

SUBMISSION BULCOTE NEIGHBOURHOOD PLAN Representation Form

This form should be used to comment on the Submission Bulcote Neighbourhood Plan. If you wish to comment (known as making a representation) completed Representation Forms should be returned by email to planning.policy@nsdc.info or by post to: Planning Policy, Newark & Sherwood District Council, Castle House, Great North Road, Newark, NG24 1BY by **5pm on 24th October 2019**.

Please note that all respondents must complete their personal details as it is not possible for representations to be considered anonymously. Respondents should also note that representations are not confidential and that they will be published on the Newark & Sherwood website and copies will be placed at appropriate venues across the District for public inspection (we will redact email and telephone numbers however). Further copies of this form can be obtained by downloading at:

<https://www.newark-sherwooddc.gov.uk/planningpolicy/neighbourhoodplanning/>

or by telephoning us on 01636 650000.

Your **Contact Details:**

Name:

Organisation: Northern Trust Company Ltd and Severn Trent Water Limited

Address: c.o Agent

Postcode:

Email address:

Telephone:

If you have appointed someone to act on your behalf please enter their details here:

Name: A Key

Organisation: Savills (UK) Ltd

Address: Savills (UK) Ltd, Ground Floor, City Point, 29 King Street, Leeds

Postcode: LS1 2HL

Email address: akey@savills.com

Telephone: 01132201278

Please enter your comment or comments on the Submission Bulcote Neighbourhood Plan, together with any suggested amendments below. For each comment made, please indicate to which part of the plan the comment relates (e.g. policy, chapter and/or paragraph number).

Please refer to attached letter

Please indicate if you wish to be notified that the District Council intends to ‘make’ (formally adopt) the Bulcote Neighbourhood Plan subsequent to examination and referendum.

Privacy Notice

The Council is carrying out a public consultation exercise on behalf of Bulcote Parish Council in relation to the Neighbourhood Plan which has been submitted. As you have been consulted at an earlier stage the Parish Council have provided your details to enable us to undertake this consultation. The basis under which the Council uses personal data for this purpose is a Statutory Requirement.

The information that you have provided will be kept in accordance with the Council’s retention schedule, which can be found at <https://www.newark-sherwooddc.gov.uk/dataprotection/>

23 October 2019
Bulcote Neighbourhood Plan- Submission Draft



Planning Policy Business Unit
Newark & Sherwood District Council
Castle House
Great North Road
Newark-on-Trent
NG24 1BY

Adam Key
E: akey@savills.com
DL: +44 (0) 113 220 1278

Ground Floor
City Point
29 King Street
Leeds LS1 2HL
T: +44 (0) 113 244 0100
F: +44 (0) 113 244 0104
savills.com

By Email only

Dear Sirs,

Bulcote Emerging Neighbourhood Plan – Submission Draft

These representations have been prepared by Savills (UK) Ltd on behalf of Severn Trent Water Limited, Midlands Land Portfolio Limited and their planning promotion partner Northern Trust Company Limited in response to The Submission Draft Bulcote Neighbourhood Plan, submitted to Newark and Sherwood District Council in September 2019.

As you may be aware, Savills act on behalf of Midlands Land Portfolio (Northern Trust Company Ltd and Severn Trent) regarding the land and buildings at Bulcote Steading. The comments that follow relate to the submission Draft Bulcote Neighbourhood Plan and are made in the context of our clients interest at Bulcote Steading.

Severn Trent Water Limited have previously made formal and informal representations to the Neighbourhood Plan Forum at various consultation stages. Many of our clients comments, specifically in relation to proposed Local Green Space 'Site 4' from previous consultations still stand, and are set out in detail within these representations.

Bulcote Steading

Bulcote Steading is a nationally important Grade II Listed farm complex in Nottinghamshire. The buildings have a collective group value demonstrating a fine example of a very late model farm within the English Model Farm Movement (1700- 1914). Being Grade II Listed, Bulcote Steading is a heritage asset of significance and national importance. The farm buildings were listed Grade II in February 2005 along with the adjacent Field House and Corporation Cottages. Although not specified on the list entry, these buildings have a degree of group value and a relationship in terms of their location and setting.

The design of Bulcote Farm is based around a quadrangle with several ranges of buildings which previously provided housing for cows, pigs and horses as well as food storage. The last of the dairy herd moved out of the complex in early 2013. The site is now predominantly vacant with the exception of a small farm office, some leased stables and the use of the manager's office (Bulcote Farm Rooms) for Parish Meetings.



The designation of Local Green Space Site 4 does not accord with the criteria set out in Paragraph 100 (b) of the NPPF or the relevant NPPG

Savills have previously submitted comments regarding the Local Green Space Designation identified as 'Site 4' within Section 13 of the Draft Neighbourhood Plan. These comments were made to the Chairman of the Bulcote Neighbourhood Plan Steering Group and summarised that the draft Local Green Space does not meet the requirements of National Planning Policy and as such should not be included as a Local Green Space within the Neighbourhood Plan. We are disappointed to note that these comments have not been taken into account in this most recent Submission Draft Neighbourhood Plan.

Part 13 of the Submission Draft Neighbourhood Plan seeks to designate Local Green Spaces across the Village, to identify areas of 'value' to local people. The sites designated as Local Green Space are identified on Map 17.

Draft Neighbourhood Plan Policy NPP4 reads:

'The sites identified in Map 17 are designated as Local Green Spaces and are protected for their beauty, recreational value, tranquillity and richness of wildlife'

This policy restricts any development which would have an adverse effect on the openness or special character of these Local Green Spaces, except in very exceptional circumstances (in accordance with National Policy) or if the development clearly enhances the Local Green Space for the purpose for which it was designated

Site number 4 has been identified as the *'Field Boundary in front of the Grade II listed Corporation Cottages with the arable land beyond'*. The site is a long, linear strip located directly adjacent to Old Main Road to the west and bound to the east by a hedgerow and field boundary. The site is intersected by an open drain. The site description suggests that it extends to approximately 0.9ha.

The draft Bulcote Neighbourhood Plan describes Site 4 as *'The open field boundary with views to the arable land beyond are character forming and are an important and strong element that describes the transition from built village to farmland. The open views are especially valued by homeowners and the large number of cyclists, walkers and horse riders that use this route to the River Trent.'* The site is owned and managed by Severn Trent Water. The land included as 'Site 4' is within the Conservation Area of the village and is within the Green Belt.

The NPPF¹ advises that Local Green Spaces should be used to identify and protect green areas of particular importance to a community through the Local and Neighbourhood Plan mechanisms. The NPPF² clearly states that the designation of Local Green Space should not be considered without suitable and substantial justification (our emphasis). It puts policies for managing development within a Local Green Space as consistent with those for the Green Belt². This can be considered a very high threshold to reach. And given that the Site number 4 is already located within the Green Belt, we consider it is already sufficiently protected.

Furthermore, the NPPF³ is clear that a Local Green Space designation should only be considered where the green space meets all of the following criteria:

- Is in reasonably close proximity to the community it serves;
- Is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- Is local in character and is not an extensive tract of land.

¹ National Planning Policy Framework (2019) Paragraph 99

² National Planning Policy Framework (2019) Paragraph 101

³ National Planning Policy Framework (2019) Paragraph 100

Planning Practice Guidance relating to Open Space, sports and recreation facilities public rights of way and local green space, suggest that Local Green Space designations should be utilised as a method of providing special protection against the development of green areas of particular importance to local communities. The PPG⁴ reinforces this, stating that if land is already protected by Green Belt Policy, consideration should be given to any additional local benefit of designating land as Local Green Space.

The Neighbourhood Plan⁵ assess Site 4 against the Local Green Space criteria in the NPPF, the justification for the designation states:

'It is in close proximity to the community and highly valued by them. The open nature of the views add to the landscape value and reinforce the character of Bulcote. It is not an extensive tract of land'

However, from an objective assessment against the criteria of the NPPF, it is clear that Site 4 does not fit the description of a Local Green Space and as such should not be considered as a draft designation.

The NPPF⁶ specifies that to be considered as a Local Green Space, a site must be 'demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife'

The site consists of a grass verge located between the road and a drain and an area of grass and trees between the open ditch and the field boundary hedge. In itself, the site cannot be considered to be tranquil or beautiful, given that both of these aspects are compromised by its proximity to the adjoining road.

The Submission Draft Plan states that the site is highly valued due to its open nature and its contribution to landscape value. However, the area of land considered for Site 4 is not critical to retaining openness or any specific viewpoints. The proposed allocation only extends as far as the field hedge and as such makes a minimal impact on openness in the context of the farmland beyond.

Key View 8 as identified on Map 16 is taken from Site 4 and the Corporation Cottages to the west. However, the Green Belt designation which covers the site, is sufficient protection to ensure that the view is not impacted, and the field beyond, which arguably is key to the viewpoint, will not be developed. We feel Site 4 should be deallocated given the minimal impact it makes on retaining this view and in consideration of the other, stringent, criteria required for the designation.

The size and nature of the site restricts its recreational value, as does its proximity to Old Main Road. It cannot be considered an open space fit for recreational use and as such cannot be considered as being of particular local significance based upon its recreational value to the local community. Further there is no evidence to support that it is physically used by the local community for any recreational purpose. The parcel of land is private land which is occasionally mown by the Farm Manager of Severn Trent Water.

A desk top analysis based upon Magic Ecology Maps by DEFRA does not highlight any ecological designations or habitats on the site. Given it is a thin strip of grass verge with some trees, the site can not be considered to be rich in terms of wildlife.

⁴ Paragraph: 010 Reference ID: 37-010-20140306 Revision date: 06 03 2014

⁵ Submission Draft Neighbourhood Plan page 42

⁶ National Planning Policy Framework (2019) Paragraph 100 (b)

In summary, to apply an additional designation to identify the site as a Local Green Space is unnecessary, given the location of the site within the Green Belt, which already restricts development proposals impacting on the site, unless 'exceptional circumstances' can be demonstrated. In addition, the site can in no circumstances be considered to accord with paragraph 100(b) of the NPPF or the relevant guidance set out in the NPPG and as such its designation as a Local Green Space should be removed.

The designation of Local Green Space Site 4 will restrict Development at Bulcote Steading Contrary to Paragraph 184 of the NPPF

As the Council are aware, Northern Trust are progressing a heritage linked planning application at Bulcote Steading. Three applications have been submitted relating to the site (15/00784/FUL, 15//00785/LBC & 17/02325/FUL). These collective applications cover an area of the Bulcote Steading site extending to 5 hectares.

The most recent proposals for the site are the result of extensive liaison, consultation and negotiation with the Local Planning Authority and Conservation Officers at Newark and Sherwood Council. It has been concluded through the course of the application that some development must be delivered at Bulcote Farm to preserve its historic fabric. NSDC Conservation officers have assessed the proposals, concluding in their most recent comment on the application that the proposal *'sustains the special interest of the listed building complex and accords with paragraph 202 of the NPPF'*. The response also makes reference to the enabling development proposed *'We consider the enabling development to be justified in this case, and feel that the proposal will cause no harm to the setting of any designated heritage asset in this case. The proposal is considered to be the optimum viable use of the site in this case.'*

We are clearly aware of the Parish Council's objection to these proposals. However, even the Parish Council are on record as stating they would support a proposal which solely proposed the conversion of the listed buildings to residential use.

The NPPF advises that heritage assets are an irreplaceable resource and gives great weight to their conservation. Securing a sustainable long-term future for the Grade II Listed farm for future generations is a very substantial public benefit to which great weight must be given in decision-making. It is therefore reasonable to suggest that development of some description will come forward on the site. The access arrangements to any form of development at Bulcote Steading would require some of this verge land to improve the access. Whilst the development proposals for Bulcote Steading are yet to be determined, it is clear that Site 4 has the potential to frustrate the delivery of a proposition which will ensure the long term future of the listed buildings. There is a clear conflict between this draft policy and national and local policy which seeks to protect and enhance heritage assets. The Parish Council have been consistent objectors to the proposals at Bulcote Steading, but do recognise that 'something has to happen'. To this end it is important to acknowledge the farm complex at Bulcote Steading has development potential and in order to secure the future of the listed buildings some form of development is inevitable. The Parish Council has acknowledged this in discussions to date. It is therefore imperative that any LGS proposals do not hinder the potential redevelopment of the Bulcote Steading site. The current proposed LGS allocation would undermine this objective. In order to enable a development to progress it is imperative, at the very least, that the land between the road and the ditch is removed from the LGS proposal.

Designating Site 4 as Local Green Space will significantly constrain the proposed development at Bulcote Steading and will put the long term future of the Heritage Asset at risk, contrary to paragraph 184 of the NPPF. The designation of Site 4 as a Local Green Space is not justified or effective in the context of paragraph 35 of the NPPF and as such does not meet 'basic condition A' of the relevant NPPG. In addition, there is a clear conflict between Site 4 and the NPPF and NPPG objectives of ensuring the long term future of heritage assets.



Concluding Comments

As outlined above, the proposed Local Green Space designation at Site 4 within the Submission Draft Bulcote Neighbourhood Plan in our opinion is unnecessary given its location within the Green Belt and unjustified since the site does not meet the necessary criteria set out in the NPPF. It would also prejudice the long term future of important listed buildings irrespective of the specific development proposal. In this regard the proposed designation is also contrary to the NPPF.

As a result, we respectfully request that the proposed Local Green Space designation for Site 4, located to the east of Old Main Road is removed.

Yours sincerely

Savills

Savills (UK) Limited