The omission of this part of the process means that not all possible routes or projects in the Derby area have been considered and analysed.

5.1.3. The Derby Cycling Group attended the three “stakeholder events” but didn’t feel that there was really a realistic opportunity to provide local knowledge, advice and scrutiny. Instead the events were presentations on the approach being taken plus some brief sharing of detailed maps and questions and answers. Rather than information gathering the events appeared to be for “ticking the box” of having done the consultation and for presenting what had already been decided.

The final key outcome in 5.2 “undertaking further engagement” has not been delivered.

5.2.1 states ‘Undertake further engagement once the LCWIP is finalised to enable a stakeholder review’. Surely this is a little late to ensure the LCWIP addresses the community’s needs. This is a fundamental of getting input before finalisation of the plan. Experience suggests that stakeholder review at this stage has little impact as the professionals driving the project are considered to be ‘expert’ rather than the general public who need to get around the city for their day-to-day journeys. A full engagement should be undertaken as promoted by Chris Boardman, Commissioner Active Travel.

4.3 the process of prioritising the routes with the most benefits makes sense. However, the actual routes included in the plans seem to have been selected as either being the easiest to implement or ones that the relevant Council already have in progress. The plan should be identifying the most beneficial routes for communities and the implementation plan can then consider “deliverability”.

Appendix D “Cycle Network Development” details that the strategic network plan for Derby will be subject to “consultation with stakeholders which will also assist with the prioritisation of future schemes” (Page 91). However, this hasn’t been done and there are no specifics of how it will be done for future schemes.

Need for connectivity

There is a need for a measure of connectivity – i.e. how possible is it for people to make varying journeys on well connected quality cycling routes – to be included in the analysis and prioritisation. There are gaps in the overall map and the LCWIP can’t be a network if individual routes are not networked together. There should be some measure of how a particular section of route would improve connectivity rather than considering the benefits of a route purely on the economic or other benefits of that route section.

Costs and benefits of routes may not take note of the presence of an existing cycle route (which it is planned to upgrade). The benefits resulting from this upgrade may be minimal and other

schemes (e.g. new routes) may provide much greater benefits. It appears this has greatly influenced the proposed routes in Derby with enhancements to existing adequate routes attracting most priority. Also, how are the benefits for communities demonstrated when modelling does not consider all users of the infrastructure, trip-chaining, elderly on e-bikes or mobility scooters, cargo bike users, etc.?

There is a need to link up existing good quality infrastructure with funding committed to completing short links and to addressing “danger points” which often prevent users from attempting the full route.

On a wider issue the LCWIP process appears to have concentrated solely on new cycle routes and not on other aspects of infrastructure which will also need improvement. For example, provision of secure cycle parking at any destination is necessary to provide for the desired increase in cycle use.

Lack of consistency across area borders

The decision to create one LCWIP for the LEP area is a reasonable one as a lot of the required routes need to cross between Council boundaries. However, the actual implementation of the LCWIP has been done within Council silos and, apparently, with the individual Council contributions being cut and pasted into the overall document.

The size of Derby City Council’s responsibility is fairly small and there are a number of residential areas around the city that the layman would consider part of the City but are actually in Derbyshire (e.g. Little Eaton, Breadsall, parts of Mickleover, parts of Sinfin, Quarndon, Borrowash,...) and thus just considering the City Council area is not appropriate when considering the “within city” short trips. Many of the commutes from these areas into the centre are perfectly practical by bike.

The approach of treating the cities and associated areas (i.e. “Derby, Nottingham and urban connections”) makes sense but, in reality has been approached by each Council focusing on their area and not properly considering cross boundary links. The desire to link new developments which are outside of the city boundaries to the city cycle network is a good goal but which the proposed LCWIP plans do not appear to address.

Planned residential estates around the edges of Derby City do not seem to have been included in the analysis – but should be. For example, a large estate in Amber Valley (but adjacent to Derby City) next to Kedleston Road has been built without adequate cycle links and with no plans apparent in the LCWIP to address this shortfall.

The Derbyshire Cycling Plan goal of making Derbyshire the “most connected and integrated county for cycling in England, recognised as a world class cycling destination for all” by 2030 is not considered as a goal in the LCWIP. This plan is supported by Derby City Council. The Derbyshire Cycling Plan is briefly mentioned on Page 154.

Any cross Council boundary planning to identify key routes should not result in those routes linking to Derby, being relegated to “local routes” as soon as they hit the Local Authority boundary. The analysis should be redone to ensure that routes linking key areas to Derby city are identified as key routes for their entire length. The map (Figure 1) shows key strategic routes to Derby from Belper,

Ripley and Ilkeston but all seem to end as key strategic routes when they reach Breadsall (which happens to be the boundary of Derby City).

Need to identify the Derwent Valley Mills UNESCO World Heritage Site as a significant destination with the size making travel by cycle between the WHS sites being a viable choice with the right infrastructure. The WHS Management plan identifies the provision of cycle facilities connecting the WHS attractions as a key goal and this needs to be reflected in the LCWIP. Addressing the Derwent Valley as a priority would not only provide a cycle route through the only UNESCO WHS site in England without any significant cycle infrastructure but would also provide a safe cycle route away from the heavily used A6 for those wishing to cycle/commute between the conurbations along the valley – in particular, Duffield and Belper, are within easy commuting distance of Derby and well within the Derby Travel to Work area.

2.5.3 describes a list of schemes from each authority. These should have been drawn up across authority boundaries and should have been included in the document as a full network even if the priority (for whatever reasons) is long term or beyond the timescale of the LCWIP.

Any priority setting for Derby needs to also consider the suburbs outside of the City boundary – Figure 2 does not do this. For example, in the Breadsall / Oakwood area there is NCN 672 (the Breadsall Greenway) which generally lies outside the City boundary. Local connections to NCN 672 (from within the City area) should be a priority but are not identified on Figure 2.

Implementation standards

In 4.2.4 and throughout the document there are statements to the effect ‘The strategic routes are supported by local and town networks that will be developed by each authority, making use of future funding streams and developer contributions to deliver the local route connections’ and Appendix D ‘LCWIP will allow planners to identify developer contributions to deliver sections of the cycle network and provide localised mitigations and sustainability of development’, an admirable aim. This is not the current reality as numerous developments around Derby are not connected to cycle infrastructure, for example developments around Oakwood and adjacent to Kedleston Road.

7.1.2 describes the standards adopted by the local authorities but doesn’t mention the standards for Derby City Council. It is important that all Councils formally adopt LTN1/20 or similar.

7.2.5 needs to be updated to reflect the current status (early 2023) rather than discussing actions that will be taken in 2020 and 2021.

Section 7.2 details the plans for Nottingham City which, in general, seem appropriate. There are no similar plans documented for the other Councils – in particular Derby City which is a joint partner in the delivery of the Transforming Cities Fund. These missing plans should be included.

Demand Data

At 2.3.10 it describes that “the trip data mapped by officers and stakeholders” was identified but this is not documented and thus cannot be considered and reviewed.

The PCT.bike tool now contains school information and this can help in identifying demand for school commuting. An initial consideration of the PCT data for schools shows significant demand for travel to Allestree Woodlands and Darley Abbey St Benedicts as well as other schools in the city area and these haven't been considered in the planning (and should be). As the planning should not just be for the Derby City area, consideration of travel to schools outside the city should also be included (e.g. Ecclesbourne, Duffield). See map below (Figure 4) showing the PCT.bike school analysis for the Derby area.

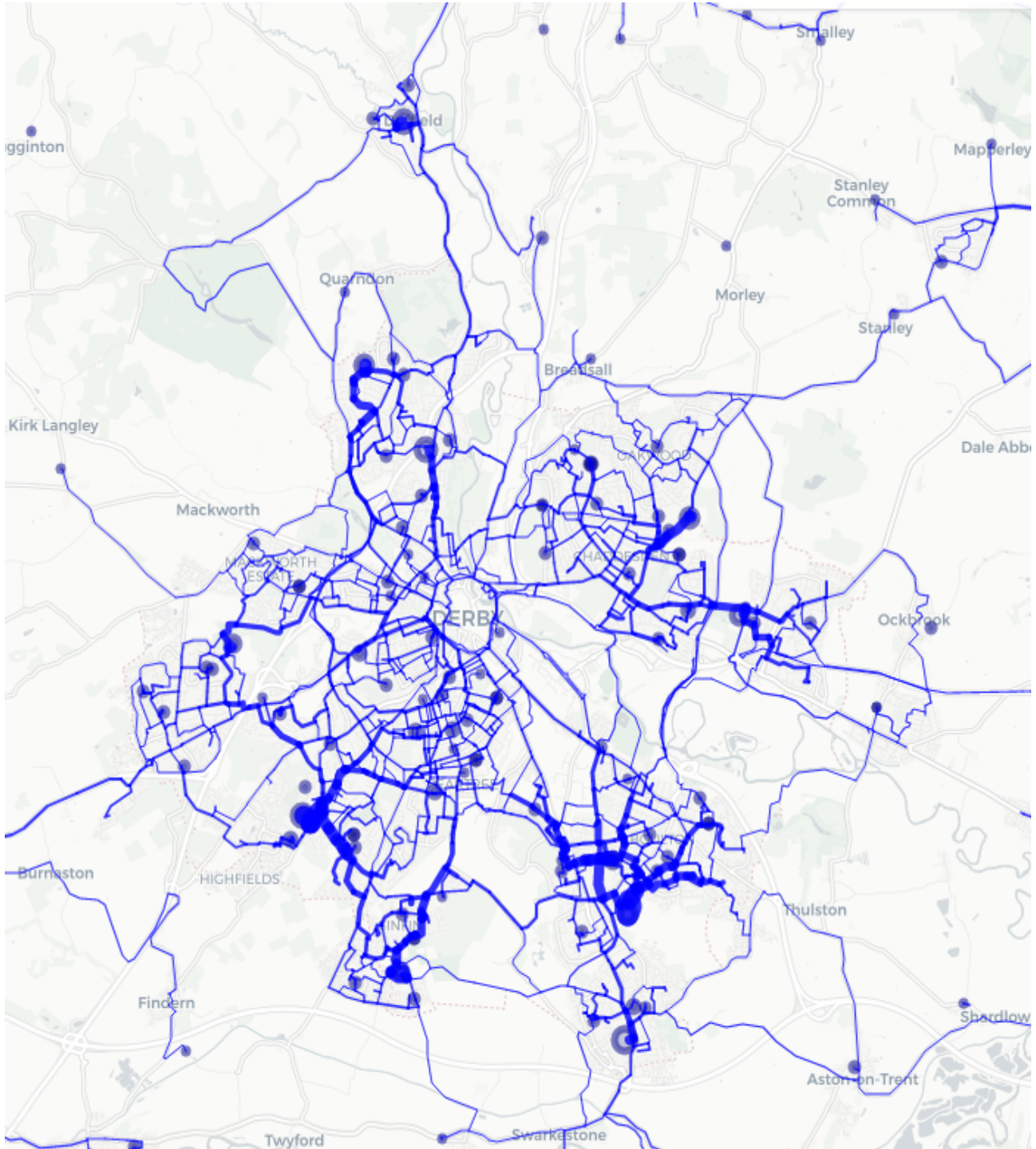


Figure 4: PCT school data

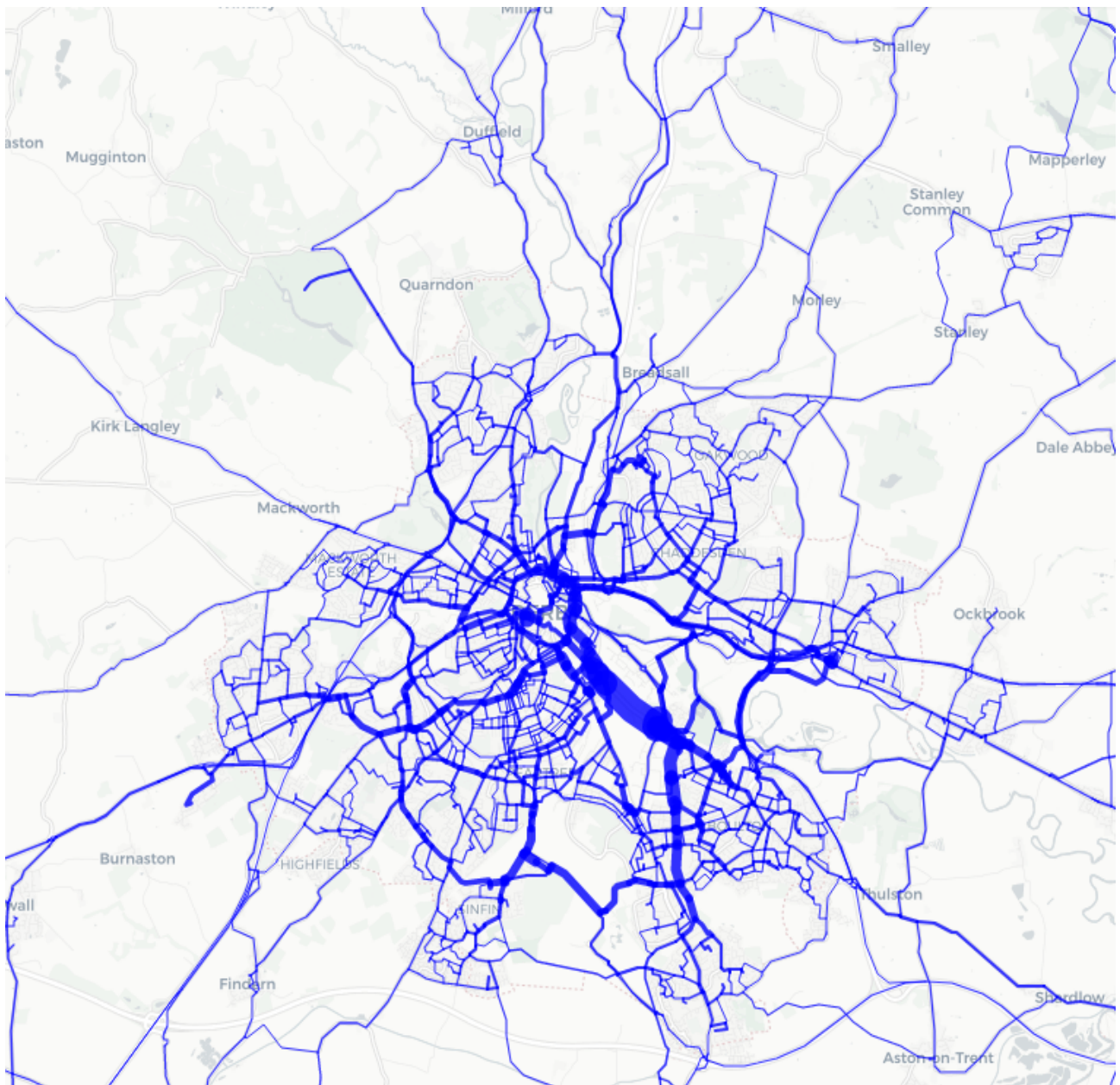


Figure 5: PCT.bike for Derby area

The DfT approved tool for cycle commuting potential (PCT.bike) produces the output shown in Figure 5 above. This has some overlap with the prioritised routes map (Figure 2) but some significant differences - in particular, the PCT suggests prioritisation for Kedleston Road and Sunny Hill areas as important as are links northwards from the city centre.

The mismatch between the PCT.bike output for commuting and the prioritised routes for the Derby area together with the availability now of school data for the PCT are good arguments for the analysis to be revisited.