

Friends of Markeaton Park comments on the Applicant's response 4th Feb.22

The responses to the Secretary of State's Letter have submitted some new material. That needs a thorough new Examination to determine whether or not the scheme will result in an increase in carbon emissions so significant that it would have a material impact on the ability of the Government to meet its carbon reduction targets.

The Covid pandemic has dramatically changed the traffic situation in Derby. Frail elderly people, who previously gladly used their Free Travel Passes on Public Transport, use their cars or taxis now, to avoid getting infected by the virus. The figures that National Highways supplied to the TRO10022 A38 3 junction scheme Public Examination no longer reveal the actual reality now.

The delay to building the scheme has not prevented the growth of Derby City, nearly all the sites identified as being available for new housing in the SHLAA maps have been built, that adds to the numbers of vehicles that need the Kingsway and Queensway sections (with which the A38 combined), to avoid going through the town centre has increased.

As Friends of Markeaton Park detailed in footnotes in a previous submission (REP15-011), the scheme as proposed breaches the National Policy National Network Strategy Law regarding Biodiversity. The current delay gives National Highways some time to commission new Environment Surveys.

National Highways claims these issues were discussed during the Examination. However there have been profound changes since the Examination closed.

At the COP Conference in Glasgow Boris Johnson signed an agreement to end the losses of trees. On the 19^h October 2021 the government announced it wants a Greenhouse Gas Removal programme using afforestation, forest management, and soil carbon sequestration. The A38 3 junctions scheme TR10022 features the destruction of all three of those existing types of Carbon stores.

The National Highways must reconsider the proposals in order to comply with the more stringent targets for reducing losses of Carbon storage habitats and Biodiversity.