



**PLANNING APPLICATIONS WEEKLY LIST NO.1711**  
**Week Ending 17th May 2024**

**NOTE:**

- (i). Decision Notices will be issued in accordance with the following recommendations unless **ANY MEMBER** wishes to refer any application to the Development Committee on the 27<sup>th</sup> June 2024
- (ii). Notification of any application that is to be referred must be received no later than 1:00pm on Wednesday **22nd May 2024** this needs to include the application number, address and the planning reasons for the referral via email to the PBC Technical Support team [pbctechnicalsupport@rochford.gov.uk](mailto:pbctechnicalsupport@rochford.gov.uk) .If an application is referred close to the 1.00pm deadline it may be prudent for a Member to telephone PBC Technical Support to ensure that the referral has been received prior to the deadline.
- (iii) Any request for further information regarding applications must be sent to Corporate Services via email.

**Note**

Do ensure that, if you request a proposal to go before Committee rather than be determined through officer delegation following a Weekly List report, you discuss your planning reasons with Emma Goodings Director of Place. A planning officer will then set out these planning reasons in the report to the Committee.

Index of planning applications: -

1. 20/00450/FUL - Site Of Bullwood Hall Bullwood Hall Lane Hockley  
PAGES 2-21

Application No:	20/00450/FUL      Zoning: Metropolitan Green Belt
Case Officer	Mr Arwel Evans
Parish:	Rayleigh Town Council
Ward:	Trinity
Location:	Site Of Bullwood Hall Bullwood Hall Lane Hockley
Proposal:	Demolition of the existing vacant building and erection of 6no. residential apartments with associated car parking, cycle storage and landscaping.

## **SITE AND PROPOSAL**

1. The application site relates to Bullwood Hall and its immediate curtilage which once formed part of her Her Majesty's Prison Bullwood Hall located south of High Road and adjoining Hockley Woods. Bullwood Hall, formerly known as Bullwood House, was built in 1887 as a substantial gentleman's residence for Mr. S. S. Baker. The building was comprised of three storeys with a single storey flat roofed entrance porch on the principal north elevation. A clay tiled roof, yellow brickwork with red brick detailing, painted render and exposed timbers are all features typical of a building of this nature in the late 19th century.
2. Bullwood House was renamed Bullwood Hall in 1962 following the construction of the prison to the east, first used as a female borstal. The house was then used to accommodate around 20 prison officers. The submitted application illustrates the building in its original form and it now exists unoccupied and in a state of some disrepair. .
3. The site is accessed from a junction made with High Road 390m west of the junction made with Fountain Lane. Outline planning permission for sixty dwellings was granted (under planning reference 15/00379/OUT) on 22<sup>nd</sup> January 2016 which also included the re development of the old Hall. A subsequent application was submitted under planning reference 17/00964/FUL to provide 72 dwellings on that area of land which excluded the site of the Old Hall. This permission was granted on 17.12.2018 and this is the operative planning permission which is being implemented.
4. Bullwood Hall historically was located to the West of the former prison walls and is locally listed, constructed in the late 19th century. It is a three storey building with a rendered façade painted white under a pitched tiled roof.
5. Further north along Bullwood Hall Lane and closer to the site entrance are a number of detached residential properties, some of which are Grade II listed including North Lodge, Whitbreds, South Lodge and the

barn on the west side of the lane, 70 metres north of South Lodge. The site is surrounded by a comprehensive network of public rights of way (PROW). Public footpath No. 3 follows Bullwood Hall Lane from its junction with High Road south towards the site. Public footpath 49 runs along the western edge of the site entering the site at its southern end. Pubic footpath

6. This current proposal seeks permission for the demolition of the Hall building to make way for 6 residential apartments with associated car parking (12 parking spaces) and 6 cycle storage and associated landscaping. Foul sewage is to be conveyed to the mains drainage system. The Design and Access Statement submitted in support of the application states that the proposed apartment utilises the same footprint and position of the existing (current) Bullwood Hall building.
7. The main body of the approved Phase 1 development lies to the south, accessed from High Road along Bullwood Hall Lane passing a number of private residences consisting of lodges and former farm buildings four of which are listed.

## **RELEVANT PLANNING HISTORY**

8. 15/00379/OUT: Outline Application to Demolish Existing Prison Complex Buildings, Convert Bullwood Hall into Terrace of Three Houses Incorporating Extension, Provide Residential Development of 60no. Dwellings, Alterations to Access and Access Road: Granted Planning Permission 21.12.2015
9. 17/00964/FUL: Redevelopment of former prison complex to provide 72 dwellings comprising 14 no five bedroomed, 13 no four bedroomed, 18 no three bedroomed, 9 no two bedroomed houses, and 9 no two bedroomed and 9 no one bedroomed apartments: Granted Planning Permission 17.12.2018.
- 10.20/00330/FUL: Proposed Creation of a Temporary Marketing Suite Including the Construction of a Single Storey Building for use as an Office for the Purposes of Marketing the Adjacent Housing Development and Associated Laying of Hard Surface to Create a Car Park of 5 No. Parking Spaces : Granted Planning Permission 19.08.2020.

## **MATERIAL PLANNING CONSIDERATIONS**

11. The proposed development must be assessed against relevant planning policy and with regard to any other material planning considerations. In determining this application regard must be had to section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires proposals to be determined in accordance with the development plan unless material considerations indicate otherwise

12. The relevant parts of the adopted Development Plan are the Rochford District Core Strategy (2011), the Allocations Plan (2014) and the Development Management Plan (2014). These are supplemented by a whole suite of complimentary Supplementary Planning Documents including Supplementary Planning Document (SPD) 2 House Design, regional standards and Guidance including the 'Essex Parking Standards (adopted 2010), The Essex Design Guide and national standards and policies as set out by The National Planning Policy Framework (July 2023) and the Technical Standards (the nationally described space standards for new residential development.

### **Principle of Development**

#### **Green Belt Issues**

13. The site is located within the Metropolitan Green Belt which places strict control over development in line with the purpose of Green Belt policy. The key issues in this respect are considered to be the following:

(i) Whether the proposal is inappropriate development in the Green Belt

(ii) The effect on the openness of the Green Belt

(iii) Other considerations

and

(iv) If the development is inappropriate, whether the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations so as to amount to the very special circumstances necessary to justify the development.

(i) Principle of Development and whether the development constitutes inappropriate development within the Metropolitan Green Belt:

14. The site is located within the Metropolitan Green Belt as defined by the council's adopted Allocation Plan. The National Planning Policy Framework (as revised in July 2021) advises at paragraph 152 that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 153 advises that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

15. Paragraph 154 advises that the construction of new buildings are regarded as inappropriate in the Green Belt but citing a number of exceptions which include at exception (g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt

than the existing development; or – not cause substantial harm to the openness of the Green Belt, where the development would reuse previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

16. The council's Local Development Framework Core Strategy Policy GB1 (Green Belt Protection) reflects the objective of directing development away from Green Belt Land and prioritising its protection in line with the very purposes and objectives of Green Belt Policy as cited by the National Planning Policy Framework.
17. The first issue to consider is that of whether the site can be considered to constitute previously developed land as defined by the National Planning Policy Framework. The site although redundant does fall within the definition of previously developed land and therefore development as a matter of principle would not be inappropriate by definition.

(ii) **The effect on the openness of the Green Belt**

18. Notwithstanding the first consideration, given the historic interest of the building and the fact that it bears a number of architectural features the demolition of the building and its replacement with what is proposed which is a building bearing a roof height of 11.41 at maximum height and a length of 28.07 m incorporating flat roof dormers and parapets will change the character of the site and the replacement building in officers view will appear greater in scale. The proposed development will have an impact visually quite different from that of the existing also which will fail to preserve openness. The visual dimension of openness was the subject matter of caselaw in *Turner v. SSCLG* [2016] EWCA Civ 466. On the basis of this judgement, it is considered that the consideration of the likely visual impact of any development on the openness of the Green Belt is a legitimate and relevant consideration in terms of the question of whether the openness of the Green Belt would be preserved. In concluding the development is considered harmful by reason of its bulk and scale and visual impacts.

19. (iii) Other Material Considerations

**Impacts Upon Heritage Assets.**

20. The existing building and the local list The Rochford District Council – Local Development Framework Local List Supplementary Planning Document 2013 provides a register of buildings, which may not be considered to be worthy of protection under Listed Building status but are regarded as important heritage assets contributing to the character of Rochford District. Policy 4.1 in the Appendix 3 provides the criteria which buildings are judged against for inclusion in this list. These are broken down into architectural importance, historical importance and

street scene. Bullwood Hall is locally listed as follows: Estimated 20th Century origin; three storey building; rendered and painted façade; exposed timbers to the first floor; gable roof with intersecting gables; decorative ridge tiles; several chimney stacks; predominately flat roofed dormers; yellow brick with red brick detailing to the ground floor; flat roofed entrance porch with parapet; white surround around front door.

Justification:

21. Bullwood Hall, built in the Domestic Revival style, is an asymmetrical building of three storeys and has a tall roof covered with clay tiles and decorative ridge tiles, tall chimneystacks and leaded dormers. The upper parts are rendered and painted, with exposed timbers in the gables. The lower part of the walls is exposed yellow brick with red brick detailing. The front, north elevation has an off-centre flat-roofed entrance porch with parapet.
22. The submission recognises the pre application discussions which took place prior to the submission of the application: The proposed Phase 2 redevelopment of Bullwood Hall was discussed during a pre-application meeting in October 2017 with County Urban Designer and Historic Buildings Consultant. The local listing of the existing structure was reinforced and in it was made clear that there will be an objection from a heritage perspective to the demolition of the existing building.
23. The application has sought to justify the demolition of the building on the basis that its deteriorating fabric is beyond repair and although private and confidential documents in the form of structural surveys and costs / repair analyses have been submitted by the applicant and scrutinised by independent consultants on the behalf of the council the plain fact of the matter is that in planning policy terms and on the basis if the evidence submitted which is countered by an independent view – there is no justification for the demolition of the building. To allow demolition would be contrary to the provisions of Chapter 16 of the Framework relating to ‘Conserving and enhancing the historic environment’ and this position is underpinned by Essex Place Services Historic and Built Environment in its continued objection to the proposals.
24. In terms of National Policy in the NPPF, the key paragraph is 203, where the loss of a non-designated heritage assets should be considered in a similar way to the loss of a designated heritage asset, though adjusted for the scale of any harm or loss and the asset’s significance. Since the scheme entails the total loss of the asset, the public benefits of the scheme would need to outweigh the harm caused by this loss. There are no public benefits to counter against this harm. In terms of local planning policy in Rochford, Policy CP3 - Local List and the Local List SPD, as well as Development Management Plan Policy DM7 - Local List, seek the retention of Locally listed Buildings, and so strong justification for the loss is required. Supporting documents set out the case that the economic repair and conversion of

Bullwood Hall into three houses is now unviable and that a replacement building providing a mix of flats would be preferable. On that basis the Council would be able to grant consent since the local policies have weight according to their degree of consistency with the Framework and on that basis the public benefits as noted elsewhere would be sufficient to outweigh any harm to heritage. However the Local Planning Authority does not accept this argument.

25. It is desirable that the new building demonstrates a comparable or even enhanced quality of design as that currently seen in the existing building. It is the applicant's case that as currently proposed the new building would utilise a similar footprint and location as the existing Bullwood Hall building. The relationship to the site, surrounding landscape and historical context would therefore in part be preserved. The massing of the new building would broadly reflect the massing of the existing building. The new building would also replicate the role of the existing building in the landscape setting providing a focal point or vista. Likewise views from the new building of the landscape which are significant in terms of its setting would be retained. The elevations are of a contemporary design with a strong symmetry. The scheme has been revised following officer comments to give it a stronger domestic feel with dormer windows set into a pitched roof. This would reflect the character and roof form of the existing building. The proposed materials would also make reference to the existing Bullwood Hall using brick and rendering. The palette of materials would also be consistent with the pallet of materials used for the new housing scheme.
26. Although acknowledged how the design approach has sought to enhance the quality of built form this approach does not work when it involves the demolition of a building which is still of inherent local significance and as such the merits of the design as the application promotes does not outweigh the harm in Green Belt terms nor in the loss of a non-designated heritage asset terms.

### **Landscape and Visual Impact**

27. The applicant has submitted an assessment, the purpose of which is to identify landscape and visual receptors likely to be affected by the second phase of the development and determine the extent and significance of any potential effects against the findings of the Landscape and Visual Report (Ref: LA3013-001 POS, IDP Group, Sept 2017) which assessed phase 1.
28. The applicants position in this context is: 'Bullwood Hall has evidently fallen into neglect with the building visibly in a poor state of repair and its surrounding grounds neglected and overgrown with scrub and self-seeded trees. This is shown on Figure 3 Illustrative Photographs 1 to 5. The redevelopment of the former prison will have fundamentally changed the nature of the site from the time of writing the Landscape and Visual Report, currently in the process of changing to a residential

development set within substantial areas of public open space. The removal of the former Young Offenders Institution and Prison and the redevelopment of the land for housing has allowed for the retrieving of the historic landscape attributes of the estate. The replacement of Bullwood Hall itself with a contemporary apartment building of a similar scale provides further opportunities to enhance the site and reassert the intentions of the original design of the site'. The determining authority however does not accept this approach nor justification.

### **Design and Character**

29. The National Planning Policy Framework which sets out the government's planning policies for England and was revised on 20th July 2021. The revisions increased the focus on design quality, not only for sites individually but for places as a whole. Terminology is also now more firm on protecting and enhancing the environment and promoting a sustainable pattern of development. The Framework at Chapter 2 highlights how the planning system has a key role in delivering sustainable development in line with its three overarching objectives (Economic, Social and Environmental) which are interdependent, and which need to be pursued in mutually supportive ways such that opportunities can be taken to secure net gains across each of the different objectives.
30. The National Planning Policy Framework at Chapter 12 emphasises that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. The Framework at paragraph 130 advises that planning policies and decisions should ensure that developments will, amongst other things, function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development. Developments should be visually attractive as a result of good architecture, layout and appropriate and effective landscaping and be sympathetic to local character and history, including the surrounding built environment and landscape setting, whilst not preventing or discouraging appropriate innovation or change (such as increased densities where appropriate).
31. The Framework at paragraph 134 indicates that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of



design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

32. These principles at the district level are embedded within the council's Local Development Framework's Development Management Plan and Core Strategy including policies DM1 (Design of New Developments), DM25, DM30, and Core Strategy policies CP1 (Design) and in the Essex Design Guide and Supplementary Planning Guidance.
33. The submitted Design and Access Statement indicates:

As part of the approved Phase 1 design development, we have undertaken a study of built form within the immediate site and wider environs. No uniform architectural style is prevalent, however a number of common details and materials have been identified: Facades are predominantly of brickwork accompanied by render and tile hanging to add relief with the occasional Tudor Revival gable feature. Roofs are pitched with dormers, chimneys and gables to add further richness to the street scene. The adjacent images give an indication of the proposed scale, detailing and material choices in the immediate area.
34. Design Development Early sketches were developed to consider the potential palette of materials and overall built form. One of the key principles adopted was the use of gabled roofs both as an aesthetic and practical solution to breaking down the overall mass of the building and to provide adequate space within the roof to plot two apartments of similar scale as those below. Use of balconies on the south elevation to exploit long distance views and serve as solar shading to the windows behind. Further design development of both plan and elevation produced a softer approach to the contemporary elements to blend them more smoothly with the traditional aspects. In the later iteration, the plan focuses on reinforcing the layering of the elevations by stepping the building line back from the centre.
35. The supporting statement goes onto state 'Moreover, the elevation design provides further layers through the creation of various levels of recess around window openings, with contrasting brickwork utilised to help visually navigate the assorted depths. Dormers feature more prominently in this development sketch to give the second floor the additional head height required to function at a similar scale as the apartments below, whilst reducing the impact of the overall mass in lowering the ridge height of the roof. Less variety has been employed in the use of materials across the facade. At ground and first floor the elevations are comprised predominantly of brickwork, rooting the design more firmly, into a modernist approach of less is more.
36. The supporting documents continue as state 'the design proposes a striking contemporary approach in contrast with the arts and crafts aesthetic of the approved Phase 1 proposals to reflect the prominence of the building within the wider context. The use of metal cladding with

vertical seams to the dormers and gables provides a contemporary interpretation of traditional forms. The elevational treatment at ground and first floor makes use of a layered brick facade with a regulating grid of window openings expressed with a recessed brick of contrasting colour and bonding. The use of slate effect tile as the primary roofing material allows for a sleek clean geometry to the roof form in line with the contemporary aesthetic. Facing brickwork is proposed to match that utilised elsewhere within the approved Phase 1 proposals in order to develop a level of synergy with the main body of residential development. Elements of the existing building have been referenced in the proposed scheme in relation to roof forms (gables and dormers) and entrance treatment (projecting single storey entrance).

37. The submission continues and states: ‘the proposed layout has been developed through a linear process of context and site analysis followed by consideration of landscape and urban design frameworks and finely tuned in consultation with partners. It is felt that a sensitive and appropriate response has been made with respect to the challenges and opportunities that this site presents, ultimately responding to the current state of considerable disrepair of the existing building by breathing new life into the area, whilst remaining complementary to the existing development. It is envisaged that the scheme will make a positive contribution to the area, promoting natural surveillance, assisting legibility and presenting a stylistic contrast to the more traditional aesthetic of the approved Phase 1 proposals.
38. Given the context of the site and the inherent architectural qualities of the existing building it is considered that although at another location and context the design could be appropriate it is not in this instance as the bulk of the building and its features including parapets will give rise to a building which appears out of place within this specific setting disconnected with its setting. It is considered that the development is therefore contrary to Chapter 12 of the Framework and policies CP 1 of the Core Strategy, Policy DM1 of the Development Management Plan and the councils SPD 2 (Housing Design).

### **Ecology and Effect of the development on the Essex Estuaries Special Protection Area & RAMS mitigation**

39. The framework at paragraph 186 indicates that when determining planning applications local planning authorities should give regard to whether proposed development affects protected and designated habitats, individual species and biodiversity as a whole. The site is within the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) zone of influence for the Crouch and Roach Estuaries Special Protection Area (SPA) and Ramsar site and the proposed development falls within the scope of the RAMS as relevant development. Given that the proposal is for additional housing and its proximity to the SPA, there is a reasonable likelihood that these

coastal areas would from time to time, be accessed for recreational purposes by future occupants of this development. This additional activity would have the potential, either alone or in combination with other development in the area, to have a likely significant effect on the European site.

40. The Conservation of Habitat and Species Regulations 2017 (the Regulations) require that the competent authority must ensure that there are no effects from the proposed development, either alone or in combination with other projects, that would adversely affect the integrity of the SPA. The likely significant effects arising from the proposal need to be considered in combination with other development in the area and adopting the precautionary principle.
41. The Essex Local Planning Authorities within the Zones of Influence have developed a mitigation strategy to deliver the measures to address direct and in-combination effects of recreational disturbance on SPA's. The Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) sets out a strategic approach to mitigation by several councils across the wider area. It details mitigation measures that would be funded by financial contributions at a specified tariff per dwelling. Since these include a range of habitat-based measures such as education, communication and monitoring, and have been endorsed by Natural England (NE), the authority's position is that such measures would adequately overcome any adverse effects of the proposal on the SPA. A tariff to fund the mitigation, which is payable for all additional new dwellings which at the time the application was submitted was set at £125.58 per dwelling. Payment has been made such that the development is policy compliant in this instance.

**Ecology: Bats**

42. The framework at paragraph 180 indicates that when determining planning applications local planning authorities should give regard to whether proposed development affects protected and designated habitats, individual species, and biodiversity as a whole.
43. A bat roost has been confirmed within Bullwood Hall House, with two Common Pipistrelles seen emerging from this building during two of the emergence / dawn bat surveys undertaken in 2014 and 2015. The emergence and re-entry surveys in July and August 2018 reaffirmed these results. Two Common Pipistrelles recorded emerging from beneath the roof tiles on the southern elevation of the building during the emergence survey in July, whereas a single re-entry of a Common Pipistrelle was observed during the dawn re-entry survey in August 2018. A possible re-entry was also witnessed on the eastern elevation of the building with a Common Pipistrelle possibly entering through the top floor windows.
44. On the basis of the current evidence, and the existing proposals, the mitigation measures to be recommended would be the provision of bat

boxes on retained trees. Three Schwegler 1FD and three Schwegler 2F bat boxes have previously been installed on suitable trees in the surrounding area as part of the mitigation detailed within the existing licence. A Natural England European Protected Species (EPS) licence has been obtained for the proposed works on Bullwood Hall House based on the previous planning application for the wider residential development (licence ref: 2016- 26475-EPS-MIT-1), and the named licensee has been modified in favour of the Sanctuary Group.

45. The wider residential planning permission included the renovation of Bullwood Hall House. This position has now changed, and the building is to be demolished as part of the proposals to which this assessment supports. In order for the proposals to be implemented, the granted Natural England EPS licence will need to be modified to include the changes in proposals and the most recent survey findings. The modification of the EPS licence must be agreed with Natural England prior to the commencement of works on Bullwood Hall House. It is not considered that the change of works will pose a greater impact on the local bat population, and therefore it is expected that mitigation put forward within the original licence will not be significantly altered.
46. Current mitigation detailed within the licence comprises the fitting of one-way excluders over known roost locations followed by the soft demolition of the building, including a hand strip of the roof. These activities will be undertaken under the supervision of an ecologist who will be present to handle and move any bats encountered to one of the preinstalled bat boxes. With regards to birds, the amenity shrubs and trees, as well as the scrub surrounding Bullwood Hall House does offer both nesting and foraging opportunities. It is recommended that any suitable bird nesting habitat be cleared outside of the nesting season (typically March to July inclusive) to avoid a potential offence under the legislation. Where this cannot be achieved a check survey for nesting birds should be undertaken by an ecologist, with any confirmed nests left in situ until the young have fledged.
47. In summary, the survey work undertaken has identified that the habitats within the site are of limited nature conservation. However, the presence of bats roosting within Bullwood Hall House has been confirmed during surveys. While an existing Natural England EPS licence is in hand, it will need to be subject to a modification and supported by the ongoing updated surveys. It is considered that the mitigation recommended within this report would satisfactorily avoid any adverse impacts on the protected species identified within the site. Accordingly, it is considered that all relevant planning policy requirements would be met.

## **Impact of the proposed development on Trees**

48. The framework highlights and elevates the importance of retaining and providing trees where appropriate within development proposals. A Tree Report and Tree Protection plan has been submitted with the application. The report identifies trees located on the periphery of the site and within neighbouring land which could potentially be affected by construction works, whilst the Tree Protection Plan indicates the measures required to provide protection for them as best prescribed in the guidance of BS5837: 2012 'trees in relation to design, demolition and construction'. Revised details have been submitted on the basis of which the council's Arboricultural Officer has no objection subject to conditions.

### **Access, Parking and Highway Safety**

49. Policy DM30 of the Development Management Plan aims to create and maintain an accessible environment, requiring development proposals to provide sufficient parking facilities having regard to the Council's adopted parking standards. Additionally, the Council's adopted Vehicle Parking Standards 'Parking Standards Design and Good Practice' (September 2009) SPD contains the parking standards which are expressed as minimum standards for residential development. 12 car parking spaces are proposed and no visitor parking spaces. Given that the site is served by public transport at the Bus Stop on the main road it is not considered that planning permission could be refused on the basis of the parking provision indicated.

### **Private Amenity Space Provision**

50. The Local Development Framework's Supplementary Planning Guidance SPD 2 (House Design) guidance indicates the requirement for a minimum garden area space to serve new developments. The Design Guide criteria for minimum garden areas has been adapted as a result of changing household sizes. The range of house types now required includes a considerable proportion of small dwellings. The resultant higher densities mean that garden sizes are likely to be below the 100 m<sup>2</sup> minimum recommended in the Design Guide. The SPD indicates that detached houses shall have garden areas no less than 100m<sup>2</sup>.
51. The proposed layout plan does not show how private amenity space is to be provided, however it must be noted that the site is adjacent to a significant area of public open space such that the development could not be refused on this account.

### **Technical Housing Standards**

52. New dwellings must comply with the Technical Housing Standards introduced in March 2015, as cited by the Department for Communities and Local Government Technical Housing Standards – Nationally Described Space Standards which set out minimum space requirements for the gross internal area as well as required floor areas and dimensions for key parts of the home, notably bedrooms, storage, and floor to ceiling height. A dwelling with two or more bed spaces should have at least one double room.
53. In order to provide two bed spaces, a double or twin room should have a floor area of at least 11.5 square metres. One double or twin room should have a width of at least 2.75 metres and every other double room should have a width of at least 2.55 metres. Any area with headroom of less than 1.5 metres is not counted within the gross internal area. A built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements but should not reduce the effective width of the room below the minimum widths indicated. The minimum floor to ceiling height should be 2.3 metres for at least 75% of the gross internal area. The dwellings proposed would provide the gross floor space requirements, bedroom widths and commensurate storage space such that there is no issue that such dwellings would or could not comply with the standards in this respect.
54. The submitted information states: Development Schedule In total there are 6 no. 2 bed 4 person private sale apartments. Ground and First Floor are comprised of slightly larger units at 83.6m<sup>2</sup> each, whilst at Second Floor development within the roof reduces the floor area to 79.7m<sup>2</sup> for each respective unit. Dormers and gables at each end of the building enable additional space to be utilised within the roof to comfortably accommodate the same functions as the floors below within a slightly modified layout.
55. Unit GIFA (sqm) Unit 1 2B4P 83.6 Unit 2 2B4P 83.6 Unit 3 2B4P 83.6 Unit 4 2B4P 83.6 Unit 5 2B4P 79.7 Unit 6 2B4P 79.7 Total 493.8

### **Refuse Storage**

56. The Council operates a 3-bin system for refuse and recycling. Refuse storage is indicated adjacent to the parking space and in the event of the recommendation being different this provision could have been conditioned.

## **CONCLUSION**

57. The proposals are in conflict with those policies which seek to preserve non designated heritage assets and which seek good design within the context of the site.

### **CONSULTATIONS AND REPRESENTATIONS (summary of responses):**

**London Southend Airport:** No objection providing the following apply:

Our calculations show that, the proposed development would conflict with safeguarding criteria unless any planning permission granted is subject to the following conditions: • The proposed development is either no taller than the existing building / fixed structures that have been / are to be demolished or; • The proposed development is no taller than the existing buildings / fixed structures on the site in close proximity We will therefore need to object to these proposals unless the above mentioned condition/s is / are applied to any planning permission. If you have any queries please do not hesitate to contact me. It is important that any conditions requested in this response are applied to a planning approval. Where a Local Planning Authority proposes to grant permission against the advice of London Southend Airport Company Limited, or not to attach conditions which London Southend Airport Company Limited has advised, it shall notify London Southend Airport Company Limited, and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002. We would request a copy of the Decision Notice is sent to London Southend Airport when it is published.

Please note that if you require a crane or piling rig to construct the proposed development, this will need to be safeguarded separately and dependant on location may be restricted in height and may also require full coordination with the Airport Authority. Any crane applications should be directed to [sam.petrie@southendairport.com](mailto:sam.petrie@southendairport.com) / 01702 538521. Yours faithfully,

**Essex County Council Lead Local Flood Authority SuDS:** No objection

SuDS is not a requirement of this scheme

**Rochford District Council Arboricultural Officer:** No Objection

I would recommend the impact assessment, method statements and tree protection plan be an approved document and a suitable condition provided to ensure that the detail contained within is implemented as part of the construction phase.

**Essex County Council Specialist Archaeological Advice:** No objection

**Rayleigh Town Council:** Objects on the following grounds: Green Belt, Inappropriate Design, Loss of 12 trees, loss of historic building, Inadequate access for more vehicles. Indicate that no drainage survey submitted and

question adequacy of refuse facilities and capability to partake in the council's recycling scheme.

**Essex Police:** No objection

Formal revised consultation response to original comment submitted by Essex Police on 14/07/20. Essex Police have had a constructive telephone meeting with a representative from IDP Group architects; following this and the documentation supplied by IDP Group, Essex Police is satisfied that crime prevention through environmental design has been considered and incorporated into the Phase 2 Bullwood Hall development as recommended in the NPPF, sec 12, paragraph 127, (f) Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder and the fear of crime, do not undermine the quality of life or community cohesion and resilience

**Essex Highways:** No objection

From a highway and transportation perspective the impact of the proposal is acceptable to the Highway Authority subject to conditions

**HISTORIC BUILDINGS AND CONSERVATION ADVICE:** Objection

Bullwood Hall, formerly Bullwood House, is a late nineteenth century building, much altered in the late twentieth century building, used to accommodate prison officers for the prison that was built upon the site. The site is located in close proximity to four Grade II listed buildings; North Lodge (list entry number: 1112668); Whitbreds (list entry number: 1322344); Barn north of South Lodge (list entry number: 1112664 and South Lodge (list entry number: 1322343). The listed buildings are historically associated with the former Bullwood House, apart from Whitbreds. However, I do not consider the proposed site to be within the setting of these designated heritage assets. Bullwood Hall is locally listed, therefore it is a non-designated heritage asset. The proposed total demolition of a non-designated heritage asset will result in significant harm to the heritage asset and the full weight of Paragraph 197 of the National Planning Policy Framework (2019) should be applied. Furthermore the 'deteriorated state of the heritage should not be taken into account in any decision' (Para.191), nor do I consider sufficient justification has been provided towards the demolition of the building. To conclude, I do not support this application and recommend it is refused. There would be significant harm to the non-designated heritage asset and where possible local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets. I recommend solutions are explored which includes the sustainable reuse of the existing building. There may be opportunity for development in the environs of the non-designated heritage asset however this must not adversely affect the non-designated heritage asset. This could be explored through pre-application process



Neighbours: have been received from the following addresses:

Numbers: 2, 5, 6 and St Nicholas Bullwood Hall Lane, Windrush, Bellwood Hall Lane, 17 Derwent Avenue, Hockley, 14 Harrow Gardens, SS54HG, 1 Marlborough Walk Hockley Essex, 25 Belchamps Way, Hockley, 14 Glenwood Avenue, Correspondence reflecting Residents Concerns highlighted at bullet points.

11 Hanford road Aveley, RM11

1 objection received from a Mr P Jones, No address provided

- This is getting ridiculous now. If it's not enough putting up with Hills or should I say Coinford wrecking the lane, smashing into fences with 40 tonne plus low loaders we now have the possibility of these car parking spaces encroaching on our property's. The lack of respect both have shown us has been discussing since they started. Julie Ramsey is aware of the situation. Where the old hall is situated there is enough room for parking at the front, side and rear of the building once is re build and replaced. Plus there's the issue of health and safety which continues to be ignored. Please don't get me started on the noise and start times. Workers arriving some mornings before 7.00 am to start banging about and starting machines up just after 7.00 am We was all told work will not start till 8.00 am let alone delivery's. This needs to stop.
- When plans for this former prison site were put to residents the original Bullwood Hall building was to be redeveloped into modern houses or flats. The building is in a poor state but not beyond transformation. We believe we should not be losing another piece of local history. The existing road is too narrow for the existing approved development, adding additional accommodation will only make this situation worse
- Hello I have a couple of concerns related to this application however have prepared a PDF document that I have emailed to the planning applications email address. Please could you upload my file with accompanying photo to my objection thank you.
- This application is the 2nd in a larger development site. I was under the impression that the development would only be on the W Sistine Hard standing footprint however these current plans propose a hard standing car park situated in front of my property where there is already a newly laid road. From a personal point of view this will ruin the green aspect that we overlook along with increased noise and pollution from the proposed car park. My children also use the green space to play. As the site has already seen 72 houses built which was already above the 62 originally proposed I fell the developers have already pushed the upper limit on residents and traffic so to have an additional 12 car spaces seems unnecessary and is positioned in an area not sympathetic to the area and an eyesore for existing residents.

- This comes as no surprise. The building has been subjected to deliberate vandalism over the last couple of years and we knew it was a matter of time before unscrupulous developers decided to pitch in for more unwanted and unnecessary buildings. The road is so badly damaged because of the heavy goods vehicles using it and nobody will accept responsibility for its repair. The single track nature of the road has already been well publicised and already has far too many cars using it. Most break the speed limit by more than 50% but not one member of national or local government gives a damn. Why do we have to wait until there are a series of bad traffic accidents and deaths before anyone sees sense that this is not the type of road which makes this form of massive over-development viable? There are already too many cars using the road - even before anyone moves into the new houses and flats. Adding another 12 to 18 vehicles to an over-saturated road is complete and utter madness and would only be considered necessary by national and local government officials who are either totally incompetent or corrupt.
- This is a heritage building and should not be demolished, it should be refurbished only. How much more is the devastation and over development of Rochford District going to be allowed. There is a tiny road in and out of this area, not enough for all the huge development happening there and now they want to increase traffic. This is complete over development, again with no infrastructure in place. Ruining the area, and a house that should be kept for community use.
- I regularly visit family and go for walks along the green spaces down this road as a lovely part of Hockley. Having older buildings with historical ties to show the kids should not be forgotten in this time of new built culture. I am also keen to know if the plans are in line with policy as understood the overall regeneration of the prison was to only built on the existing footprint. Surely 6 apartments and 12 parking spaces is utilising more than the current hardstanding as looks likes further greenery is being lost. Also walking kids and dogs through car parks is not ideal and as The open space is used by the public having further traffic and cars manoeuvrings in the centre of open spaces is not very safety conscious. Surely refurbish and better parking planning is a better option..
- Another beautiful building to be pulled down, over development and more pressure on Main Road with the extra traffic new residents will create.
- An interesting historical building that is part of the social history of Hockley, being part of the connection between Keddies farm an Bullwood hall farm. I remember the layout of the building, as a prison service employee for many years, and feel it would be better reworked into similar accommodation, and would appeal to purchasers more with its history.

- Too many houses are being demolished to make room to build flats. Planning permission had been granted to convert the building into flats and not to demolish it.
- The amount of houses being built has increased from the original plans. To demolish the old hall and add another 6 dwellings and 12 parking spaces is ridiculous. Where the proposed parking for the flats is means more of the green space will be taken. Ruining our views and increasing noise and pollution The road is never going to be suitable for the amount of traffic that is expected to use it
- Too many old houses in this area are being demolished to make room to build flats, I was under the impression that planning permission was given to develop this house into flat not demolish it so that more flat can be built on the site. Could be a case of a greedy developer with no thought for this area.
- No household address provided: Concerns: 1. Original planning consisting of 3 apartments this has been increased to 6, this will result in additional vehicles in an already congested single track road and will be bordering the upper limit advised by Highway Advice. 2. Car Parking allocated spaces proposed are visible at the front of my property leading to:
  - Destroying further green space
  - Leaving an unsightly view from my property that I have to live with day in day out
  - Destroying an area where children play
  - Obstructing walking access to the green open space and woods so potential safety issues for the numerous of public people on trail through woods
  - Planning permission for the 72 houses already included designated parking being built for the new houses to the left of my dwelling which will result in the feeling of a larger car park combine the proposed front and left already permitted.
- I would like to request that the developers look at alternative areas for the parking associated with Bullwood Hall, as there is ample alternatives within the complex of the new build development.
- I would also like the developers to consider the road implications as day to day living will already be congested so adding further vehicles will have a big negative impact to residents as we already have members of the public parking on the road to walk their dogs on the open space.
- I would like to lodge my objection to this application. Too many house in Hockley are being demolished and replaced with multiple buildings without consideration for long term environmental impact with additional traffic and social aspect such as increasing pressure on existing schools/doctors and public transportation.

- No objection to the demolition but objection to more home being built as Bullwood Hall Lane reduced to 2.5 meters in width in parts of the lane with no passing bays and pedestrians have to walk in the road (an accident waiting to happen)

### **Relevant Development Plan Policies:**

National Planning Policy Framework February (December 2023)

Rochford District Council Local Development Framework Core Strategy Adopted Version (December 2011) Policies GB1; CP1; CP3, T8; ENV9 & H6.

Rochford District Council Local Development Framework Allocation Plan (February 2014).

Rochford District Council Local Development Framework Development Management Plan (December 2014) polices DM1; DM4; DM7, DM21; DM27 & DM30,

Parking Standards: Design and Good Practice Supplementary Planning Document (December 2010)

Rochford District Council Local Development Framework Supplementary Planning Document 2 Housing Design (January 2007)

Technical housing standards - nationally described space standard (March 2015)

Supplementary Planning Document 2 (January 2007) – Housing Design

The Essex Design Guide (2018)

### **RECOMMENDATION: REFUSE**

1. The proposed total demolition of a non-designated heritage asset will result in significant harm to the heritage asset whilst sufficient justification has not been provided to support the case for demolition towards the demolition of the building. The proposed development is therefore considered contrary to paragraph 203 of the Framework (December 2023) and the councils policies CP3 - Local List and the Local List SPD, as well as Development Management Plan Policy DM7.
2. Given the context of the site and the inherent architectural qualities of the existing building it is considered that although at another location and context the design could be appropriate it is not in this instance as the bulk of the building and its features including parapets will give rise to a building which appears out of place within this specific setting and

disconnected with its setting. It is considered that the development is therefore contrary to Chapter 12 of the Framework (2023) policy CP 1 of the Core Strategy, policy DM1 of the Development Management Plan and the councils SPD 2 (Housing Design).

3. It is considered that the proposed development bearing a roof height of 11.41 at maximum height and a length of 28.07 m incorporating flat roof dormers and parapets will change the character of the site and will appear greater in scale than the existing building. The proposed development will have an unacceptable spatial and visual impact and will fail to preserve openness thereby conflicting with Chapter 12 of the Framework. No very special circumstances are considered to exist which would need to prevail to outweigh the harm found.

The local Ward Member(s) for the above application are Cllr M O'Leary  
Cllr D W Sharp Cllr Ms S J Page