**DRAYCOTT AND CHURCH WILNE PARISH COUNCIL**

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Planning Department

Erewash Borough Council

(Delivered by Hand)

**EBC Core Strategy Revised Plan Consultation**

Draycott and Church Wilne Parish Council (DPC) wish to object to the proposal to accept the amended Core Strategy review specifically the inclusion of the deallocation of green belt status and the subsequent potential development of the land to accommodate up to 190 homes with the potential to develop the ‘safeguarded’ land in the future to the SW of Draycott.

There are many reasons for our objection but principle amongst these is the overwhelming view of residents to object and as an elected council in such instances it is incumbent upon us to express the views of the voting public which was decisive with 74 of 75 voting to object with one abstention.

EBC may be aware that DPC have supported a group of residents in setting up and running a group whose aim it is to gain as much information about the site and its potential development and to share this information with residents to help them come to an informed decision about the proposals. It was felt that this was a sensible and democratic move on the part of the residents to provide as many people with up-to-date information on the plans and as such was a move supported by DPC.

Below is a set of our most pressing concerns, many of which come from the working group along and the reasons behind our objection but there are many more which it would simply be impractical to include here but these could be made available to the independent planning inspectorate if requested at a later stage:

1. EBC Procedures:

DPC were caught completely off-guard by the confusion resulting from the lack of prior warning about the plans. The opportunity for DPC or the public to raise questions relating to the proposals was denied by the fact that DPC (a statutory consultee) received no prior communication about what was planned and the deadline for the public to ask questions was closed approximately 2 days before the agenda for the meeting and its content were published and the meeting to which it related specifically stated that the public were not permitted to speak. This we feel is a denial of the public’s democratic rights and contravenes the regulations around the issuing of procedures relating to public meetings.

1. Lack of transparency and unwillingness to provide critical information:

EBC allocated the minimum 6 weeks for the consultation period in the knowledge that this period commenced at the start of many family’s 2 week Easter holiday which included 2 bank holidays together with a further May bank holiday. This has denied many residents the ability to request information through FOIs as the 20-day period would expire at about the time a response had to be made limiting the opportunity to make a reasoned and informed argument to support their decision. A request to extend this period was denied on the grounds that there should be no need to seek further information and everybody was able to respond in the time available despite the fact that many people did not know about the proposals or that they did not have sufficient IT skills to access information.

Several requests for information have been put to EBC, EA, Severn Trent and Network Rail, in many cases the information is extremely brief and lacking in depth or is unsupported by analysis and in some cases has not arrived in time for us to include in our objections. This has made it difficult to compile a case of why the proposal should not continue further or if it were to proceed a series of reasoned and supported observations which should be considered by the planners and developers.

1. De-allocation of Green Belt status:

Much of the land under consideration which surrounds Bankfields Farm is of a good agricultural grade, its loss to agriculture, its productivity and its benefit to the local environment will be permanent.

Green belt land, once developed in any way can never be recovered, its presence around rural villages such as Draycott is significant to the heritage and nature of the village and its environs. The stretches of un-developed land between Derby and Nottingham are already vanishingly small, the removal of more fields will denude even further this corridor of what remaining green spaces it still has and bring the communities of Draycott and Borrowash a little closer.

1. Loss of habitats and damage to ecosystems and biodiversity net gain:

There is considerable evidence of the presence of a variety of animal species within this area, including some protected species. There have been recent recordings of 4 species of bat within the tree canopies and hedgerows in and around the area which include 8 Noctule, 8 Common Pipistrelle, 4 Soprano Pipistrelle and 1 Brown Long-eared Bat as surveyed by Long Eaton natural history group on Friday 4th May ‘25. Barn owls, badgers and their setts, muntjac deer, otters and foxes.

The requirement to include a BNG in the proposal whilst on the surface appears commendable is of little value to the residents of Draycott when there is every possibility that the net gain benefit will be felt elsewhere in the country. There is no requirement for the benefit to be close to the affected site and as such whilst the residents of Draycott suffer, someone else (if the requirement is met) shall gain. This is little comfort to the residents of Draycott who will suffer this permanent loss.

1. Traffic:

The entrance to this development which is most likely at or very near the existing track to the farm would join Derby Rd at an acknowledged (by DCC & Derbyshire police) speeding point with several fairly recent serious and fatal accidents within just a few metres of it. Verified speeds entering the village at this point which changes from 40 to 30mph as the road drops from the rail bridge with a slight bend, house entrances and a central reservation have been recorded at a maximum of 106mph on a weekday evening with over 200 incidents exceeding 70mph in the last 18 months.

Derby Rd already has flow rates of over 500 vehicles per hour in each direction during mornings and evenings, this development along with the developments in Borrowash and Breaston will increase this figure further.

1. Lack of health, education and welfare infrastructure:

This proposed development is likely to add 500-600 additional residents to the village population. Draycott does not have any medical facility within the village, all residents would have to find transport to the neighbouring villages which themselves are already struggling with GP capacity and a complete lack of NHS dental provision for miles beyond.

There is possibly adequate capacity for children from yr1 to yr6 within the village but secondary school children will require the provision of school transport twice per day.

1. Sewerage capacity:

There are already instances of the foul water drainage being overwhelmed on Lime Grove and the surrounding area and it is known that Severn Trent have had to undertake emergency repairs to drainage pipes between Draycott and the sewage treatment works on Sawley Rd and have had the need to temporarily pump sewage to cope with the load. Some residents have complained of sewage backing-up in ground floor lavatories which they have been unable to flush for several days and of manhole covers being displaced. An independent engineer’s report is attached which was commissioned by the group, this highlights the already parlous and inadequate state of the foul water drainage system within the village.

1. Drainage of surface and fluvial water flooding:

Until recently, actually after the extra-ordinary council meeting of 27th March where the plan was voted to go to consultation the area was largely within Flood zone 1. It was with much hilarity, incredulity and anger from the public that the planning officer claimed that the flood zone attribution had recently been removed yet it was still on the ST website maps for some time after this which indicates that the planning work was undertaken in the knowledge at that time that the land was prone to the risk of fluvial flooding. Despite repeated efforts we have been provided with no evidence that any mitigating actions would be employed should development go ahead.
Much of the lands surrounding Draycott suffer from surface water flooding, this site is no exception. Given the low-lying nature of the flat lands which are barely above river level the draining of these lands can take some considerable time, often months as the water slowly percolates through to the river. The removal of the land to act as a slow-release of these waters will exacerbate problems elsewhere in the village to the detriment of other residents and road users.

The village has been completely isolated from all other surrounding villages by road and rail during periods of exceptionally wet weather for several days at a time, this was almost unheard of until 3-4 years ago. However, the rail line rail does appear to have closures of 24hr or more at least once a year resulting in Network Rail installing 2 large pumps which run continuously for extended periods to alleviate the flooding problems.

1. Effects of major population increase on village life:

The nature of this semi-rural village will change to become more that of a small town. There is no evidence that the additional population will use the local shops as the likely residents of this site would own cars and be of an age where they commute to work and would almost certainly frequent the larger supermarkets. Many of the existing residents chose to move to Draycott for its village feel as they wanted something a bit quieter and slower than the life experiences offered by larger towns and cities which is unlikely to be a major appeal to the new, younger residents.

1. Inappropriate development in an inappropriate location:

The suggested development of 40% affordable housing (76 homes), terrace housing etc. would be incongruous in this setting alongside larger detached homes on Derby Rd. and is therefore not felt to be appropriate.

Draycott already has a large amount of affordable housing on St. Mary’s Court, The Green, Cowslip Meadow, Wallis Close, Walter St etc.

As previously stated, the residents of this development will almost certainly be of working age yet virtually none will work within the village or even the surrounding villages, they will all require to commute to the larger centres of employment such as Derby, Nottingham, Long Eaton and so-on. It would seem far more sensible to reduce the commuting and house them closer to their likely places of employment and in areas with a larger and younger population for them to integrate.

The proposed development in Draycott offers a disproportionately large development relative to its existing population when compared with all other Erewash towns and villages. As a proportion of the existing population the additional housing adds a relative additional burden of 0.0841 additional houses per current resident; this compares with 0.0197 for Sandiacre and 0.202 for Breadsall.

1. Choice of site:

The procedure that appears to have been followed in the Sustainability Review is somewhat arbitrary. The sustainability appraisal objectives appear to use an arbitrarily assigned value to determine the suitability of a site for further consideration. These values can vary widely depending on who assigns them and what knowledge of an area they have. In a random assessment we achieved an extremely wide variation of numerical outcomes and all from long-time Draycott residents who knew the area very well. Such a method of determination must be questionable and viewed as subjective.

There are over 100 brown field sites within Erewash and that there are existing permissions for over 1000 homes on these and yet little or nothing appears to be being done to develop them. Given the government’s stated goal of using brown field sites first and that these are mostly located in or near the larger towns and conurbations which is where most of the health, education and employment provision is to be found, it would seem sensible to progress with these first. Villages such as Draycott should by EBC’s own methods come no higher than seventh out of eight in order of preference.

1. New high voltage transmission lines:

The site is at the confluence of the river Derwent, the Derby and Sandiacre canal, main line rail, a significant A road and proposed new 75m high voltage transmission lines. The preferred corridor for the new transmission lines must pass over the canal, the rail line and river at this point. Unless the cables are underground prior to crossing the first two obstacles they would require undergrounding close to the entrance to the site but then emerge to go overground to ford the river. This still leaves the lines exposed and within close proximity to homes. The alternative is to divert the transmission route or take them under the river also which seems unlikely.

In addition, enclosed is a 10 page document from Michael Evans and Associates which is an independent Flood Risk and Drainage Review of the proposed housing allocation site at Draycott which we would like considered as part of our objections.

With best regards



Sheena Butcher

On behalf of Draycott and Church Wilne Parish Council