



**BULCOTE PARISH COUNCIL'S SUMMARY of OBJECTIONS to  
PLANNING APPLICATION for BULCOTE FARM RE-DEVELOPMENT Ref:  
15/00784/FULM, 15/00784/LBC, 17/02325/FULM**

Bulcote Parish Council with the support of the village community, have continually raised objections to these applications in response to the various revisions and further information submitted by the applicant. In response to the recent amendment to the proposals to reduce the extent of Enabling Development we considered it appropriate to summarise all of our previous comments.

***Planning Policy***

Bulcote is within the Nottingham Fringe Area being part of the Green Belt protected from inappropriate development, but facilitating development to meet local needs without promoting levels of development which would result in an increase in commuting to Nottingham.

Spatial Policy 4B of the Amended Core Strategy (March 2019) – Green Belt Development – advises that new housing development should be focused on principle villages e.g, Lowdham and the part of Bulcote attached to Burton Joyce. The latter having now been absorbed by the McCarthy Stone development of 42 retirement apartments and is therefore unavailable.

Bulcote has been identified in the Amended Core Strategy as an area where consideration will be given to the development of “Rural Affordable Housing Exception Sites”, but proposals should be small scale in nature and not have a detrimental impact on the character of the village or openness of the Green Belt.

The proposed development is contrary to any of the above policies: -

- There is no local need for any such development and if permitted would increase commuting to Nottingham
- It is not within the area attached to Burton Joyce.
- It is far from being a small-scale development and it would have a detrimental impact on the village Conservation Area and the openness of the Green Belt.

### ***Enabling Development***

The justification for the extensive new build is based entirely on reference to Historic England's guidance document "Enabling Development and The Conservation of Significant Places". The applicant has however been selective in quoting from this document and has ignored for example clause 4.3.6 "Enabling development should always be seen as a subsidy of last resort, since it is an inefficient means of funding a conservation deficit.....".

Clause 5.17.4 also states that Local authorities should ensure that the case is based on the needs of the place, not the owner. In this regard we believe the owner Midland Land Portfolio (a subsidiary of Severn Trent Water), are seeking to use Enabling Development for commercial gain, by maximising the sale value of the site with planning permission.

The Policy of Enabling Development requires seven criteria to be satisfied. The applicant sought to prove that these criteria had been met in their Enabling Development Executive Summary dated July 2018. Bulcote Parish Council submitted their response to this in a document dated 29<sup>th</sup> August 2018 and contested each of the seven policy statements and demonstrated that they did not satisfy the criteria in Historic England's guidance. This we feel was supported by Historic England who have commented that the development ".....will fundamentally change the agricultural character of the farmstead through domestication and intensity of use." And the terrace housing in particular ".....will harm the appreciation and understanding of the significance of the model farm, which in part is derived from its agricultural setting and direct, uninterrupted relationship with the rural landscape." They also state that "On the basis of the submission, we believe this proposal is harmful to the significance of the designated heritage asset." The Victorian Society also support this argument in their response dated 22<sup>nd</sup> July 2015 and state "....we remain unconvinced that the application provides the information necessary to establish the principle of enabling development." And "..... we urge you to refuse this ill-justified application consent."

The original Viability Assessment Report dated April 2015, to justify the costs of the Enabling Development, quoted a conservation deficit of £2.86 million and determined that 48 new build dwellings would be required to convert the 24 dwellings in the existing buildings. The recent Viability Addendum Assessment Report (October 2019) now appears to quote a conservation deficit (Heritage Deficit Conversion) of £2.08 million and a requirement of 41 new build dwellings to convert the 24 dwellings. Quite how there can now be a reduction in the conservation deficit for converting the same building is unclear and why there is a reduction of 27% in the conservation deficit, but only a 15% reduction in the enabling development seems anomalous. Moreover, it is questionable as to why there is a conservation deficit at all when the applicants own Elemental Defect Appraisal Survey produced by Shepard Myers in October 2012 states that the conversion of the existing buildings should be no more than the cost of new build. It might be argued that as this report is now some nine years old, the submission of an updated version might be expected, but then this would likely go against the applicant's strategy if the same conclusion were to be reached; in that the buildings are structurally sound and not in need of extensive repair.

The Parish Council have recently become aware of a project near Lincoln at Bracebridge Heath, North Kesteven; where the derelict St John's Hospital is being converted to 107 dwellings with an "enabling development" of 79 new build dwellings. The new build is not described as "enabling development" by the applicant and there is no viability assessment to justify it as such. The existing building is in

extremely poor condition with extensive rot in the floor, roof timbers and window frames together with missing leadwork and partial structural collapse. All of which is a matter of record and can be viewed on North Kesteven's planning portal. Yet despite the dilapidated state of the existing building the ratio of newbuild to conversion is 74%. This compares to a ratio of 171% at Bulcote Farm where the condition of the existing buildings is far better.

*Bulcote Parish Council believe that the case for Enabling Development has not been made and this is supported by Historic England and The Victorian Society. The arguments put forward by the applicant are flawed and skewed towards the desired outcome which is for commercial gain in the sale of the site.*

### **Highway Access and Rail Crossing**

The development site can only be accessed by traffic and pedestrians in one direction which is through the village and across a level crossing. Notts CC Highways have rejected the applicant's proposals to improve pedestrian access as being sub-standard and similarly the available road width does not comply with current guidelines. Furthermore, no consideration has been given to the fact that residents of cottages on this particular section of road have no provision for off street parking and as such the road is effectively a single carriageway.

Network Rail have identified the crossing as borderline high risk, but have implied that the risks posed by increased traffic can be mitigated by additional signage and yellow cross hatching either side of the crossing. This solution is considered totally inappropriate as it would be contrary to the road's character and setting within the Conservation Area and would preclude residents parking outside of their property as referenced above.

Notwithstanding the above, no consideration appears to have been given to the fact that the crossing is regularly closed for maintenance with no access for vehicles or emergency services and occasionally pedestrian access is prohibited, as was the case reported recently.

*Bulcote Parish Council support Notts CC Highways objection to the proposals.*

### **Sustainability**

According to the 2011 census Bulcote had a population of 309. This development together with the permission already granted for 42 retirement apartments – the majority of which are two bedroomed – would potentially increase the population to an estimated 550+, an increase of some 80%. Given that Bulcote has no schools, shops, healthcare facilities etc this increase would place an excessive burden on the local villages of Burton Joyce and Lowdham where schools and healthcare provision are already strained.

The location of the development in relation to local amenities and public transport exceeds the recommended distances for journeys on foot which will inevitably lead to increased traffic flow through the village and along a highway access deemed unfit for the size of development. Traffic flow to and from the development will be compounded by the fact that it can only access and egress in one direction. Notwithstanding that the distance to the nearest bus stop exceeds that recommended for access on foot the majority of the route would be along roads with no footpath and to create one would be contrary to its character and setting within the Conservation Area.

To allow such a large development with its own green space surrounded by residential property and its own recreation area and community facility is likely to fragment the village.

*Bulcote Parish Council do not believe the proposals meet the criteria for sustainability.*

### ***Flooding and Drainage***

It is acknowledged that the development will ultimately require the approval of the Environment Agency, the Local Lead Flood Authority and Severn Trent Water. Nevertheless, there appear to be some shortcomings in the proposals submitted.

In the Flood Risk Assessment there is reference to a flood action plan and safe access and egress routes to areas of higher ground. It does not state however, who will prepare the flood action plan and how the safe routes will be defined.

The drainage scheme provided is an over simplification in that it shows flows directed north towards the railway where there are no public sewers. Surface water south of the railway discharges to the drainage ditch that is managed by Trent Valley Internal Drainage Board. Whilst attenuation tanks are shown to restrict the flow, they are located close to the existing buildings and where they could destabilise the existing foundations. Moreover, one is shown in the location of the existing weighbridge.

Discharge of surface water from the development into the existing drainage ditch is of concern as, during a severe storm, this could surcharge the ditch and restrict upstream flows. The village is sensitive to flows in the ditch and flooding of property occurred in 2007 and again recently during the period of excessive rainfall.

Similarly, there is no public foul sewer and existing foul flows are believed to go to a private pumping station.

### ***Conclusions***

Bulcote Parish Council support the renovation of the existing Bulcote Farm buildings, but together with the village community and Historic England, object to the extensive Enabling Development.

The Parish Council were well represented at the Planning Committee meeting in February 2019 and were disappointed that the recommendation for refusal on the grounds of highway access was not carried. As we understood it the reason for a deferral was to allow N&SDC to determine a more robust objection other than just highway access. We are now led to believe that this was not how it was recorded in the minutes and the reason for deferral was to allow the applicant time to reconsider the extent of the enabling development. Given that this application was first submitted in 2015 we would have thought the applicant could have been advised of this some years ago.

**BULCOTE PARISH COUNCIL**

**28<sup>th</sup> November 2019**