

From: [Gareth Evans](#)
To: [A38 Derby Junctions](#)
Cc: [Adam Tamsett](#); [Emma Taylor](#)
Subject: A38 Derby Junctions Scheme, Deadline 11 - intu Derby
Date: 23 April 2020 17:08:48
Attachments: [TR010022-001267-A38 Derby Junctions Table for Rule 17 Request dated 21 April 2020 FINAL - intu Derby.pdf](#)
[A38 Derby Junctions Written Representation from intu Derby part 3 230420.pdf](#)

Dear Bart,

As per the latest information for Deadline 11 published online this week, and based on previous dialogue around this matter, please find attached on behalf of intu Derby:

- Written response relating to Highway England's Traffic Management Plan [REP7-003]
- Our completed form regards attendance/participation at any future Hearings via digital means

We'll await information on the next steps as set out in the latest timetable, noting the Hearings are to take place in June should these be required by the ExA.

Kind regards,

Gareth

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23rd April 2020

Dear Sirs,

A38 Derby Junctions Scheme – Further Written Representation from intu Derby (Deadline 11)

This response provides further comments and insights on behalf of intu Derby regarding Highways England's (HE) DCO application for the A38 Derby Junctions scheme. This follows on from our previous written submissions and attendance at Hearings. At this juncture, we seek to specifically address the following question raised by The Examining Authority (ExA):

“Are there any further comments or outstanding concerns regarding the Traffic Management Plan [REP7-003]? How should any outstanding concerns be addressed?”

This question was directed to the Behaviour Change Working Group (BCWG), of which intu Derby is a member.

Our previous written responses provide more detail with regards to wider concerns around the construction impacts of the A38 Derby Junctions scheme and seeking to maintaining access/egress to/from Derby city centre throughout this period. We therefore wish to take this opportunity to highlight our key concerns to the ExA associated with the Traffic Management Plan (TMP):

- **Confirmation of funding for mitigation measures** – Through our attendance at BCWG meetings, we have been disappointed to learn from HE representatives that, to date, there has been no allocation of HE funding for mitigation measures, specifically for those on the local network which could also deliver a lasting legacy beyond the A38 scheme itself. Our understanding is the current TMP only allows for a package of comms-based Travel Demand Management (TDM) measures, issues around which are discussed separately at the end of this list, unless other sources of funding can be identified locally or secured through bids for additional HE funds.
 - We would therefore ask the A38 Derby Junctions scheme is not consented until the HE commits to sourcing and allocating appropriate funds to enable measures to support access/egress to/from Derby city centre during the construction period, for example Park and Ride sites, bus priority measures etc., as was previously identified by other BCWG members in earlier meetings with DCiC/AECOM.
- **Congestion hotspots during the construction period** – The TMP states further junction modelling will be undertaken during construction preparation (Stage 5). This modelling needs to be undertaken at the earliest instance so that problem areas can be identified with sufficient time to subsequently develop and implement suitable mitigation measures in advance of the works commencing.

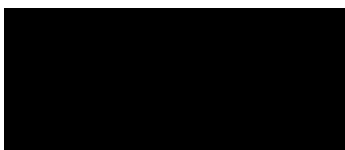
- **Clarity of diversionary routes per phase** – Consideration must be given to the scale of impact on the local network plus appropriate mitigation measures for links/junctions which are likely to be used by re-routed traffic as well as those routes directly affected by the construction works. From the technical drawings presented at previous BCWG meetings and being able to compare these to graphical output provided to intu by other roadwork schemes, we strongly encourage the HE seek to produce a series of clear and concise diversionary diagrams to illustrate the traffic restrictions during each phase of the works.
- **Timings** – We, and other BCWG members, continued to be frustrated by the lack of progress made in either defining and agreeing proposed mitigation measures, or giving confirmation these will not actually be possible. We do acknowledge the disruptive impact COVID-19 has had on the DCO process and appreciate all efforts to continue planning and discussions; nevertheless, there is increasingly limited time remaining for HE to develop, confirm and implement an effective package of measures in advance of any works commencing on site.
- **Contingency** – It is still not clear from the TMP exactly what level of contingency, if any, has been considered for the programme. Clarity on this matter would be welcomed – as noted before, our experience from other major road schemes has shown this element tends to be under-estimated and just one significant, unexpected issue can easily consume all/any planned contingency, leading to programme overrun and negative media coverage.
- **TDM proposals** – at the March 2020 BCWG meeting, HE presented their TDM strategy, as proven by previous schemes, including the 4 R's (Retime, Remode, Reduce and Reroute). From a retail perspective, we can only promote options to **Remode** and **Reroute** journeys and would discourage any efforts which could **Reduce** shopping/leisure trips at a time when the wider retail sector cannot sustain a further decrease in footfall. The option to **Retime** is also unlikely to be acceptable given the need for retailers to be open for trade at specific times. To enable successful Remode and Reroute choices, there needs to be agreed alternatives which are attractive to users and fully operational prior to the works commencing.

Conclusion

As mentioned in all our previous correspondence, we welcome this investment by HE into the East Midlands region and appreciate this opportunity to raise further concerns with the ExA.

To reiterate our stance – if the A38 Derby Junctions scheme proceeds, intu's aim is to support delivery of the programme by working with all organisations across the city in developing a mutually beneficial working relationship with both HE and their contractors. Taking a collaborative approach will be key in ensuring HE can successfully undertake these works without them being overly disruptive to Derby and the wider region, and we trust our concerns set out in this written response will be addressed accordingly.

Kind regards,



Adam Tamsett
General Manager, intu Derby