

## ISH6 Hearing submission

### Land use, social and economic Impact

#### Our submission

I would like to express concern over some of the statements that HE has made regarding Option Generation of this scheme. They stated in REP7-007 that “Given that the TAG assessment was used to prioritise between feasible road projects then the implied bias is not the issue. If the A38 Derby Junctions had not been selected in RIS1, then another road improvement scheme would have been selected in its place.”

This indicates categorically that no non-road options were considered. It was just a cost to benefit ratio-based decision process to pick which road schemes should benefit from the DfT’s RIS1 road spending budget.

Then in REP10-009 HE says “At stage 1, development of options was focused on resolving the problem of long delay to journeys on the road network. The solutions are necessarily road-based options.” May I ask Stage 1 of what and by whom? Where is the documentation for this?

They go on to say, “Over the years, transport interventions using other transport modes have been examined by the local authority.” Here they cite many things that the local authority has looked at which are obviously not part of an Option Generation appraisal related to congestion problems on the A38: -

- **Park and Ride schemes** – the 2 that have been implemented are nowhere near the A38
- **bus infrastructure improvements** – this was a new bus station - necessary due to the state of the old one.
- **cycling improvement schemes (e.g. Cycle Derby initiatives)** – this is a minimal investment scheme, involving no new infrastructure, that pays lip service to any serious attempt to attract people to ride bicycles in Derby

They go on to cite other things that have been considered over the years which similarly have nothing much to do with this scheme: -

- **Derbyshire County Council are supporting the enhancement of cycle routes (e.g. along the Derwent Valley)** – That is not relevant to A38 scheme as that relates to the A6 junction which is not part of this scheme.
- **Network Rail/Midlands Mainline recently upgraded Derby station and reconfigured the tracks to the south of the station to improve journey times.** Not particularly relevant – this may have resulted in seconds being taken off rail journeys but won’t have been enough to change behaviour – more frequent services, less over-crowding and cheaper fares would have more effect – have they been considered?

- **The recent Budget 2020 announced support for a new cycle route to East Midlands Airport** - Yet another example that has no bearing on traffic on the A38 – East Midlands Airport is south/south east of Derby.
- **The only scheme that they cite that could be relevant is the £161M to develop a new electric Rapid Transit Route, but I suspect that is also going to be the other side of Derby.**

It seems to me that HE have picked any transport related project that has happened or is proposed to happen in the area and are using them as evidence to show that there has been some joined up Option Generation appraisal of the need for this scheme. This is obviously not the case.

In REP12-007, when asked by the EA to explain how non-road-based options were considered when the A38 Derby Junctions was appraised using the TAG guidance, they firstly claim that “Other transport options, which might be an alternative to a road-based intervention and deliver the same level of objectives, were considered at stage 2 in the appraisal process but were identified as not being affordable.” Stage 2 of what and by whom? Evidence of this please. (Remember that in REP7-007 they stated that “Given that the TAG assessment was used to prioritise between feasible road projects”.)

But then they repeat their previous assertion that ‘the Scheme is being delivered on the basis of a road based study, that focussed on the options available to Highways England as the Strategic Highway Authority responsible for maintaining and improving the strategic road network.’

In trying to show that there has been some joined-up appraisal of Option Generation they again cite a collection of schemes that have been looked at over recent years: -

- **A rail-based option that would compete for intermediate-length journeys along the line of the A38 would be prohibitively expensive. Such an option might take the form of a rail improvement between Sheffield and Burton-on-Trent and might require improvements to the existing railway, which passes through Derby station.**  
– HE has already stated that the improvements have been made to Derby station. Surely simple increases in services or fare adjustments should have been considered. The proper integration of public transport services in the city would also encourage modal changes.
- **An alternative alignment for HS2 was also considered between Birmingham and Leeds that passed through Derby station, but this option was dropped in favour of the preferred alignment via Toton station near Long Eaton.** I am convinced that this decision will not have been part of any appraisal of the A38 problems.
- **Other modes, such as bus-based park and ride interventions, might serve commuting and leisure trips on Derby’s radial corridors but these would not replace trips on the A38 which is an orbital route of the city and is serving inter-urban**

**journeys of intermediate and long-distance lengths made by private transport.** – the wording ‘might serve’ indicates that this is current thinking - not something that was considered at the time of this road proposal. I would also like to suggest that if these options had been considered in depth at the time the possible decrease in traffic crossing the A38 into and out of Derby may have solved the congestion problems by significantly reducing the total volume of traffic on the 3 roundabouts.

- **Improvements to existing rail services might be considered for their effectiveness in attracting intermediate-length journeys away from the A38; but it is noted that in 2017 the Secretary of State for Transport postponed a proposal to electrify the Midland Mainline railway on the grounds that it was unaffordable.** – again, the wording ‘might be considered’ suggests that this is recent thinking – not a considered appraisal at the time. I would also like to point out that decision was probably made purely on financial considerations without regard to the benefit to the climate and environment and to the costs of not going ahead – an indication of the priorities of the government. If the government understood the seriousness of the climate crisis, like with the Covid crisis, money would be no object. Can we afford to ignore it?

Finally, HE say **“The Scheme, as a road-based option was considered to be the most viable transport solution in this case, noting that it seeks to improve an existing infrastructure corridor.” I would like to know who made this considered decision and to see the evidence of the analysis behind this statement.**

### **In summary**

The initial assessment for this road scheme was back in 2002 and I am still not convinced that any proper appraisal was done then or any time since to consider other modes, infrastructure, regulation, pricing and other ways of influencing behaviour as alternative solutions. There is certainly no evidence that in the light of more recent responsibilities towards climate and ecology that there has been any appraisal review.

Regardless of the above arguments, I would strongly suggest that we find ourselves in a totally different world compared to when this scheme was first mooted.

We now find ourselves in a world where Covid 19 has forced us to change our behaviours. On 9<sup>th</sup> May 2020 Transport Secretary Grant Shapps promised a £250 million emergency active travel fund - the first stage of a £5 billion in new funding announced for cycling and buses in February. Councils are actively encouraged to use this money for Pop-up bike lanes with protected space for cycling, wider pavements, safer junctions, and cycle and bus-only corridors. Mr Shapps said, “We know cars will continue to remain vital for many, but as we look to the future, we must build a better country with greener travel habits, cleaner air and healthier communities.”

This is more like the DfT policies that we need if we are going to solve the climate and ecological crisis. But how does this sit alongside this proposal for a scheme which will encourage more cars onto the road, increase air pollution and carbon emissions and have a huge impact on local biodiversity.

This is not the time to be making a rash decision on a road scheme that will have such obvious negative impacts on the environment when it is now not even clear that it will be needed – it is quite possible that large numbers of road users will either start working from home long-term, start to use active transport methods or use the better public transport services promised by the government in February.

Government policies are changing rapidly and if our recovery from this current crisis is also used as a recovery for the larger climate and ecological crisis, then this proposed scheme is obsolete. At the very least it should be delayed until the ramifications of the Covid crisis are known.