

From: David Clasby [REDACTED]
Sent: 17 December 2019 22:12
To: A38 Derby Junctions <A38DerbyJunctions@planninginspectorate.gov.uk>; Peter Robinson [REDACTED] Tony Roelich [REDACTED]
Subject: A38 Junctions objection

I wish to object to the A38 junction scheme going ahead in any form.

I believe that the scheme is not justified on traffic grounds. Analysis of traffic data by Derby Cycling Group DCG has shown that the majority of the traffic is local journeys. (See separate submission from DCG) The money would be better spent on improvements to walking, cycling and public transport facilities in the city. This could remove much of the local traffic. There would then be no need for these changes.

There is absolutely no justification in increasing the traffic speed to 50mph. This will merely increase fuel consumption and air pollution. Motorways are major sources of air pollution. Please see DEFRA's air quality models. The Derbyshire air quality heat map clearly shows that it is faster roads that have the worst air quality. 1

The proposed increase to three lanes between Kedleston Road and Kingsway roundabout will see an increase in traffic usage. When will the increased speed and volume of traffic lead to the air quality going back to what it is now? I am told the models do not predict that within 5 years but it will certainly happen eventually. There is no sign of the mass increase in electric cars, in fact SUV's are increasing significantly in sales which emit more air pollution than standard family cars. 2

The scheme will have a detrimental affect on air quality in the city during construction. This is because the road width will be restricted to one lane for most of the time. The congestion this will cause will mean drivers will seek other ways to make their local journeys which means an increase in motorised vehicles on the city streets. This will increase the poor air quality in Derby. Then combine with the changes to the inner ring road due in 2020 which will change the inner ring road from Stafford St to Uttoxeter Old Road. This will see NOx levels in the city become illegal once again. Levels are already very close to illegal across a lot of the city. This scheme will lead to illegal levels of NOx in Derby during construction.3

The monitoring of air quality in the city is not as accurate as it could be and carried out almost exclusively using diffusion tubes which have an accuracy rating of about +/- 20%. 4

The evidence is piling up as to the damage to people's health of poor air quality. This will make it even worse and affect the poorest who live closest to the busy main roads the hardest. This does not seem fair. 5

The changes to the roundabouts, the increase in the number of lanes and the speed limit increase will actually induce extra demand. Induced demand is a well known phenomenon. More roads, better roads merely mean that more people drive more often. We can not build our way out of this problem. a recent report for the government concluded "a 10% increase in road capacity could lead to 2% induced demand on the network." 6

The construction will have a detrimental affect on a huge number of businesses and organisations. The University of Derby will see their front door become a building site for 3/4 years. This will put students off from applying, it will put staff off from joining. Students who can currently use the car park at Markeaton Park as an over spill park and ride will find themselves caught up in the A38

congestion. Markeaton Park will effectively be cut off a lot of the time. So will the estate of Mackworth. Visiting students will instead park in local streets around the University. This will make traffic, parking and air quality far worse for local residents. The shuttle bus which runs between the Kedleston Road and Markeaton St campus will get caught up in the congestion and be less reliable. The Derby Royal Hospital are very concerned on the impact to ambulance times and also the ability of staff and visitors to get to the main site. This could have a serious impact on lives. Testimony from UoD and hospital managers.

The construction will have a huge impact on local public transport services, bus times and local bus company revenues. Having spoken to people close to the bus companies I know they are very worried and also deeply concerned by the lack of meaningful engagement.

There will be significant impact on people getting to work across the city and a knock on as to whether businesses locate to Derby. There will be a loss of trade as people chose to go elsewhere.

There is no plan for how to mitigate the scheme that has been shared with the local community. I should know. I am part of the local community. I sit on Darley Ward Neighbourhood Board, I sit on the transport sub group, I am a member of the University community liaison group, I run the West End Community Centre on Mackworth Road, I run my local residents group The Victoria Streets. We have had the initial consultation on the scheme but nothing around how to mitigate the worst of the chaos that is going happen once the scheme is under construction. We might just have some good ideas on mitigation and at the very least want to be kept informed but so far nothing. Time is running out to put some mitigations in place before construction starts. That is just not acceptable from Highways England, Derby City Council or the contractors.

My final point will be made by many. The gross carbon emitted by the construction of this alone can not be justified on any level if we want to have a planet habitable for future generations. The Tyndall Centre in a BEIS funded study have forecast for Derby 'At 2017 CO2 emission levels, Derby would use this entire budget within 7 years from 2020.'⁷

We simply can not carry on with business as usual. This is yesterdays's solution, our children's future demands a different and better solution. Invest in low carbon and zero carbon.

This scheme will impact directly on my families and my communities health because I am a local resident to the scheme. The scheme will also contribute significantly to this countries carbon emissions. This will have a huge impact on future generations. I mostly strongly object to this and other similar such schemes. Our children demand better from us.

Thank you

David Clasby

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1 <https://www.derbyshire.gov.uk/site-elements/documents/pdf/council/meetings-decisions/meetings/improvement-scrutiny/places/28-11-2018-air-quality-in-derbyshire.pdf>

- 2 <https://www.bbc.co.uk/news/business-50713616> "Rise of SUVs 'makes mockery' of electric car push"
- 3 <https://www.derby.gov.uk/media/derbycitycouncil/contentassets/documents/environmentalprotection/derby-asr-2018.pdf>
- 4 https://www.cheshireeast.gov.uk/environment/environmental_health/local_air_quality/what_is_pollution_like_near_me/diffusion_tube_monitoring/diffusion_tube_monitoring.aspx
- 4 <https://laqm.defra.gov.uk/diffusion-tubes/precision.html#PrecVAcc>
- 5 <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution>
- 5 <https://airqualitynews.com/2019/06/19/poor-most-exposed-to-air-pollution-caused-by-rich-study-finds/>
- 5 https://uk-air.defra.gov.uk/assets/documents/reports/cat09/0701110944_AQinequalitiesFNL_AEAT_0506.pdf
- 6 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/762976/latest-evidence-on-induced-travel-demand-an-evidence-review.pdf
- 7 <https://carbonbudget.manchester.ac.uk/reports/E06000015/>
- 7 <https://www.tyndall.ac.uk/news/tyndall-carbon-targeter-helps-local-authorities-respond-their-climate-emergency>