

9th June 2026

Planning Team,
Erewash Borough Council,
Town Hall,
Long Eaton,
Nottingham,
NG10 1HU

Dear Sir/Madam

**Consultation Response for Planning Application PA/2026/0189
Outline Application for Development of up to 100 Dwellings and associated
infrastructure, with all matters reserved except for access from Draycott Road**

Breaston Parish Council welcomes the opportunity to comment on the above application and wishes to register a formal objection to the proposal. The Parish Council considers that the application conflicts with established planning policy, represents inappropriate development within the Green Belt, fails to adequately address significant flood risk concerns, and would place unacceptable pressure on local infrastructure and services. Furthermore, the proposal cannot be properly considered in isolation from the wider landholding controlled by the applicant, which has previously been promoted for substantially larger-scale residential development.

The Council therefore respectfully requests that planning permission is refused for the reasons set out below.

1. Conflict with Established Spatial Strategy

Whilst this application seeks permission for approximately 100 dwellings, the site forms part of the substantially larger SHLAA 2022 Site Reference 240, which was assessed in its entirety through the Council's Core Strategy Review process. The Council's own assessment concluded that the wider site was unsuitable for residential development, identifying Green Belt designation as a primary constraint. The review also concluded that development of this scale would represent a significant and disproportionate enlargement of Breaston and would place unacceptable pressure on local services and infrastructure. More sustainable locations for growth were identified elsewhere within the Borough. Although the current proposal relates to a smaller parcel of land, the planning principles underpinning the previous assessment remain highly relevant. The Parish Council is concerned that the application represents an attempt to incrementally

develop a site that has already been considered unsuitable for residential development through the strategic planning process. The Council therefore considers that approval of this application would conflict with the established spatial strategy for the Borough.

2. Inappropriate Development within the Green Belt

The site remains designated Green Belt and is identified within the SHLAA as greenfield land in agricultural use.

Erewash Borough Council has not altered the site's designation to Grey Belt and therefore Green Belt policy protections continue to apply. Development within the Green Belt is, by definition, inappropriate unless very special circumstances can be demonstrated.

Previous proposals affecting this site have been refused on Green Belt grounds. The Parish Council does not consider that the applicant has demonstrated any very special circumstances sufficient to outweigh the substantial harm arising from inappropriate development within the Green Belt.

The Council further notes that any loss of Green Belt land would be permanent and would contribute to the erosion of the open countryside setting and semi-rural character that defines Breaston.

3. Fragmented Planning and Cumulative Impact

The Parish Council is concerned that this application represents a clear example of fragmented planning.

The former school site sits within a much larger landholding extending from Draycott Road to the south to the canal footpath to the north. The Council notes previous indications that development of the school site could act as a gateway proposal facilitating future development of up to approximately 600 dwellings across some 36.994 hectares of land under the applicant's control.

The scale of some of the supporting technical reports further reinforces concerns that the application forms part of a wider masterplan. Certain highway and infrastructure elements appear capable of serving development significantly larger than the 100 dwellings currently proposed.

By submitting only a small proportion of the wider site, the applicant avoids proper consideration of the cumulative environmental, infrastructure and community impacts that would arise from the full development potential of the landholding. The Parish Council considers that strategic growth of this scale should be assessed through the Local Plan process rather than through piecemeal applications that fail to address cumulative impacts.

4. Flood Risk and Drainage

Flood risk remains one of the Parish Council's most significant concerns.

Previous development proposals affecting this wider area have been refused on flood risk grounds. In recent years, a considerable number of properties surrounding the site have experienced flooding during multiple events, including significant incidents in both 2023 and 2024.

The applicant's own Hydraulic Modelling Study acknowledges that flood risk currently exists on the site and further recognises that climate change is likely to increase both the frequency and severity of flooding by approximately 30% over the coming decades.

Whilst the study suggests that development may be accommodated on higher areas of land, this would result in housing being located on relatively isolated areas within a wider flood-prone landscape, raising significant concerns regarding long-term resilience and safety.

The Parish Council is concerned that the submitted Flood Risk Assessment and Hydraulic Model contain significant omissions and inaccuracies, including:

- Failure to adequately reflect the flooding associated with Storm Babet in 2023, during which 49 neighbouring properties were affected and flood depths of up to 800mm were recorded on Gregory Avenue and Hind Avenue.
- Failure to adequately consider sewer flooding, despite Derbyshire County Council's Section 19 Report identifying sewer surcharge as a contributory factor in the 2023 flooding events.
- Failure to undertake a blockage analysis of the Golden Stream box culvert beneath Draycott Road, despite the presence of flow restrictions and infrastructure that are vulnerable to blockage, and which may represent a significant hydraulic constraint.
- Failure to fully assess the displacement of floodwater resulting from proposed land raising and the associated loss of floodplain storage.
- Insufficient assessment of surface water runoff, increased hardstanding, and the cumulative impacts upon neighbouring residential properties.
- Reliance upon drainage solutions that may prove unworkable given the site's known high groundwater levels and seasonal water table conditions.
- Apparent inconsistencies regarding whether aspects of the modelling were based upon 75 dwellings rather than the approximately 100 dwellings currently proposed.

The proposed flood attenuation pond is also a cause for concern. The Parish Council considers that the submitted information does not clearly explain how the feature would function in practice, nor how it would be integrated into the wider drainage strategy for the site. In addition, there is insufficient clarity regarding long-term ownership, management, and maintenance responsibilities for this infrastructure following completion and occupation of the development. Given the critical role such a facility would play in managing flood risk, the Council considers that these matters must be fully resolved and secured through appropriate legal

and maintenance arrangements before any planning permission could be considered acceptable.

The Parish Council also notes that land to the east of the site appears not to have been fully considered within the submitted flood assessments.

Furthermore, residents have reported ongoing operational concerns regarding the emergency sluice gates south of the village. Concerns have been raised that the automatic operation of these systems is unreliable and that residents are required to notify the relevant authority during periods of high water.

The Council is therefore not satisfied that the applicant has demonstrated that the development can be undertaken safely without increasing flood risk elsewhere, as required by national planning policy.

The Parish Council considers that development of the former school site could only potentially be contemplated if the remaining land under the applicant's ownership were permanently secured as managed wetland, flood storage, or flood attenuation land maintained in perpetuity by the developer. Alternatively, the land should remain in managed agricultural use.

The Council further notes that the applicant, and its predecessor landowners, have controlled this land for over thirty years yet there is limited evidence of proactive flood mitigation measures having been implemented for the benefit of existing residents.

5. Biodiversity and Ecology

The Parish Council considers the submitted Biodiversity Net Gain assessment to be fundamentally flawed.

Significant site clearance, including removal of ancient hedgerows and trees and wildlife habitat, took place during early 2025 which the Parish Council reported to the Planning team at the time. The biodiversity assessment was subsequently undertaken several months later.

The Council is concerned that the assessment does not reflect the site's ecological value prior to clearance and therefore risks understating the true biodiversity baseline. This appears inconsistent with the requirements of Schedule 14 of the Environment Act 2021, which requires biodiversity calculations to be based on pre-degradation conditions.

Despite the clearance works, the site remains an important habitat for local wildlife and forms part of a valued landscape enjoyed by users of the adjacent Public Right of Way and local residents.

The Council further notes that no comprehensive wildlife survey appears to have been submitted in support of the application.

Should development proceed, any Biodiversity Net Gain must be delivered on-site and should demonstrate genuine ecological enhancement rather than reliance upon off-site offsetting.

6. Impact on Village Character and Visual Amenity

Breaston is a historic village with origins recorded in the Domesday Book.

The Council's previous assessments have already concluded that development within this area would result in a significant enlargement of the village and would erode its established semi-rural character.

The proposal would result in the loss of open countryside views currently enjoyed from public footpaths and surrounding areas and would significantly alter the character of this important gateway into the village.

The Parish Council considers that the proposal would cause substantial harm to the visual amenity, landscape character and historic identity of Breaston.

7. Infrastructure, Education and Healthcare

The cumulative impact of development upon local infrastructure is a matter of serious concern.

Breaston currently has a population of approximately 4,500 residents. The proposal for 100 further dwellings could increase the village population anything from 100 - 400 additional residents which would place additional pressure on infrastructure that residents already consider to be operating under strain.

Particular concerns include:

- Capacity at local primary schools and secondary schools.
- The reduction of the Wilsthorpe School catchment area and concerns regarding future access to school places for Breaston children.
- Existing pressures upon GP surgeries, dental practices and healthcare provision.
- Capacity of local shopping facilities and community services.

The Parish Council is not satisfied that adequate evidence has been provided to demonstrate how these impacts would be effectively mitigated. In particular, there is a notable absence of any proposed mitigation in relation to the anticipated additional pressure on local GP and dental services, with no clear strategy identified to address increased demand on healthcare provision. The only mitigation referenced within the submission relates to education provision through Section 106 contributions, which in the Council's view does not adequately address the full range of infrastructure and service pressures arising from the proposed development.

8. Traffic, Access and Highway Safety

Residents have raised significant concerns regarding traffic generation, highway capacity and pedestrian safety.

Existing assessments indicate that the Bostocks Lane junction is already operating at or above capacity. Residents also note that a previous proposal for access in a similar location made by the County Council when the site was operating as a

school was refused and that traffic conditions have worsened significantly since that decision was made.

Particular concerns include:

- An estimated increase of approximately 760 vehicle movements per day.
- Existing speeding issues along Draycott Road.
- The suitability and safety of the proposed access arrangements.
- Pedestrian safety, particularly for children travelling to Firfield Primary School.
- The narrow footway along the northern side of Draycott Road, which is further constrained by vegetation growth.

The Parish Council considers that significant highway improvements, traffic calming measures and safe crossing facilities would be essential should development ever proceed.

9. Accuracy and Reliability of Submitted Reports

The Parish Council is concerned by a number of apparent inaccuracies and references within the submitted documentation that do not appear to relate to the application site or its immediate surroundings. In particular, reference is made to Bagthorpe Brook, a watercourse located approximately 17 miles from the application site, together with other examples of generic or location-specific text that appears inconsistent with the Breaston context.

The cumulative effect of these errors gives the impression that elements of the supporting documentation may have been derived from reports prepared for other sites and not comprehensively updated for the specific circumstances of this application, which further undermines confidence in the conclusions reached. The Parish Council therefore requests that the Local Planning Authority carefully scrutinise the submitted reports and seek clarification from the applicant where inconsistencies or references to unrelated locations are identified.

10. Public Consultation and Accessibility of Information

The Parish Council is concerned that meaningful public engagement has been hindered by difficulties accessing information relating to the application.

Residents have reported that searches using the application reference number have not consistently returned results on the planning portal and that the proposal has not appeared correctly within the planning mapping system.

Concerns have also been raised regarding the visibility of site notices and whether all public comments have been properly acknowledged.

The Council believes that public confidence in the planning process depends upon full transparency and accessibility of information.

Therefore the Parish Council organised a public meeting on 2 June to allow residents to raise concerns and make comments regarding the application.

Approximately 200 residents were in attendance, and the issues raised at that meeting are reflected within the responses set out in this representation.

Conclusion

For the reasons outlined above, Breaston Parish Council respectfully requests that planning permission is refused.

The proposal represents inappropriate development within the Green Belt, conflicts with established planning strategy, raises serious unresolved concerns regarding flood risk and drainage, relies upon a disputed biodiversity baseline, would harm the character and appearance of the village, and would place significant pressure upon infrastructure and services that are already operating under strain.

The Council further considers that the application has not adequately assessed the cumulative impacts associated with the wider development potential of the surrounding landholding and that approval would establish a precedent for incremental development contrary to the strategic planning objectives previously adopted by the Authority.

Should the Local Planning Authority nevertheless be minded to approve the application, the Parish Council requests that the matters identified within this representation are fully addressed through robust planning conditions and legally binding obligations.

Yours faithfully,



Nicala O'Leary
Clerk/Responsible Financial Officer
Breaston Parish Council