National Infrastructure Planning  
Temple Quay House  
Temple Quay  
Bristol BS1 6PN

5 November 2019

Dear ...........

**A38 Derby Junctions Scheme - Written Representation from intu Derby**

The following response provides a summary of intu Derby's views and comments on Highways England’s DCO application for the A38 Derby Junctions scheme.

**Introduction**

intu Derby sits at the heart of Derby city centre and is a major contributor to local economy – in 2018, our centre contributed £289.6 million to the local economy and supported 8063 jobs, representing 4% per cent of all jobs in the local area.

Regarding modal splits to our centre, around 50% of staff travel by car and a further 30% by bus, with similar figures of 56% and 26% for our visitor base - this means we are particularly reliant upon the local road network for access by both modes of travel. We are very aware how Derby’s road network can become congested very quickly - an incident on one side of the city can rapidly cause a ‘domino effect’ and negatively impact on traffic levels in other parts of the city.

**Our views on, and concerns of, the A38 scheme**

We acknowledge the importance of the A38 both for local journeys and for strategic trips between Birmingham, Derby and the M1 at Junction 28, so very much welcome this significant investment into the East Midlands region. Being conscious of the pressing need for these improvements to help address congestion and delays at the three existing roundabout junctions on the A38, we do support the overall aims and longer-term intentions of the scheme, if delivered correctly.

Nevertheless, whilst recognising the benefits the A38 Derby Junctions scheme will bring once complete and fully operational, there is a real concern around the traffic impacts which will arise during the construction period. Related to this, whilst the A52 upgrade is not a Highways England managed scheme, the issues surrounding the A52 programme over-run, increased budget and general disruption brought on the city means Derby’s residents and workforce are suffering from what can best be described as ‘roadworks fatigue’.
Coupled with other smaller-scale roadworks schemes running in parallel to the A52 works, we know of local businesses who are now struggling to cope with the overall level of disruption; we therefore seek reassurance all other major road schemes in the surrounding region which are currently underway e.g. the M1, M42/A42, A52 upgrades will have been completed prior to the A38 works commencing. These existing negative perceptions of ongoing roadworks means Highways England simply cannot allow the likely future impacts of the A38 works to be further compounded by overrunning of other existing schemes on the network. In this respect, the Construction Traffic Management Plan lacks detail on how the A38 works will be co-ordinated with other highways works in and around the city, in order that impacts on road users are minimised.

Discussions with our own staff and retailers have revealed understandable concerns over the inevitable disruption and delays to both visitors and staff resulting from the construction works, as the A38 is a key route to/from, and bypassing, Derby. During the scheme, entering and exiting Derby from the north west and west is going to be difficult, resulting in severance for large parts of our catchment area – the works at Markeaton Island will impact upon customers from Mackworth, the A52 corridors towards Ashbourne and the southern Peak District, whilst the Little Eaton works will affect customers from our northern catchment areas.

**Management of the programme**

We are concerned there is no flexibility in the Traffic Management Plan; it may be the best way of maintaining traffic flow on the A38(T), however this could be at the expense of more delays and traffic on Derby's local network. There is uncertainty over the knock-on effects of the A38 works on the local road network, as traffic which would normally use the A38 finds alternative routes to avoid the roadworks. There is danger this could result in gridlock, especially given the city's road network is already at capacity during peaks times and, as mentioned, one small incident can have a worrying domino effect for the entire region.

It is noted that the Traffic Management Plan will be refined at each subsequent stage of the scheme's development, and the next major revision would be in Stage 5 “Construction Preparation” at which time the project's construction methods and programmes would be developed in more detail - intu Derby would seek to be engaged during this process.

In planning the construction programme, we urge a realistic level of contingency be included; our experience elsewhere and indeed locally (e.g. A52 Wyvern Way slip roads) shows works of such a complex nature tend to over run, which then generates further negative press and is difficult for our retailers to plan their operations to a satisfactory level.

Wherever possible, elements of the scheme with the most significant impact on road users should be planned so they do not coincide with peak trading times (e.g. Christmas). Options to undertake overnight works on the live highway should be explored to reduce the impacts on existing road users but we would request any road closures are advertised as beginning at 2100, if not later, subject to the scheduling requirements for mobilising/demobilising plant and personnel.
Stakeholder engagement and communications

The construction of the A38 Derby Junctions scheme will inevitably be a challenging period for Derby. As such, communication and flexibility will be key to managing the movement of traffic through and around the city. Together with other key stakeholders, intu Derby are a member of the Local Travel Behaviour Change group; it is requested that Highways England or the contractor appoints a communications officer, ideally to be based in Derby itself, to work closely with this group to develop a comprehensive communications plan.

Previous highways schemes have resulted in a prolonged period of reduced footfall as customers avoid travelling to our centres whilst works were underway - managing the ‘perception versus reality’ situation is critical to ensuring any temporary reduction in footfall does not become permanent. Whilst an effective communications plan can help to minimise these impacts, it may also be necessary for Highways England to fund a series of mitigating works on the local road network and to support alternative transport options, thus ensuring the travelling public can access Derby throughout the construction period.

Ultimately, we are anxious the proposed A38 works, whilst necessary, will further enhance the current perception Derby is difficult to access by road, and so our customers will choose to go elsewhere, with the inevitable economic impacts for both intu Derby and the wider Derby economy. Prior to the construction period, Highway England’s communications team must engage with the local media to project a positive message about the works from the outset, so customers will understand Derby is still ‘open for business’ and accessible whilst the A38 works are underway.

Conclusion

In summary, intu Derby fully recognise and appreciate the need to undertake these works on the A38 and we do acknowledge the longer-term benefits the scheme will bring to the East Midlands region.

Given the existing issues relating to the A52 scheme and that the city is suffering from ‘roadwork fatigue’, the perception and timing of the A38 works is something that must be managed carefully to minimise any possible further economic disbenefits for Derby.

We would welcome an opportunity to develop a mutually beneficial working relationship with both Highways England and their contractors, helping to see the scheme delivered through a strong collaborative approach which is sympathetic to the impact on local businesses and residents alike.

Kind regards,

Nigel Wheatley
Centre Director.

intu properties plc
40 Broadway London SW1H 0BT
T +44 (0)20 7887 4220 F +44 (0)20 78870002
intugroup.co.uk