

PROPOSED FREEPORT ON ETWALL/EGGINTON COMMON (EMIP)

Outline Briefing - prepared by Egginton Parish Council (in advance of the Budget announcement on 3 March 2021)

SIGNIFICANT CONCERNS - Egginton Parish Council has significant concerns over the impacts of such a major scheme on;

- The fabric of the rural community with its farming interests;
- Major disruption to home owners living nearby;
- Its massive flooding, drainage and groundwater problems;
- Its highways network, local roads and noise; and
- Visual intrusion, wildlife, loss of habitats and geology.

This note sets out the immediate headlines of these concerns to assist planning considerations.

BACKGROUND TO SITE - Egginton Common is a large and flat area of ancient Common, restored after gravel extraction and is now greenfield and open countryside recovered to agricultural and local recreational use. It was originally owned by the local Every family, who still reside in the community. Common rights exist over this land which is regularly used by dog walkers, cyclists and for general recreation. Historically, it was the site of the largest battle in Derbyshire during the Civil War – the famous battle of Egginton Heath in 1644. Large scale industrialisation of this rural landscape does not sit easily with the low scale 19th century vernacular houses, Grade I listed Norman church of St Wilfrid's, Grade II listed Old Rectories of Egginton and Etwall, Grade II listed Park Hill and Blakeley Lodge, which adjoin the site - nor Etwall's Conservation Area. There is also a WW2 pillbox within the site of historical significance and is locally listed.

DEVELOPMENT PRINCIPLE - The principle of shifting the movement of freight from road to rail is, at a national level, appealing. Indeed, Government has recognised the inherent environmental [and increasingly economic] advantages by advocating a network of Strategic Rail Freight Interchanges [SRFIs] across the country. In doing so, Government has acknowledged the essential scale of such enterprises with minimum land-take requirements and a minimum capability of accommodating freight trains....4x750m long trains per day at the outset.

By definition these facilities are very substantial developments. They are therefore 'market-led'; there are only so many locations which might be suitable, with direct access to a freight rail line as well as the strategic road network. The investment is huge; as is the development value.

So, where a potential scheme does demonstrate the locational, functional and financial attributes to succeed, it will necessarily, through size and operational essentials, impact significantly across an extensive geographical and environmental range. Fundamentally, however, proximity will exacerbate this impact.

Notwithstanding the principle of SRFIs, the tests of local acceptability must be rigorously applied, because impact will be primarily local. It will be constant and enduring. An existing community nearby, such as Egginton, will inevitably be adversely affected and, if the fundamental appropriateness of an SRFI is to be accepted, then those local impacts must be identified and comprehensively addressed.

CONSULTATION - There should be a full consultation with all members of the community, local organisations and businesses with information made widely and easily available.

MITIGATION OF SITE IMPACT - Any attempt at assimilation of a Freeport on the proposed site, rests on the area of land south of the railway, which should be made into a protected, open area with the introduction of public rights of way. Such designation should be legislated in perpetuity. Specifically, that land between the railway line and the A5132 to the South and the A38 to the East. This area should be extensively planted with trees, while existing trees should be protected and maintained, including those within the Marlpit Plantation (which needs draining and dead trees removed). It should feature lakes and detention ponds with public rights of way created and large, attractively grassed and planted earth bunds to help mask and mitigate the impact of large structures and buildings. This buffer is essential to the protection of the community of Egginton from the adverse environmental impacts of this proposed, out of scale development. An exemplar is JCB at Rocester and the adjoining Toyota site at Burnaston.

PRINCIPAL CONCERNS - **The principal and overriding concerns for this ancient community of Egginton arise from the highly likely negative impact**

this proposed development will have on existing and unresolved problems with groundwater, flooding and drainage.

Egginton lies in Flood Zone 3. The highest risk. Flooding is an annual event.

The displacement of the groundwater from such a massive proposed site involving extensive excavation must be calculated and engineered in such a way as to avoid increasing groundwater problems occurring downstream in Egginton. **The present village drainage system is outdated and fractured, such that at times of moderate to heavy rain, the increased height of the water table is such as to force water into the foul and storm water systems. Severn Trent Water will confirm that foul water has come up through manhole covers causing contamination of floodwater in Duck St, Main St and Fishpond Lane. This unpleasant and unhealthy consequence is becoming a regular event. STW have recently spent weeks pumping out the flooded village streets. On many occasions sandbags have had to be deployed to prevent houses flooding. The recently EA constructed flood-banks, which encircle the village, have proved effective in relieving properties from fluvial flooding but have failed to address the major groundwater problems which arise inside the village flood defence.**

As a priority, any large-scale industrialisation of the upstream Etwall and Egginton Commons must clearly demonstrate the downstream effects on groundwater and flooding. Any Section 106 monies or funding for off-site remediation, should include the enhancement of village flood defences and the provision of a modern, pumped drainage system for the entire village of Egginton. Sums should be provided for watercourse maintenance, surveillance and monitoring stations along watercourses. **Off and on-site flood prevention works should be completed prior to any Freeport construction.** The site should include its own sewage disposal plant which does not place further strain on the local systems. **There should be absolutely no additional drainage to Egginton, Egginton Brook or any of Egginton's other local watercourses.**

The site contains a designated reservoir, inspected monthly. Development should be avoided on this reservoir, which was specifically designed to contain surface water arising from the Toyota Plant. If development should arise, then comprehensive and demonstrably equivalent and effective compensation should be engineered elsewhere on the site.

TRAFFIC IMPACTS - Traffic generated as a result of the proposed development should be confined to the strategic road network of the A38 and A50 with appropriate access points to the site, away from local housing with no access to local roads while the Kings Bridge (NSS/97) connecting the Commons over the railway line should be closed or demolished. There should be no access to the site from Boundary Road to protect local roads from traffic.

There should be no parking of HGVs on local roads and free of charge HGV parking should be provided within the Freeport site as a planning condition.

The A5132 and Etwall Road crossroads is an accident black spot and a roundabout, refuge island or other improved road safety measures will be sought.

Emergency planning for accidents on the strategic road network need to be reviewed. These roads give access to the Royal Derby Regional Hospital.

Noise levels from a development operating 24/7 for 365 days of the year is likely to have an adverse impact on the life of our local community, currently enjoying particularly low ambient noise at night and during Bank Holidays.

Pollution from diesel emissions from extensive and frequent vehicle movements both on the highway network and within the site pose health risks and fear of health risks for local residents.

From an air-quality perspective and as another step towards cleaner air, locally, we consider it should be conditioned that all the on-site goods-marshalling vehicles are required to be zero emissions (or possibly LNG powered).

Additionally, extensive tree planting both on and offsite is very important, with an extension of a maintained, green grid from Toyota through and within the village of Egginton an imperative. A regular independent air pollution audit, financed by the owners/operators, should also be conditioned.

Long freight trains may cause long delays on local roads particularly at the level crossings. A bridge over the tracks at the former Egginton Junction would assist and ensure an alternative route to Etwall and the secondary school for local pupils.

Thousands of employees will have to be bussed in or travel by car from a wide area using the strategic road network for access. Any travel plan must exclude local roads and measures taken to police this.

CRIME - Experience at other such sites – for example, DIRFT near Daventry – indicates an increase in crime. Night security patrols should be provided during and after construction with additional police officers and patrols funded by the developers/operators, as is done at DIRFT.

UTILITIES - Pressure and demand for basic utilities such as water supply, telecoms, energy should not cause detriment to local communities. Betterment is required and specialist consultants should be engaged to secure facilities for all communities.

COMMUNITY ENHANCEMENT - Egginton will prepare a list of Community Chest considerations.

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*Prepared by; Miles Nesbitt, Chair of Egginton Parish Council,
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