

As with the climate emergency, HE appears to have been overtaken by events. The current and future coronavirus emergency takes precedent over saving a few minutes on vehicular journeys.

The growing impact of home-working, now finally being implemented and which will be continued for many years, swerves the outdated traffic forecasts and negates any perceived 'need' for the schemes. We ask the Secretary of State to consider the beneficial effects of £227 million (estimated cost of the schemes) being transferred to the National Health Service.

We disagree completely with all of HE responses, outdated forecasts, claimed flood risk estimates, oft-repeated claims of sustainability and consider that HE is insulting Derby people living in the polluted, deprived city wards lacking in public open space, 'remote from the scheme', who frequent Markeaton Park and whose health benefits are ignored, during the 'consideration' of this scheme.

Over 100 current trees/scrubland/hedges provide a valuable buffer zone, oxygen and absorption of air pollution; the benefits of which have not been considered, at all, especially to vehicle drivers and 'driver stress'.

500 tiny replacement saplings will drown, in future increased rainfall events. Before they drown, they will be unable to absorb as much carbon/water/pollution, as the current tree cover.

Q38 HE keep stating, throughout responses, that carbon emissions are 'not deemed to be significant in context of current carbon budgets', they must be writing this in each of the supporting documents for the other 100 UK road schemes, whilst omitting to mention the cumulative effects of over 100 UK road schemes. What is the total CO2 tonnage for all of these? (NB include the CO2 and methane tonnages from uncapping Kingsway landfill)

Q39 There are large disconnects between various HE claims. For example, in responses to Derby Friends of the Earth (REP6-035, Vol 18.84) the following statements are made, re Stafford St "With operation of the scheme, improvements in air quality are also expected in Stafford St" and "operation of the scheme is also expected to reduce traffic flows in Stafford St and this will be beneficial for air quality"

However, answering Q24 (REP6-025) "as detailed in ES para. 5.10.62 of ES Chapter 5: Air Quality [APP-043], reduced NOx and PM10 emissions are expected in 2024 both with and **without** the Scheme as compared with the baseline (2015)." HE 8.86 Supplement to Air Quality Assessment Risk, Table 1 clearly shows NO2 limit value exceedances (see also National Friends of the Earth evidence, pg 4, Derby Friends of the Earth HE Response, 3 A38)

Q40 "Traffic flows on the A38 will increase slightly" At the Feb 18th inquiry, on oral tapes HE clearly states an extra 15000 vehicles daily onto the A38. How is that a 'slight increase'? (NB in REP 6-027 DciC details the 1000s of extra induced car journeys on other roads, impacted by the A38 schemes. There is no indication of the ensuing pollution, on those roads)

Q41 There are no pedestrian surveys for Mackworth Rd. Re saving a predicted 1,396 personal injury collisions over a period of 60 years, was such an estimate also made for the A6 Bypass inquiry, after which the constructed A6 bypass traffic killed a boy, so that just 28 seconds of car journey times could be saved?

Q42 In response to FOE (REP6 035, Vol 18.84) re Stafford St "NO2 concentrations will be within the limit value both with and **WITHOUT** the scheme" Therefore, there is no clear benefit of the scheme

Q43 Biodiversity – 'mitigation' claims take no account of the destruction being wrought by cumulative schemes such as HS2 and over 100 planned UK road schemes. The 'adverse effect' on the Kingsway roundabout LWS, is the complete loss of the wildlife site. The impacts on Markeaton Park and Little Eaton biodiversity are staggering and the many sites and species to be destroyed, or habitat to be ruined, cannot be replaced. This is acknowledged and the extinction of many species is further hastened by such schemes. Amongst other species, the park is now a confirmed otter habitat. Otters were also seen in the city centre, at the back of the council house, until unsustainable development on the riverbanks drove them away.

Yet the UK Government has signed the Global Convention on Biodiversity Directive. See State of Nature 2016 <https://www.rspb.org.uk/globalassets/downloads/documents/conservation-projects/state-of-nature/state-of-nature-uk-report-2016.pdf>

Q44. HE response to FOE Q2 – HE seems unable to understand why human rights should be taken into consideration, or are relevant to the scheme. It clearly states in the Paris Agreement that "**States have human rights obligations that are relevant to climate change; Parties should respect, promote, and consider**

those obligations when taking actions to address it; the relevant rights include the right to health, the right to development, and gender equality, and also the rights of those who are most at risk from the effects of climate change; and additional considerations such as intergenerational equity are also relevant.” and “Climate change is a common concern of humankind, parties should consider respective obligations on **human rights, the right to health,...of indigenous peoples, local communities, migrants, children, persons with disabilities and people in vulnerable situations and the right to development, as well as gender equality, empowerment of women and intergenerational equity'**

Does HE consider, in the context of the above and Paris Agreement, that human rights are relevant to the schemes?

(see also Q28 3 A38 Markeaton/Kingsway Derby Friends of the Earth)

Q45 HE response to FoE – HE did not answer as to whether HE believed there was a climate emergency, or not. Does HE believe there is?

Q46 HE response to Q13 – HE has acknowledged that traffic and pollution will be increased with the schemes. “emissions overall would increase” As the full account of the effects of HE schemes - on other roads with induced traffic, for example - have not been evaluated, how can HE claim a 'long term and sustainable benefit to the environment'?

Q47 HE response to Q16 -Proposals at Kingsway Junction include wetland habitats, Have calculations been made as to how much methane from the uncapped Kingsway landfill, will be emitted through the water?

Q48 HE response to Q18 – Have the scheme effects on water quality taken account of the increased pollution from uncapping Kingway landfill run-off ? See also FOE Q31, Q32,Q33,Q34; 3 A38

Q49 HE response to Q18 – 'Scheme would have a 'neutral effect on surface water quality” yet the PEIR (Human Health Risk Assessment 9.5.32) clearly states a risk from chromium hexavalent, copper, cyanide, lead, nickel, zinc and ammoniacal nitrogen at Kingsway Junction. How can this be a 'neutral effect'?

Q50 HE response to Q19 – The response does not make sense as it is illogical to claim that there will be a betterment, or mitigation, when, for example, the replacement 'mitigation' saplings will not carry out the same functions, produce as much oxygen, absorb as much carbon, alleviate pollution/particulates, or absorb as much rain/floodwater, as the trees/environment to be destroyed. HE has stated that the scheme would impact on flood storage and result in the loss of some River Derwent floodplain. As both HE and EA have previously been wrong about climate change - storms in Nov19, Jan and Feb 20 and HE statement on the impacts on roads, of increased rainfall/climate change - and Government guidance on this is to be revised shortly, how can HE claim that 'the scheme will not increase flood risk'?

Q51 HE response to REP6 – 036 HE claims 'resilience against both **gradual** climate change and the risks associated with an increased frequency of severe weather events' The 40-50% increased rainfall events catered for, are too low (see previous Qs) and the Environment Agency statement about the February 141% rainfall event being 141% higher than average February rainfall was clear, their own responses belie the above claim;

**(REP4 10 pg 4) 4.5.6 “The risk of groundwater flooding is considered to be high.”**

**4.10 The risk of increased surface water run-off, from the scheme, to surrounding areas, is considered to be high”**

HE claims '**gradual** climate change' despite the recent UK storms and increasing rainfall, showing that tipping point has already been passed. Can HE demonstrate that HE is not a climate denier?