

D2N2 LCWIP Feedback from Derwent Valley Trust

Completed: March 2023

This represents opinions on behalf of the Derwent Valley Trust regarding the LCWIP as published at <https://lcwipeastmids.consultation.ai/> The comments address the cycling aspects and does not address the walking aspects.

Trust details

The Trust is a Charitable Incorporated Organisation (CIO) run entirely by volunteers. It has previously established the Heritage Way walking route along the Derwent Valley and is now working on establishing a cycling route alongside other projects relating to horse riding and paddling (kayaks, etc.).

Trust members attended the 3 stakeholder feedback workshop events in 2018 and 2019.

The feedback on the draft LCWIP relates directly to the Derwent Valley Cycleway project.

<https://www.derwentvalleytrust.org.uk/cycle/>

Summary

The Derwent Valley Trust will be pleased to see the LCWIP (first version) completed and agrees with the need for, and benefit of, having a long term focus on the desired cycling network for the area.

The main points that this feedback addresses are:

- The need for the routes crossing between local authority boundaries to be considered as strategic routes from end to end and not be downgraded when passing from one authority's area to another. In particular the portions of the Derwent Valley Cycleway in Derby City need to be shown as strategic routes to reflect their status in Derbyshire.
- The method of assessing routes for commuting is based around an urban area and does not accurately reflect the demand for use of a cycleway within a geographically constrained corridor. The consideration of only commuting demand within 200 metres of a proposed route needs to be reconsidered to cater for commuting from a less urban area. In particular, the Derwent Valley Cycleway between Belper and Derby would provide benefits to all residents within the Derwent Valley including those over 200m from the route.
- The time taken to complete the LCWIP (since work started in 2017) means that a review of the current plan is well overdue and work should begin now on version 2 of the LCWIP. The Derwent Valley Trust should be included as a key stakeholder in any work towards creating the next version of the Plan.

- The analysis should include the available school travel data when assessing demand for any route.
- The prioritisation process for Derbyshire routes reflects the process used for the Derbyshire Key Cycle Network. This assessed routes under an “environmental” heading and which penalised routes that are proposed to run through areas of particular natural or heritage value (e.g. nature reserves, heritage sites). While dealing with nature or heritage requirements may make the route harder to deliver, the benefits of the route are greatly increased by providing access to the special sites and this should be reflected by boosting rather than penalising the environmental rating (and its equivalent within the LCWIP process).
- While the Derwent Valley Mills UNESCO World Heritage Site is acknowledged in the LCWIP, a greater degree of importance of the Site should be reflected in the analysis. The Site is one of only 20 World Heritage Sites in England, and the only one in the East Midlands, and there is a massive opportunity to use the LCWIP plans to allow tourism and other benefits of the Site to be accrued.

Cross Local Authority Focus

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 with the individual Council contributions being cut and pasted into the overall document.

The Derbyshire Key Cycle Network routes (the strategic routes as defined by Derbyshire) are intended to link with Derby City and other key destinations. The LCWIP shows that key strategic routes in Derbyshire are downgraded to “local routes” when they reach the city boundaries. See Figure 1.

In particular, the Derwent Valley Cycleway route from Belper and Duffield towards Derby needs to be recognised as a key strategic route within Derby City and reflected on the maps.

The section of the Derwent Valley Cycleway eastwards towards Nottingham also needs to be recognised as a key strategic route throughout Derby City and along the existing Riverside Path.

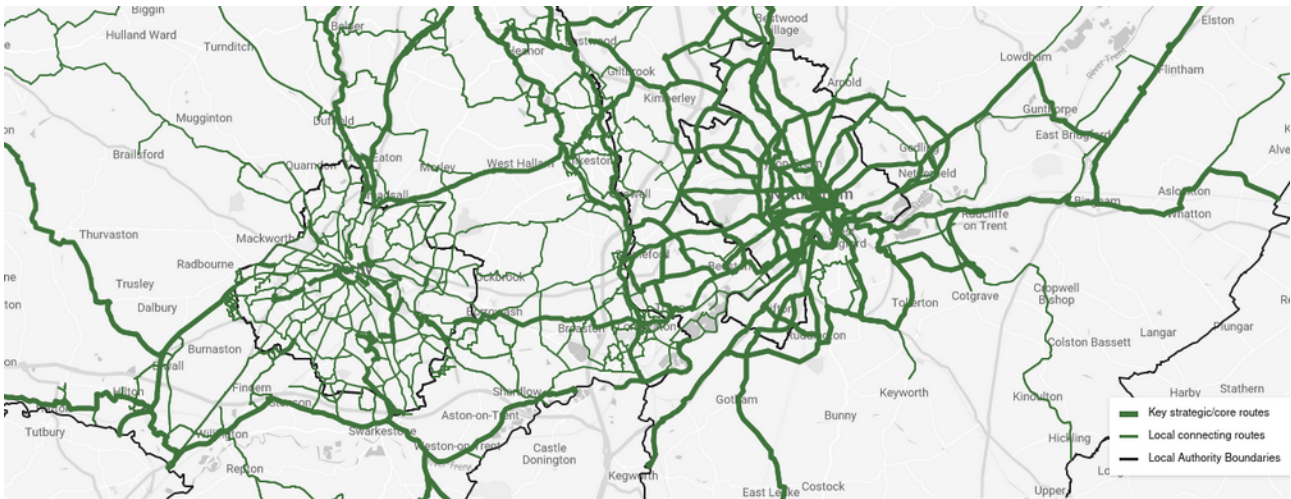


Figure 1: Segment of overall LCWIP network from Feedback page.

We believe the Derby City strategic routes need to be reassessed and important ones from Derbyshire need to be mirrored within the Derby City area.

Section 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.

Recognition of commuting demand from beyond Derby City

The approach taken within the LCWIP process to assess commuting demand is to consider only commuting journeys within a short distance of 200m either side of any proposed route. This is a reasonable approach within an urban area where there are many possible choices of routes but does not apply so well in the wider Travel to Work area.

In particular, the geography of the Derwent Valley (thin river valley in north-south direction) with travel routes running along the valley (rail, A6 road, proposed Derwent Valley Cycleway) means there is little alternative to travel along the valley. Residents living within easy reach of the valley (e.g. in Duffield, Milford and Belper) tend to travel directly from their residence into the valley and then along the valley to Derby and onwards. See Figure 2 for the PCT analysis of the area of the Derwent Valley for an example. This shows that travel will tend to be along a few key corridors.

Thus considering only those residents within 200m of a proposed cycle route (i.e. the river valley) will wrongly omit a lot of demand from residents within towns and villages along the valley but outside the 200m buffer.

We suggest that the 200m approach is not applicable within obviously constrained travel corridors and an alternative analysis approach needs to be taken that also incorporates the demand from potential cyclists living further than 200m from the proposed route.

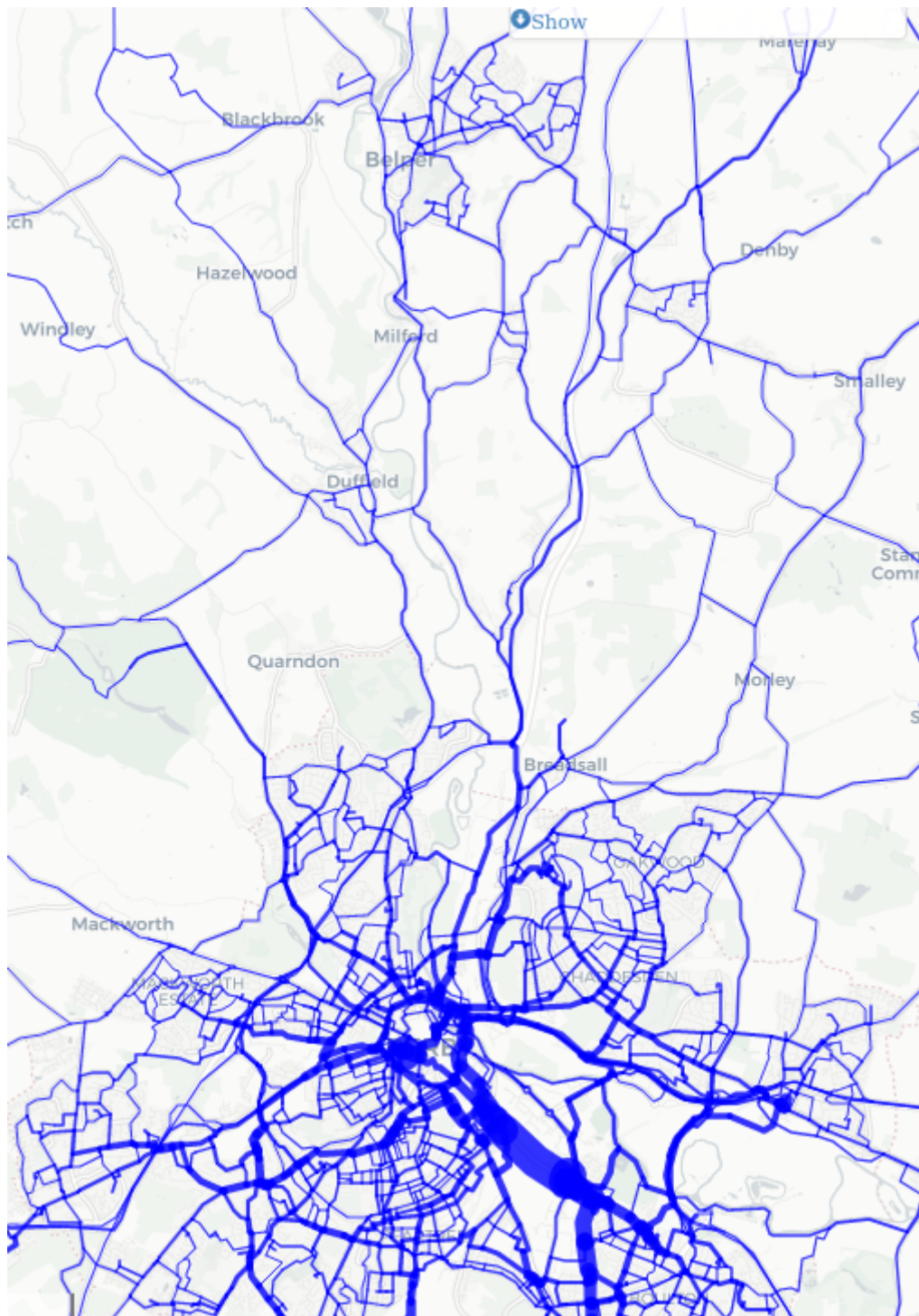


Figure 2: PCT output for commuting to Derby from the north

Time taken to finalise the LCWIP

It is disappointing that the LCWIP 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)”).

Most of the consideration of possible routes, analysis of their benefits and prioritisation has been done prior to 2020. Since 2020 there have been a number of significant changes to the local area which would affect the expected demand for the routes considered. There are also plans for additional demand drivers that did not exist in 2019.

A periodic review process is described (about every 5 years). 1.3.3 states it “will be regularly reviewed”.

The delays in finalising the LCWIP mean that it is now approaching the time for reviewing the contents and for repeating the identification, analysis and prioritisation process taking account of changes in the area over the prior time period.

Furthermore the Derbyshire section of the LCWIP is based almost entirely on the Key Cycle Network which was approved by the Derbyshire County Council cabinet in 2020 and is thus due for review.

We would suggest that a timetable for the creation of a second version of the LCWIP be agreed and for the updated LCWIP to be in place prior to the end of the 4-5 year review cycle as measured from when the current version was finalised (2019 or 2020) – i.e. completion of version 2 by 2024.

The Derwent Valley Trust should be included as a stakeholder when creating the next version of the LCWIP.

Section 8.2 should also be considering the Derbyshire Cycling Plan ambition to be the “most connected county for cycling in England, recognised as a world class cycling destination for all by 2030” and include objectives to support this goal. The Derbyshire Cycling Plan is mentioned on Page 154.

Demand Data

The analysis is based on demand data for commuting from the 2011 census information and will need to be updated as soon as the 2021 census data is released.

The Propensity to Cycle Tool now includes school commuting data and this should be included in the assessment of potential routes. See Figure 3 for the area between Derby and Belper. This shows the importance of providing cycle routes to allow cycle travel to secondary schools and further demonstrates the importance of the key travel corridors.

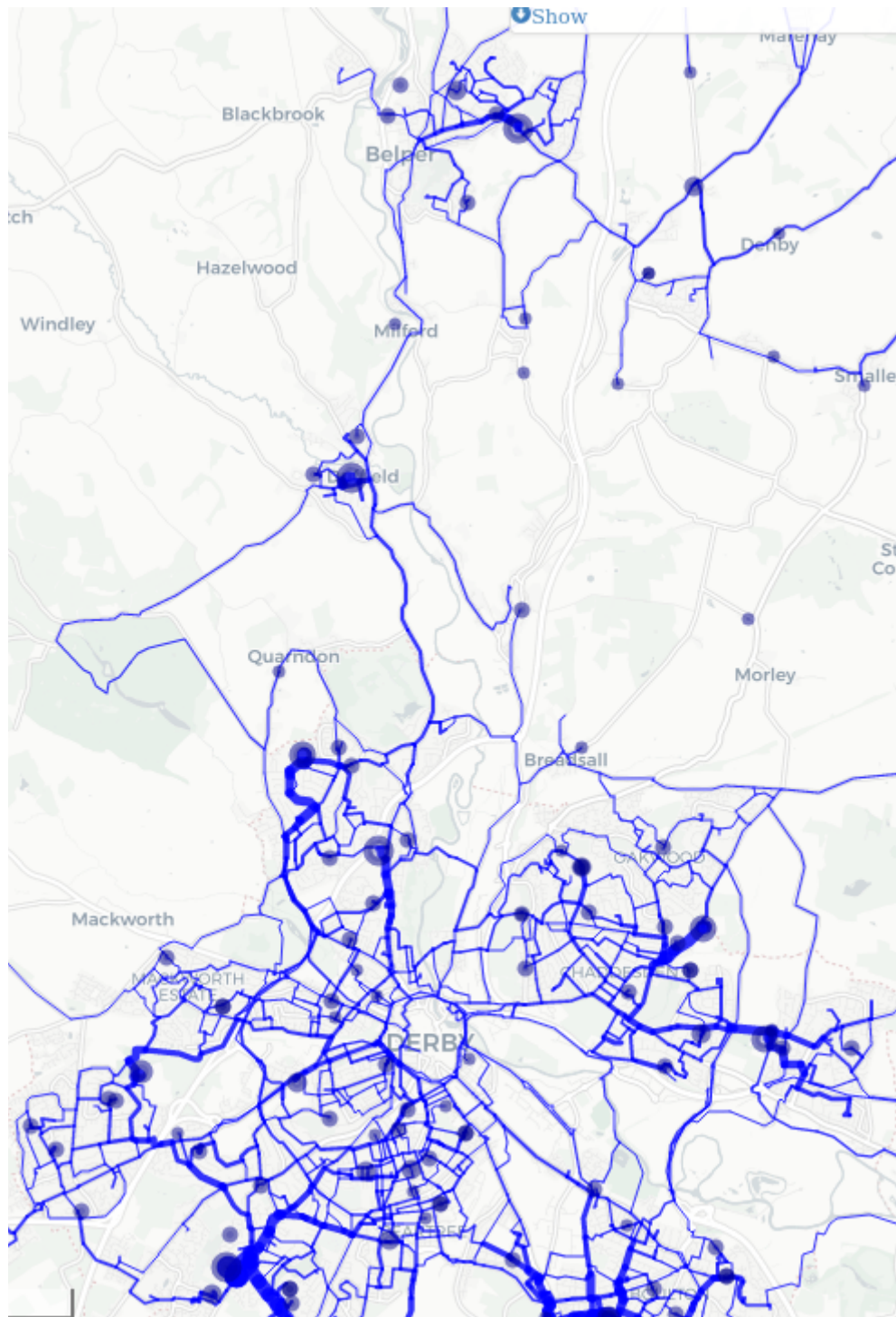


Figure 3: PCT school data for Derby and northwards

Prioritisation

At section 4.3 the process of prioritising the routes with the most benefits makes sense. However, the actual priority routes included in the plans seem to have been selected as either being easier to implement or ones that the relevant Council already have in progress. The plan should be identifying the most important routes and the implementation plan can then consider “deliverability”. For example the Great Northern Greenway to Ilkeston and the Little Eaton Branch Line projects offer some benefits, are relatively easy to deliver as they follow old railway lines but are probably not the most important or highest scoring routes considered in the LCWIP. Linking

Belper to Derby is important and would offer a lot of benefits but is not best delivered via Ilkeston or Ripley.

HS2 Connectivity projects are no longer required with the cancellation of the HS2 hub at Toton so require re-analysis for those routes scored highly for HS2 connectivity.

At section 4.4 a further key strength is the onward connection to the Derwent Valley World Heritage Site (similar distance to Sherwood Forest and Peak Park).

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

The results of the LCWIP process match directly onto the Derbyshire Key Cycle Network results. While there is overlap in the analysis process for each study, the processes are not identical. Hence, the approach of defining and prioritising the key routes explained in the LCWIP does not seem to have been applied. Instead the Key Cycle Network approach has been used for the Derbyshire routes.

The scoring methodology used in the Key Cycle Network (and seemingly carried over to the LCWIP) gives a significant negative score in the prioritisation for any route that runs through or nearby to particular heritage sites (e.g. nature reserves, the World Heritage Site, ancient monuments, etc.). In practice, the ability to provide a cycle route to allow people to access the heritage sites should be treated as a positive.

The example of the Monsal Trail (and others within Derbyshire) demonstrates how the cycle route can become a destination in its own right with tourists visiting the area (and providing economic benefits) purely to experience the cycle route. Similar prospective iconic cycle routes in the area should be treated in a similar way to the Monsal Trail when assessing the prioritisation and benefits of creating the routes.

The prioritisation process should incorporate these benefits in assessing routes nearby or through heritage assets and “score” potential routes positively.

Derwent Valley Mills UNESCO World Heritage Site

The Derwent Valley Mills World Heritage Site (WHS) is the only World Heritage Site within the East Midlands and one of only 20 within England. While the LCWIP acknowledges the Site and makes some allowance for the Site being a tourist attraction, it doesn't receive the level of tourism benefits that the UNESCO World designation warrants.

The Site is approximately 15 miles from Matlock to Derby which is a size eminently suitable for providing cycle infrastructure for travel within the Site.

Of the 20 English World Heritage Sites the Derwent Valley Mills is the only one without any significant cycle infrastructure with only some National Cycle Network routes in the Derby area and one northwards from Matlock towards Rowsley. The High Peak Trail joins the WHS at High Peak Junction but there are no cycle routes between Matlock and Darley Abbey (at the Derby City boundary). In addition, the geography and the lack of alternative routes to the A6 means that quiet

The World Heritage Site management plan includes the provision of a cycle route between the WHS attractions as one of its goals and the LCWIP should support the achievement of this goal.

Implementation

7.1.4 states that routes will accommodate horse riding. This can be a goal but should not be a requirement within a cycling and walking plan particularly as the inclusion of horse riding requirements can make the cycle and walking route infeasible.

7.1.5 also needs to take note of relevant standards and the geographic location – for instance unbound surfaces are not appropriate for areas subject to flooding (e.g. the Riverside Path east of Derby).