

Draycott and Church Wilne Parish Council – Full Planning Objection Report

Planning Application: PA/2026/0452, Residential development of 234 dwellings

Location: Land South of Derby Road, Draycott

1. Introduction

Draycott and Church Wilne Parish Council has undertaken a detailed review of the planning application for the construction of two hundred and thirty-four dwellings at Land South of Derby Road, Draycott. This review has considered the Planning Statement, Biodiversity Net Gain Report, Arboricultural Assessment, Design and Access Statement, Flood Risk Assessment, Noise Impact Assessment, Drainage Strategy, and all other supporting documents published on the Erewash Borough Council planning portal.

The Parish Council has identified **substantial and material planning harms** relating to environmental impact, landscape character, flood risk, drainage capacity, on site biodiversity loss, road safety, demands on already overstretched infrastructure, and policy compliance. Many of these harms are **explicitly acknowledged within the applicant's own documents**, which significantly undermines the soundness of the proposal.

For these reasons, the Parish Council **formally objects** to the proposed development.

However, if Erewash Borough Council is minded to approve the application, the Parish Council sets out a series of **conditional requirements** later in this report. These conditions are essential to mitigate harm and ensure that the development contributes positively to the parish to accommodate and aid the integration of the increased population into the village community.

These conditional comments are made **without prejudice** to the Parish Council's formal objection.

2. Key Planning Concerns

2.1 Loss of High-Quality Countryside and Agricultural Land

The applicant confirms that the site is almost entirely undeveloped countryside:

An area of approximately 0.74 ha is identified as "Previously Developed Land."

The applicant also confirms:

"The site is recorded as Grade 2 very good quality agricultural land."

This means that more than 90% of the site is **Best and Most Versatile agricultural land**, which national planning policy requires to be protected. The proposal would permanently remove productive farmland, hedgerows, and rural landscape character, resulting in significant harm to the western edge of Draycott.

Furthermore, the applicant uses the term Previously Developed Land – this is not included on Erewash Borough Council’s designated brownfield register. Therefore, the applicant’s reliance on this land to justify development weight is unsound.

2.2 Biodiversity Net Gain Failure

The applicant’s own Biodiversity Net Gain Report states:

“The site will result in a -32.81% loss in habitat units.” “The proposals fall short of national policy requirements to deliver a 10% gain... offsite habitat units will be required.”

This is a **direct admission** that the development:

- Causes substantial biodiversity loss
- Cannot meet mandatory 10% Biodiversity Net Gain on-site
- Relies on off-site units, contrary to the Environment Act 2021
- Fails the biodiversity hierarchy, which primarily requires on-site avoidance and mitigation.

The applicant’s own evidence confirms that the proposal **does not comply with national law**.

2.3 Climate and Ecological Emergency Declaration

In October 2023, Erewash Borough Council formally declared a **Climate and Ecological Emergency**, committing to:

- Reduce emissions
- Protect natural environments
- Make climate-responsible planning decisions

This development directly contradicts those commitments because it:

- Removes carbon-absorbing farmland, hedgerows, and trees
- Increases car dependency and emissions
- Places new homes adjacent to a known fluvial flood risk area and evidential risk of surface water flooding
- Results in significant biodiversity loss
- Requires off-site biodiversity compensation
- Urbanises a rural landscape that currently supports wildlife corridors

Approving this development would be inconsistent with the Council’s own climate emergency declaration.

2.4 Flood Risk and Drainage Concerns

The applicant’s Flood Risk Assessment states:

“The proposed development lies wholly within Flood Zone 1 with Flood Zone 2 and 3 touching the site boundary to the south.” “Infiltration is not viable... discharge will be to the nearest ditch which ultimately discharges to the River Derwent.”

This means:

- The site directly borders the River Derwent floodplain
- Surface water will be discharged into a ditch flowing to the River Derwent
- Downstream flood risk will increase placing existing properties already known to have previously flooded at

greater and more increased risk of flooding • Climate change will exacerbate flood risk over the development's one hundred-year design life

The applicant also confirms that foul water will be pumped uphill to Derby Road:

"Foul water will be conveyed to an onsite pumping station... discharged to the existing public combined sewer at Derby Road."

This introduces significant operational risk. Pumping stations can fail due to:

- Power outages • Mechanical breakdown • Blockages • Storm events

Failure could result in foul flooding, pollution, or sewer surcharge, there is no mention of two pumping stations (one for mitigation for failure of the other)

2.5 Independent Drainage Appraisal – Michael Evans and Associates

The independent drainage appraisal commissioned by local residents and shared with the Parish Council identifies **serious concerns** that are not addressed by the applicant.

Key findings include:

- Fields within and surrounding the site have suffered ground water flooding in recent years as evidenced by residents • Photographs from 2022 show fluvial flooding consistent with Environment Agency Flood Zone 3 • Surface water flooding already affects properties on Lime Grove and Wilne Road • The existing combined sewer network has previously surcharged and flooded • Severn Trent Water cannot guarantee that the existing network between the site and the pumping station has sufficient capacity • The clay ground conditions make soakaways unviable • Surface water discharge to the River Derwent requires crossing third-party land, which cannot be guaranteed • Attenuation requirements may increase due to updated climate change guidance • The site may not be able to accommodate the housing numbers proposed • The development may be undeliverable or unviable due to drainage constraints

This independent evidence strongly supports the Parish Council's objection.

2.6 Transport and Access Concerns

The applicant confirms:

"Vehicular access and egress will be achieved via a single point from the A6005 Derby Road."

A single entry point for 234 dwellings on a busy A-road raises serious concerns:

The Transport Assessment largely focuses on accessibility and proposed mitigation rather than demonstrating that substantial spare capacity exists within the highway network. The assessment confirms that the existing site access is unsuitable and requires significant upgrading. It also records approximately 8,700 vehicle movements per day on Derby Road and identifies 10 injury collisions, including one fatal collision within close proximity of the site access which we believe is 3 fatalities

close to this site in the past 3 years. Furthermore, the Travel Plan relies upon an ambitious increase in public transport usage from 7% to 34% despite Draycott having no railway station and limited sustainable transport infrastructure. The Parish Council therefore remains unconvinced that the proposed development can be accommodated without adverse impacts on highway safety, congestion and the wider transport network.

There is a non-mentioned issue with speeding along this route which is measured at this location by a Speed Indicator Device recording incoming traffic. The speeding issue was supported by DCC Highways acknowledging the issue on this road and painting dragon's teeth towards the start of the 30mph zone in 2025. The installation of dragon's teeth has produced a reduction in mean speed of 0.4mph which appears insignificant when the highest speed recorded is in excess of 100mph.

We would request the physical presence of DCC Highways when they undertake their consultation feedback to enable them to witness and monitor the traffic flows at the proposed intersection and the proximity of the bridge to the proposed entrance rather than a desk-based analysis.

The proposal does not demonstrate safe or sustainable transport arrangements for traffic and pedestrians.

2.7 Pressure on Local Services

The applicant lists local amenities but provides **no evidence** of capacity for:

- Draycott Community Primary School • Secondary Schools in Long Eaton and Sandiacre • Local general practitioner practices • Local pharmacy • Community facilities

Residents already report difficulty accessing general practitioner appointments, dental care, and school places. The proposal would significantly increase pressure on already stretched services.

2.8 Incorrect Use of National Planning Policy

The applicant repeatedly references the **National Planning Policy Framework 2024**, despite the current version being **National Planning Policy Framework 2026**.

The applicant also relies on the concept of **Grey Belt**, which is **not yet included within national policy frameworks** and therefore carries no formal weight.

Furthermore, the applicant states that the withdrawn Core Strategy Review “carries no formal status,” yet relies on it to justify the scale and location of the development. This is contradictory and undermines the credibility of the planning case.

2.9 Harm to Green Belt

The applicant's own Green Belt assessment states:

“A reduction in openness.” “An increase in built development.”

These are explicit acknowledgements of harm to Green Belt land. The proposal does not preserve openness, does not safeguard countryside, and does not comply with national Green Belt policy.

3. Discrepancies Identified in the Applicant's Documents

The applicant's documents contain several contradictions and admissions that undermine the proposal:

1. **Reliance on a withdrawn Core Strategy Review** The applicant states it has no formal status but uses it to justify development.
2. **Incorrect national policy references** The applicant uses National Planning Policy Framework 2024 instead of the current 2026.
3. **Use of Grey Belt terminology** Grey Belt is not yet adopted in national policy and cannot be used to justify development.
4. **Previously Developed Land misrepresentation** The land is not on Erewash Borough Council's brownfield register.

These discrepancies significantly weaken the planning justification.

4. Conditional Requirements (If Erewash Borough Council Is Minded to Approve)

If Erewash Borough Council decides to approve the application despite the significant planning harms identified, the Parish Council requests that the following conditions be secured through a legally binding Section 106 Agreement.

4.1 Biodiversity Net Gain – On-Site Delivery

Given the applicant's admission of a 32.81% biodiversity loss, the Parish Council requires:

- A reduction in dwelling numbers to create additional ecological land
- Removal or relocation of the proposed on-site play area to allow for woodland expansion, hedgerow planting, species-rich grassland, and habitat creation
- Full delivery of 10% Biodiversity Net Gain on-site, not through off-site units – Draycott should not lose its ecological character as a result of this expansion

To ensure no loss of play provision, the Parish Council also requires:

- A financial contribution for upgrading and the long-term maintenance of the Millennium Green play area

4.2 Village Community Hub

The scale of the development will significantly increase population and pressure on community facilities. The Parish Council therefore requires:

- A dedicated Section 106 contribution to aid in the construction of a new Village Community Hub
- The facility to be owned and operated at parish level
- Provision of

meeting rooms, youth activity space, social programmes, sporting facilities, emergency shelter, and flexible community space

4.3 Public Rights of Way Improvements

Public Right of Way number 4 will be directly affected. DCC Public Rights of Way should have:

- Funding for surface improvements, signage, accessibility upgrades, and landscaping
- A commuted sum for long-term maintenance

4.4 Landscape and Drainage Safeguards

To mitigate environmental harm, the Parish Council requires:

- A strengthened landscape buffer along the western and southern boundaries
- Independent review of Sustainable Drainage Systems by the Environment Agency and Severn Trent
- Annual Sustainable Drainage Systems maintenance reporting to Erewash Borough Council and the Parish Council
- 2 pumping stations to work in tandem / back up in case of failure

4.5 Governance Requirements

All obligations must be:

- Legally secured through a Section 106 Agreement
- Payable directly to Draycott and Church Wilne Parish Council where relevant
- Indexed to retain value over time
- Front-loaded to ensure early delivery

5. Conclusion

Draycott and Church Wilne Parish Council has identified **significant and unacceptable planning harms** relating to:

- Loss of high-quality agricultural land
- Harm to Green Belt openness
- Failure to deliver mandatory Biodiversity Net Gain on site
- Increased flood risk and drainage uncertainty
- Pressure on local services
- Unsustainable transport arrangements
- Contradictions and inaccuracies within the applicant's documents
- Conflict with Erewash Borough Council's Climate and Ecological Emergency declaration

The Parish Council therefore **formally objects** to the proposed development.

However, if Erewash Borough Council is minded to approve the application, the Parish Council requests that the conditions set out in Section 4 of this report be secured in full.