

From: [REDACTED]
To: [A38 Derby Junctions](#)
Subject: For the attention of the A38 Derby Junctions Case Team
Date: 26 October 2021 22:21:33
Attachments: [A38 Junctions Oct 26 2021.doc](#)

Dear Sirs

Find attached continued A38 Derby Junctions objections, from Derby and South
Derbyshire Friends of the Earth
D Skrytek (co-ordinator)



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Dear Sirs,

As the inquiry has been re-opened, we reserve the right to send further objections.

The Secretary of States' Statement of Matters asks what has changed, since the inquiry ended.

The change of Highways Englands name, to National Highways (NH), has done nothing to change NH, still set on increasing traffic and air pollution, to the detriment of our environment, communities and carbon emissions targets. The Paris Agreement is now National Policy, but this still remains unrecognised by NH

It is impossible to carry out a detailed expose of NH evidence, without the missing floodmap. Pg 25 of their submission shows

Birmingham flood map instead. While

helpful to many people in Birmingham it does nothing for the people of Derby, who are at imminent floodrisk, from the River Derwent, which now floods every year.

NH has also consistently refused to answer questions about the total carbon emissions of over 100 RIS2 England road schemes.

Flooding guidance, from the Government, has changed

[REDACTED] the latest – regarding peak river flow allowances and dominant sources of flooding from catchments - was on 6th October 2021.

Derbys flood defences, though welcome in some quarters, are inadequate and merely allow floodwaters to affect communities in other areas, up and downstream of Derby. The release of floodwaters usually occurs at night, from the Derwent Dam. We have seen this year, what excessive rainfall and the subsequent release of floodwaters can do, across the world. Some of the worst effects were felt in Germany this summer, where over 150 people were killed, because of flooding. In September 2021 ONE METRE of rain fell, in NW Italy, in 24 hours. Henan province in China also suffered the same amount of rainfall, that month. Today, New York and New Jersey have declared a state of emergency as severe weather threatens, 70 million people are under threat of a powerful storm system, in Northeastern USA. The highest flash flooding alert has been made for Southern Italy. Floodwaters have forced 5000 from their homes in Central Vietnam. Winds expected to exceed 100km/ph in Argentina

Every country in the world has experienced changes and the worsening of rainfall and flooding events, this year. Yet NH's latest submission reveals that NH believes England to be somehow immune from such climatic disasters.

National Highways do not address any aspects of the correlating human rights issues re the Paris Agreement effects on vulnerable communities, dispossessed, women, children, migrants. Applied to Derby, the communities who also most utilise the park, from the poorer, most polluted wards of Derby, have been totally ignored. NH dismisses the intent of the Paris Agreement, entirely.

At Raynesway Rolls Royce nuclear reactor, 200 workers had to be evacuated in November 2019, when the River Derwent threatened the works factory. National Highways have admitted that floodrisk will be increased, in REP4;10 pg 4 2.4.3 Both

Markeaton Brook and Mackworth Brook (see SFRA Allestree flood risk map) 2.5.4 **‘forming an important source of base flow to rivers’** 3.1.2 pg6 **“that the Secretary of State be satisfied that flood risk will not be increased elsewhere...”** 3.1.3 **“Consider risk of all forms of flooding”...“Take impacts of climate change into account...”**

Yet pg27 Vol 6 Chapter 14 Climate, states” **The ICCI assessment has not identified the potential for significant combined impacts of future climate change and the Scheme on identified receptors in the surrounding environment.”** Despite this admission, HE response to our Q37, was that **‘most climate change has been taken into account**

Pg 9 3.8.4 Environment Agency (EA) emphasised that **“surface water run-off should be controlled to existing rates or less”** The ‘existing rate’ has gone up considerably since November 2019. February 2020 rainfall levels were 141% of the average rainfall for February

4.5.1 Groundwater is known to flood in areas underlain by major aquifers and 4.5.2, 4.5.3 the **‘underlying geology is permeable’** Markeaton Park groundwater flooding occurred 20/2/20

4.5.6 **“The risk of groundwater flooding is considered to be high.”** A 40% climate change event is mentioned, yet 141% rainfall event already occurred throughout February 2020

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

Exception Test 2B **“The development must demonstrate that it provides wider sustainability benefits to the community, that outweigh flood risk.**

Regarding air pollution NH has already admitted the worsening of air pollution and we include again the relevant sections of our evidence In responses to EXA questions, re air quality (3 Schedule 10) HE clearly states**“The compliance risk assessment [REP6-020] and [REP7-009] concluded that all areas would be compliant in the Scheme opening year (2024) both with and without operation of the Scheme...”**

yet in responses to Derby FoE, HE states (REP 6-035 Vol 8.84) that **“Emissions overall would increase...”** , **“increased emissions from increased traffic on the A38...”** The A38 Junctions schemes would not assist the council in achieving compliance, especially as **DciC outline the additional and numerous city streets that would be impacted, by increased, or ‘re-assigned’ traffic from the A38 schemes. (REP6-037)** There is no indication of how much air pollution would be increased on these streets and the materially worse environmental effects.

Derby is a Government designated Clean Air Zone, in which Derby people are breathing substandard air. A worsened change this year, is that the city council has removed a cycle/bus lane in Friargate, in June 2021, impacting on nearby Stafford St, by increasing traffic/air pollution and sending a contrary message to youth/children, increasing emissions, pollution and road traffic dangers, to pedestrians and cyclists.

Other changes are that lorry numbers on the roads are decreasing, because of supply/driver shortages. Supermarkets such as Tesco, are already changing to

railfreight. [REDACTED]

People are also still working from home, the latest estimate is 15% of the workforce (down from nearly 50% in 2020) According to the Office for National Statistics 'When asked why they intend to use increased homeworking in the future, 80% of businesses cited improved wellbeing as the reason. Reduced overheads and increased productivity were also commonly reported reasons.'

New car sales are also still dropping

National Highways do not recognise the need to 'move away from the motorway'

We ask the Secretary of State to act FOR the people of Derby and the wider world community, to refuse to add to the climate, pollution and floodrisk burden, - especially for youth, children and future generations - those supposed to be protected by the Paris Agreement human rights designations - and instead dispense climate justice. We ask the Secretary of State to refer also to 'Decarbonising Transport:Setting the Challenge' consultation [REDACTED]

[REDACTED] in which co-benefits are • Reduction in inequality where those who generate less noise and air pollution are disproportionately impacted by pollution”

Another major change today is the United Nations report that the world will not meet the emissions reductions necessary, to keep global temperatures below 1.5oC, unless immediate cuts are made NOW, by half. It is up to developed countries such as ours, England, to cut our own emissions, to allow other less developed countries more time to save energy/switch to energy-efficient travel/energy/evacuate their countries ie Maldives, other low-lying island states.

The 4th and 5th UK Carbon Budgets will not be met.

The 6th UK Carbon Budget for aviation alone, will not be met. Add shipping and transport and our budget is completely overdrawn.

We are a G20 country and we are, all together, responsible for 78% of total world emissions

We ask when the missing Derby floodrisk map will be made available and thus a further extension of the inquiry.

Copies of previous evidence submitted to the A38 Junctions inquiry and referred to above, are also on [REDACTED]

We support Markeaton Action Groups and other objections to the destruction of our environment, trees and nature/biodiversity, the UK being the most nature-depleted country in the world. In 2021 the UK COP26 year, we are supposed to be setting an adult example to the world, of the restraint necessary, to save resources - for the young and future generations especially- in this, a developed country.

We ask the Secretary of State to act, on behalf of those who are not able to.

yours sincerely

D Skrytek

Derby and South Derbyshire Friends of the Earth