

## **DERBY & SOUTH DERBYSHIRE FRIENDS OF THE EARTH 8**

The Secretary of State requested notification of changes.

There have been FOUR major UK storms so far, in 2022, three of them in one month, because of worsening climate change. At time of writing, there has been exceptional, unseasonable warmth in western + central Europe, many cities hitting 20oC for the first time this year. Somalia is still suffering intense drought and malnutrition due to crop failure. A tornado warning in New Orleans, Louisiana. A rare red weather alert in New Zealand North Island, where intense rain has triggered flooding.

Highways England changed their name to National Highways, (NH) yet refuse to carry out National carbon forecasts. If NH won't produce cumulative emission results, then they cannot claim that the emissions will have no bearing on UK Government Carbon Targets. The Secretary of State cannot make an informed decision without such figures. The carbon emission figures are needed for RIS1, RIS2 and in addition, NH needs to add the cumulative carbon for the further new developments that NH is planning 'The pipeline for RIS3' [REDACTED]

## **FLOODRISK AND PUMPING STATION TECHNICAL 'SOLUTIONS'**

Worldwide weather disasters are increasing. The River Derwent flooded Derby again this year and workers were evacuated from the Rolls Royce nuclear reactor again (previously in 2019 too) A new development, another change, a high-carbon, resource-intensive pumping station, is proposed, (response to Mair Bain and Dr Boswell pg 53 of 62) yet the fact that this will cause flooding elsewhere, to the communities downstream of Derby, and the nuclear reactor, is not recognised. NH has not, to date, responded to queries about this floodrisk, elsewhere, yet claims to have addressed floodrisk..(responses to Derby and South Derbyshire Friends of the Earth queries on flooding)

Why does NH not recognise the fact that Markeaton Park is part of river valley blue-green infrastructure, being taken up by cities worldwide?

Pumping stations account for 35% of Environment Agency carbon emissions.

'Using Science to create a better place;Resource use in the Environment Agency: the energy efficiency of pumping stations and their associated infrastructure'

## **PARIS AGREEMENT + ECONOMIC SEGREGATION**

We maintain that NH are climate emergency deniers and have not taken into account the communities, people and children, who will be harmed by their actions, in the loss of public open space and services, worsening climate change impacts and air pollution, re the Paris Agreement

In NH response to us, they appear unable to understand the Paris Agreement, so we refer to the relevant sections here-

'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**'

What is it about this section that NH is unable to understand? The Paris Agreement is clear on human rights issues and this is National Policy. The A38 Junction schemes are a massive imbalance, in that public land is effectively being taken from the poorest sectors, namely the sick, disabled, women and those without access to cars, and given to those more affluent sectors, who can afford car travel. Air pollution, noise and a degraded quality of life is driven to them, in return. The new park entrance layout, on Ashbourne Rd, shows that car travel to the park is to be actively encouraged. The Secretary of State has an opportunity to correct this imbalance.

### **TECHNICAL ELECTRIC 'SOLUTIONS'**

NH does not appear to agree that the poorest and most deprived sectors of non-car driving society – mainly the above - require assistance, especially as the coronavirus pandemic has not ended. Nor has the climate emergency. NH ignore the cost of living crisis too, running alongside the climate crisis, when they state on pg 8 of Applicants Response to Secretary of State “this updated version allows for a greater take-up of low emission + electric vehicles” Electric and low-emission vehicles are expensive and the majority of people in this country cannot afford them. They also carry their own environmental damage

In answers to the Secretary of States questions on the qualifications of the NH experts, 2 of the leads on the climate-change associated documentation, are named as 'technical'. NH is still going down the road of 'technology', which has enabled the climate/biodiversity crisis, and is actively worsening climate change.

### **DIESEL LORRIES**

Lorries are not electric and run on diesel.

The grade separation, for bigger, more polluting lorries, will only enable MORE lorries, traffic, air pollution. Why does NH ignore the fact that many companies are now diverting to railfreight?

Other wealthy countries are now subsidising railfreight, which removes lorries from roads, instead of continuing to cater for them, The trains in Spain, are of course, electric.

Can NH inform us if they have added the carbon emissions, and air pollution figures, from longer and wider lorries, to the domestic transport carbon and air pollution emissions forecasts?

The UK Government is currently re-investigating plans to impose toll roads, which will drive more lorries/cars OFF the roads.

## FOSSILFUELS AND THE CLIMATE CRISIS

A new study from the Tyndall Centre for Climate Research, at Manchester University, found that wealthy countries had until 2034 to stop all oil and gas production, to give the world a 50% chance of preventing devastating climate breakdown, while the poorest nations that are also reliant on fossilfuels should be given until 2050. NH does not address the impacts of their road policies, which rely on CONTINUING fossilfuel abstraction and fuel duties.

The group Transport+Environment found that the rich drive more and own larger cars that consume more fuel. The richest 10% of EU households spend 8 times more on fuel than the bottom 10%, with a similar divide in the UK.

The current war in Ukraine is added to the need to curtail fossilfuel use and stop inducing more driving of cars/lorries.

## DRIVING INEQUALITY AND AIR POLLUTION

In the UK today, (23/3/2022) high levels of air pollution were reported, especially in eastern and southern England. This impacts young children, elderly, sick and disabled and causes ill health in the previously healthy. [REDACTED]

Regarding inequality effects, the UK Government states the following in the March 2020 'Decarbonising Transport:Setting the Challenge' consultation [REDACTED]

“The Fifth Assessment Report of the Intergovernmental Panel on Climate Change defines co-benefits as being “the **positive effects that a policy or measure aimed at one objective might have on other objectives**”. Co-benefits of positive action on reducing transport emissions include: • Public health benefits through increased **active** travel and **improved air quality**; • Improvements to the economy and employment rates through industry and innovation;

- **Reduction in inequality where those who generate less noise and air pollution are disproportionately impacted by pollution”**

NH acknowledge that the schemes will cause more pollution, in their answer to our question Q37 HE admits (REP 6-035 Vol 8.84) that “**Emissions overall would increase...**” , “**increased emissions from increased traffic on the A38...**”

It is not clear if the study area has captured all possible issues on air quality – traffic displaced from one area can go on to add worsen air pollution at places some distance from the scheme itself

- On the studies done, clearly this scheme would worsen air pollution in some areas, even if improving it in others
- The scheme would make air pollution already over legal limits even worse at one location in the construction scenario ‘0’ – while HE claim this would not be an

issue as it would not delay the East Midlands Air Quality Zone achieving compliance, this test (as per paragraph 5.13 of the National Networks NPS) is not an adequate test, and such worsening should not be allowed.

- NB There is much support for the view that this test is not adequate - eg an EU clarification letter to Clean Air in London

[REDACTED]

and Client Earth judgements CE 2 and CE3)

[REDACTED]

or

- Other results are sometimes very close to the 40ug/m<sup>3</sup> legal limit, and are thus at risk of breaching it – even in the opening year there is one level over 35ug/m<sup>3</sup>, and under the construction phase several close to 40ug/m<sup>3</sup>.
- This is particularly important as the 40ug/m<sup>3</sup> level is not a ‘safe’ level – the World Health Organisation (WHO) have found health effects below 40ug/m<sup>3</sup>, and will be revising their standard:

[REDACTED]

Why has NH not addressed this?

Mention is made of Derby City Council Behaviour Change Group, yet we find that NH is unable to change their own behaviour, namely that road-building is their answer to the climate emergency

One of the worse changes, which the Secretary of State wished to be informed of, is the plan by the UK Government, to worsen air pollution

[REDACTED]

This impacts especially, on the communities referred to above, who are supposed to be protected, in the Paris Agreement.

We ask the Secretary of State to take up the challenge, on behalf of communities who are least able and refuse the A38 Junctions plans, which are outdated, polluting, carbon and resource-intensive and a waste.