

ETWALL PARISH COUNCIL

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FREEPOST
EMIP CONSULTATION

Dear Sirs

CONSULTATION ON THE PROPOSED EAST MIDLANDS INTERMODAL PARK, SOUTH DERBYSHIRE

Etwall Parish Council has discussed the proposals for a strategic rail freight interchange as described in your Newsletter Issue 1 and at the exhibitions held in and around Etwall and is opposed to the development of this site for a strategic rail freight interchange for the following reasons:-

- 1 **Consultation** – The consultation leaflet and drop-in session provided insufficient information to make an informed choice on Options A, B and C. When questioned those present gave conflicting answers to queries which left many people confused and with little confidence in the explanations given. According to the developers there will be no speculative building on the site and there are currently no firm commitments from companies wishing to occupy the site. Therefore we are being consulted on what is predicted with little or no definite information.
- 2 **Traffic** – The traffic predictions for the site will impose a huge burden on the A38 in particular, which is already under pressure, coupled with the possible additional traffic impact from the East Midlands Gateway Railfreight Interchange at Castle Donington (if approved). The Burnaston Interchange by Toyota has already been the subject of an inquiry and the Inspector found that road configuration to be inadequate. In the Appeal Decision letter of 19th August 2010 the Highways Agency maintains an objection on policy grounds “ ... the SRN (Strategic Road Network) ... should not be utilised by unsustainable or otherwise inappropriate development”. The Strategic Distribution Site Assessment Study for the Three Cities Sub-Area of the East Midlands raised concerns about the affect an anticipated 200+ vehicles in the morning peak period on the A38. The plans exhibited showed the vast majority of the traffic heading east. This raises the question of the suitability of the site if most of the traffic is heading in one direction.

Recently there have been several occasions when the A38 and A50 have been closed for long periods of time due to accidents has any thought been given to how and where traffic would be diverted?

Should approval be given to this development, construction of a new access must be completed before work is started on site to ensure that all construction traffic comes off the A50/A38 rather than using local roads.

Plans allow for all HGV traffic to come off a new junction at the Toyota roundabout but as public transport is poor or non-existent there is likely to be increased traffic through the local villages from the predicted 7,000 employees accessing the site. Etwall is currently almost gridlocked at 9.00 am 3.15 pm when over 2,000 students are going to and from John Port School to surrounding villages. Any shift changes at these times should be strenuously avoided.

Free on-site parking should be provided for all vehicles to avoid HGV's parking in local lanes and lay-byes with the possibility of congestion and increased crime and litter spoiling the environment.

With trains of approx. 750 m in length and up to 12 trains a day from this development plus the existing three passenger trains per hour, together with existing freight traffic and any additional trains created by the East Midlands Gateway Railfreight Interchange at Castle Donington, local residents would be unable to pass from village to village without frequent and extremely long waits at level crossings. This would also have an effect on the already poor bus service due to increased waits at Hatton and Hilton rail crossings.

- 3 **Flood Risk** – There is no flood risk assessment or description of the Flood Models used by their contractors. The description of balancing lakes and their control structures is vague and sketchy and this type of control of water run-off resulted in nearby Willington being flooded when water was released by Toyota.

The additional housing for Mickleover and Etwall which is referred to in the Local Plan should be taken into consideration as the increased water run-off will also be directed into the Etwall Brook upstream of the proposed development.

- 4 **Greenfield Site** - The proposal is for an industrialisation of the open countryside on a largely Greenfield site in a rural area, historically used for very many years as a village common by residents for the pursuit of leisure activities including bird watching, horse riding, walking, cycling and beekeeping. It is also a resting and feeding site for bats.

- 5 **Visual Impact** – Mitigating the visual impact on the surrounding properties, the local area and from further afield such as from the Bretby Ridge will be very difficult in such a flat landscape. Tall warehousing would be alien to the village schemes of Etwall (with its Conservation Area) and the ancient churches of Etwall and Egginton.

- 6 **Employment** – The claim has been made that 7,000 jobs will be created. There has been no basis for this assumption other than the Cranfield Business School Model that X number of feet of warehousing = X number of jobs. As employment in South Derbyshire is currently just below 2% there is no evidence to show how many of these additional jobs would go to local people or to those from outside the immediate area. We would have to assume that people coming from outside the immediate area would be travelling by car as there is insufficient public transport.

- 7 **Housing** – If the development were to go ahead it is likely that the Local Plan would be reviewed and with this the need to provide more housing in the area together with a consequential increase in demand for local services such as schools, doctors, hospitals etc.
- 8 **Railway** – There was a prediction of an initial increase of two trains per day growing to an additional 12 trains per day once the construction was completed. The trains were expected to be approx. 750m in length (almost half a mile). These would have to be fitted around the existing train service meaning more night train movements. The additional 12 trains per day does not take account of additional trains associated with the East Midlands Gateway Railfreight Interchange (should that be approved). This would have a huge impact on properties along the railway line, especially during the night. Any rail shunting should be sited away from local properties and concerns have been expressed about the design of the shunting yard areas.
- 9 **Pollution** – The Local Plan states that there shall be no unacceptable amenity or safety impacts including noise, vibration, odours, light pollution and traffic generation. It is expected that there would be air quality issues from the increase in trains, buses and cars.

Earth bunds, together with appropriate planting would be required on the land owned by Severn-Trent between the A50 and Jacksons Lane to prevent noise from bouncing back towards local houses.

It is expected that the site would require perpetual daylight so lighting would need to be mitigated to ensure that it did not affect residents of local properties.

The site needs to be made a White Noise Area so as to avoid disturbing local residents.

- 10 **Water/Sewage** – The water pressure in Etwall is often very poor. What would the effect of this development be on local water supplies? It would appear that no consideration has been given to the discharge of foul water sewage from the site and recent problems with the sewage outfall at the pumping stations at the A38 and in Egginton village indicate the infrastructure between Egginton Common and Clay Mills lacks any capability of managing the sewage discharge from 7,000 employees.

We hope that you will take the above comments into account when deciding whether to pursue this project.

Yours faithfully

LYNNE GARDNER
Clerk to the Council