

**The Warren Golf and Country Club  
Planning Appeal Reference  
APP/X1545/W/21/3280176**

**Response of the  
Woodham Walter Parish Council**

*The Clerk to the Parish Council*

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## **Woodham Walter Parish Council**

**Appeal by The Warren Golf and Country Club Limited**  
**Planning Application FUL/MAL/20/00519**  
**Appeal Reference APP/X1545/W/21/3280176**

### **Response by the Woodham Walter Parish Council.**

Town and Country Planning (Hearings Procedure) (England) Rules 2020.

#### **1. Preamble.**

- 1.1. It is noted that as of the 6 January 2022 no inspector has yet been appointed under Rule 5 of the Town and Country Planning (Hearings Procedure) (England) Rules 2020
- 1.2. The Woodham Walter Parish Council (WWPC) submitted a consultation response to the planning application on 19<sup>th</sup> August 2020 and after deliberation considers that the comments made within that document should remain extant.
- 1.3. There will be a WWPC representative at the Hearing.
- 1.4. At 2.2 it is noted that the red line is drawn on the south side of Little Baddow Road yet on landscaping drawing PD14 and on PD02 Rev. G, an area to the north side of Little Baddow Road is shown together with a playground. The area within the red line only is considered. However, documents continue to refer to an external play area and the site excluded is rendered on drawings.

- 1.5. It is also noted that following a pre-application meeting with officers and members of MDC on 5th November 2018 the original proposals for a development of 99 lodges was reduced to 70, 50 of which were contained on the Bunsay Downs site, and a multiuse games area (MUGA) was removed from the proposals.

## **2. Executive Summary.**

- 2.1. The WWPC remains fully of the belief that this planning appeal should be dismissed.
- 2.2. It is not considered that there has been any further and compelling evidence in the Statement of Case to change the local Planning Authority's decision which is believed to be correct.
- 2.3. The Parish Council and a very large and significant majority of local residents firmly believe that the proposed development will introduce an incongruous and visually harmful development into the village to the extent that it will not only change the character and demography but will also introduce a significant urbanising impact not only on the site but also the infrastructure and road safety.
- 2.4. It also considers that the proposals will be detrimental to the wellbeing of the residents and the village with increased danger from road traffic combined with noise, light and air pollution together with the effect on the flora and fauna that has been largely overlooked.
- 2.5. This proposed development would severely compromise the long views over the rural landscape for which the Arcadian village is renowned.
- 2.6. It is also the opinion of the WWPC that the description of the facilities offered and described in the Statement of Case is in fact overstated and misleading.
- 2.7. The Parish Council does not consider that any perceived economic benefit will outweigh the potential damage to an

- area of high value landscape and to a picturesque and vibrant village. In its opinion this fails against Maldon District Council policy S1, sustainability.
- 2.8. It also fails against Maldon District Council policy S8 as the site lies outside of the defined settlement area and it will not improve rural diversification, recreation and tourism as those facets are already extant. The impact on the intrinsic character and beauty of the area will be significant with the extent of development and infrastructure including lodge carparking and additional and significant car parking extending the existing, and with a substantial increase in traffic, the impact of which is strongly believed to have been underestimated in the related reports.
  - 2.9. Contrary to what is stated in 10.1.5 of the Appellant's Statement of Case, the adverse impact on the immediate surrounding settlements and the village will be significant by affecting character, landscape, noise, light, safety, demography and infrastructure.
  - 2.10. The Appeal documents appear to continue to overlook the issue of protected species within the Bunsay Downs site and the affect that the development proposals will have during construction and from visitors in contravention of Local Development Plan policy N2.
  - 2.11. In terms of policy D1, the design quality of the lodges is nothing different from what can be seen in other similar developments and is not, in the opinion of the WWPC, sufficient to mitigate such an extensive and intrusive development.

### **3. The Impact on the Visual Landscape (IVL).**

- 3.1. At 6.1.4 the point is made that only 6.3% of the Warren Estate will be devoted to the proposed development. This 8.3 hectares (ha) is integrated between the centre village defined settlement area, the Stivvy's Road/Gunhill

- settlement area and the Little Baddow Road/Spring Elms Lane/Bassett's Lane settlement area and is an intrinsic part of the open landscape of the Arcadian village.
- 3.2. Woodham Walter as a village is referred to in the Braintree, Brentwood, Chelmsford, Maldon and Uttlesford Characterisation Assessment document as being an Arcadian Settlement. It is a typical English Village with outlying groups of settlement; it is categorised as 'Rural in a sparse setting' in DEFRA's Rural-Urban Classification for Output Areas in England. This is amply illustrated in the approved and adopted Village Design Statement. Woodham Walter is one of only six designated Arcadian Settlements in the whole of the Maldon District (Maldon District Characterisation Assessment EB053, 2012).
  - 3.3. The scenery varies from open farmland to historic woods and has long views across open farmland interspersed by small, wooded areas. These are characteristic of the locale and can be experienced from all parts of the Village. The extent of the two golf courses and the old Warren Pit area can be readily determined and both areas were originally farmland with the Warren being laid out as a golf course following the purchase of the Warren house in 1904. The existing lodge park planning permission in 2007 was granted on the premise of the extraordinary topographic nature of the old gravel quarry site which was a self-contained bowl that prevented visual impact from the area outside of the planning site. This is not the case for the current application.
  - 3.4. Although the size of the development is small in comparison with the whole estate (132ha), its location on the Bunsay Downs site is a significant intrusion into the visual landscape, disturbing the long views from Little Baddow Road, the public footpath 12 and Common Lane (Appendix 1). Site 2 is also clearly visible from footpath 13 (Appendix 3) .
  - 3.5. This proposed development would severely compromise the long views over the rural landscape for which the village is renowned.

- 3.6. The intrusion will introduce a built environment into what otherwise has been a green open area of high landscape value. It will also add urbanisation in the form of increased vehicle movements, additional carparking, access ways, air pollution, light pollution, including flood lights and noise pollution.
- 3.7. The Greenlight report states that the proposed development has been designed to integrate with the landform in discrete compartments yet 50 units on a relatively small site area with visual connection to footpaths and roadway will create a significant and adverse change in character of what is currently open fairway.
- 3.8. An enlarged carpark with capacity of a further 67 new vehicle spaces in addition to the 54 provided for at the existing site plus 26 spaces for 1 space lodges and 48 for the 2 space lodges resulting in 195 spaces overall on the Bunsay Downs Site will create a significant visual intrusion. The additional 20 spaces on the second site when added to those of the Club House and those of the existing lodges and other holiday accommodation will make a very significant impact on the wider infrastructure with the additional vehicle movements. It will also intensify road safety issues with the narrow and restricted Herbage Park Road running from the main A414 to the Village and intensify the hazardous junction between this road, the Old London Road and the Warren Estate (Appendix 2) and the crossing footpath.
- 3.9. The impact of “staying night visitors” on the village will be significant. Point 4 of the Destination Research Statement stated that “Even at assumed occupancy level of between 42% - 60% this equates to an increase of 89,352 staying night visitors annually” in Woodham Walter. This is a daily average of 250 additional people staying in the village – i.e., an increase of 50% on the residential population. If the current occupancy rates of the Warren Estate lodge rentals are applied (83.3%) the number of staying visitors increases to 130,132, equating to 356 additional people staying overnight

- in Woodham Walter on a daily basis i.e. the visitor numbers would be a significant 71% of the resident population.
- 3.10. The impact of daily visitors that the site is expected to generate is also of considerable concern. The 'Tourism Development at The Warren Estate Report Findings' document, P9 totals 36,500 visits per annum, 18,250 contributed by the extended restaurant, and 18,250 by the New Golf Academy. This, when added to the existing day visitors to the spa, gym and golf course will have a very considerable impact on the local demographic and will have a significant impact on traffic movements in the village impacting on road safety.
- 3.11. The IVL refers to the enclosed nature of the site's boundaries as limiting the effect of the proposed development but it is suggested this does not mitigate it. It should be noted that the hedgerows throughout are of deciduous material and therefore for a large proportion of the year the site will have a level of exposure that will emphasise the extent of intrusion especially from the properties in Common Lane, Little Baddow Road and from Stivvy's Road (Appendix 1). At 5.4.10 of the Greenlight Environment report little weight is given to the visual effect on this wider community and the greater number of properties potentially affected by the proposals.
- 3.12. The report mentions Common Lane and the appearance of the development from the lane. It is considered naïve to suggest that walkers will look only in the direction of travel and not around them thereby considering the development to be a 'small distraction' with a 'slight' visual effect. The long views from Common Lane take in almost the whole of the southern part of the site where the majority of lodges are located (Appendix 1). Common Lane is a major access way to Woodham Walter Common, a SSSI, and for the residents of the houses at the end of the lane and the walkers accessing Woodham Walter Common the effect will not only be visual but one of noise transference and potentially light pollution.



- 3.13. The appearance from footpath 12 will be continuous from the stream to Little Baddow Road and the view will be across the extent of the site. (Appendix 1) The boundary of indigenous hedging is deciduous and further planting is unlikely to make a significant difference even after the suggested 7 years of maturation.
- 3.14. The proposals for site 2 (20-unit site) will have a similar effect. The development will be clearly seen from footpaths 12, 13 and Little Baddow Road and will change the character of the locale with the resultant intrusion on the setting of Wayside. Site 2 is separated from the golf course by a single width vehicle access track with meadow and woods to the north with the developed golf course to the south (Appendix 3).
- 3.15. At point 6.1.6 of the Statement of Case it is stated that 'the proposals would not create a landscape dominated by holiday cabins' and that there would be minor change in the overall balance of landscape character. It is difficult to understand how 50 units on a small site of hitherto high value landscape would create only minor change of landscape character. Comparison of the site layout plans with the Appendix images and an on-site inspection demonstrates the potential irrevocable landscape change.
- 3.16. The statement at 6.1.8 that the visual effects of the site changes would not be felt beyond 500m must be challenged. No consideration has been given to the effect that the proposals would have upon the character of the village and Parish and its demographic by potentially doubling the population. It is not just the visual effects but the physical ones of increased vehicle movements, noise and light pollution that will have a significant effect on the wider community.
- 3.17. The appellants point out that 'almost' every holiday park has been built on such appealing land. By this there is a recognition that the site is of high landscape value. The WWPC would similarly point out that each planning application should be treated on its own merits and do not

believe that this development at this location is suitable or sustainable.

- 3.18. The comments that were made at the planning consultation stage about the quality of the lodge designs remain extant. There is nothing in the design that offers mitigation for siting. In fact, some of the designs illustrated within the Appeal Statement by way of example would appear to be more attractive than the proposals and what is proposed will fail to protect the intrinsic character and beauty of the site. This would not appear to accord with policy D1 of the Maldon District Council Local Development Plan.

#### **4. Impact on Infrastructure.**

- 4.1. There is considerable concern over the effect of the appeal development on the infrastructure of the village and the surrounding area in view of the number of additional vehicles and additional movements as most of the advertised activities are off-site and require vehicular transport. The Transport Report clearly acknowledges that in view of the lack of public transport and the absence of highway footpaths the number of foot trips will be modest. They will also be highly dangerous but there is no road safety report.
- 4.2. The WWPC strongly believes, bearing in mind the dates when the ATC surveys were reported in 2019, that the number of vehicles and the speed of traffic recorded are not a true reflection of the situation due to the village through route being cut off by the Hoe Mill Bridge closure. This substantially reduced the number of vehicle movements by diverting traffic away from the village. Therefore, it is considered that the stated impact of the additional movements has been underestimated in the related reports.
- 4.3. The level of carparking provision as detailed in 3.8 above, extrapolated from the Transport Report and drawings, indicates a significant number of potential vehicle

movements superimposed on the narrow width country lanes leading to the Bunsay Downs site (Appendix 2). When this is compounded by trips taken to off-site facilities the impact on the rural village and infrastructure will result in a major village character change and introduce an urban environment with associated serious road safety issues.

- 4.4. These movements in addition to those of the lodges quantified in the report and detailed at 3.10 above are totalled at 36,500 visits per annum, 18,250 contributed by the extended restaurant where movements are likely to be concentrated at specific times rather than spread over a wide period, and 18,250 by the New Golf Academy. This will alone equate to in excess of 70,000 additional vehicle movements which when added to those of the existing golf club facilities, the non-resident gym and swimming pool members, the existing lodges and the new lodges are considered to be unsustainable given the very rural infrastructure.
- 4.5. No mention has been made of the tight and partially blind bend that is conveniently just off drawing that obscures the forward visibility in both directions on Little Baddow Road (Appendix 2). Also, no mention has been made of the very narrow lanes (Little Baddow Road, Spring Elms Lane and Bassett's Lane) running westwards beyond Bunsay Downs where carriageway width is restricted to one vehicle in places. (Appendix 2). This raises serious road safety issues for walkers, cyclists and horse riders.
- 4.6. The additional vehicle movements will create a level of noise and pollution harmful to the wellbeing of the village residents and the wider surrounding rural area.
- 4.7. The effect on the infrastructure will not just be vehicle movements. There is also the impact of people movements on the local area features such as footpaths, Bell Meadow and the new playground, designed and built for a small rural community and not for large numbers of holiday guests. These areas are maintained by the Parish Council using Precept income from village residents.

- 4.8. The Maldon District Infrastructure Delivery Plan, EB059d update, makes a point at page 9, item 3.9 that there is a shortage of 2 golf courses across the District, yet this proposal seeks to diminish the size and effectiveness of 1 public pay as you go golf course that would appear to counter the Delivery Plan.
- 4.9. It has been noted by residents that since the start of the pandemic, golf has seen a big resurgence in demand at Bunsay Downs and across the country. Therefore, to diminish the attractiveness and usefulness of one golf course would essentially be counterproductive when viewed against the Delivery Plan mentioned above.
- 4.10. The infrastructure will also be adversely affected by surface water runoff from hard surfaces and other discharges. It is to be noted that the stream on the Bunsay Downs site has a tendency to flood within the village area and additional discharges whether surface water will exacerbate the situation.

## **5. Impact of Noise and Light.**

- 5.1. The village of Woodham Walter is a very quiet one and notwithstanding the acoustic report and supplementary report, sound travels far especially at night when ambient noise is reduced to a minimum.
- 5.2. Noise is already an issue with the Warren Estate from late night events and all-day events and with a new licence being granted to allow music and dancing until 01:00 six nights a week and 23:00 on Sundays it is unlikely that a noise management plan will make much difference.
- 5.3. At 7.1.6 of the Statement of Case it is stated that 'community noise' would not cause any change in behaviour and therefore be less than the no adverse effect level. By way of illustration to the contrary, it is known that existing 'community noise' from the Estate is causing an issue with

properties in Herbage Park Road on the east side of the Estate, on Little Baddow Road, Stivvy's Road and Common Lane resulting in Residents' complaints. There is thus variance with the report.

- 5.4. There is no mention of the hot tubs to be provided with some lodges with the resultant potential late night external noise that will impact on residents of the existing lodges and adjacent buildings.
- 5.5. It is not considered that a noise curfew is a manageable proposition especially as there will be a need for 24-hour access as so many of the stated activities are well off site, some quoted as far as being 18 miles away. Additional vehicle movements potentially at all hours will be an added burden for residents in Little Baddow Road and the wider community.
- 5.6. It is questioned as to whether a noise curfew would be acceptable at the level of holiday charging that is intimated and it is unclear how a noise curfew could be enforced. What possible threat could the operators have over their guests to enforce keeping the noise down? The guests would not have any penalty for making a noise, especially on their last night.
- 5.7. The question of noise from the activity hall and the clubhouse remains of concern just as it is from the main Golf Clubhouse.
- 5.8. There is also significant concern at the potential of noise that would derive from the Grassed Outdoor Play Area (MUGA) proposed for the north side of Little Baddow Rd opposite Apple Cottage and Hawkins Farm Cottages and close to Stivvy's Road. It is unclear if this reference is in fact to what was previously known as the 'Multi-Use Games Area'. If it is, it is misleading to include reference to activities that would have taken place there since the MUGA was removed from the application. If it is not a reference to the MUGA but rather to an activity area that is intended to be part of the development, then this should not be part of the Appeal given that it wasn't in the original application. In addition, the

WWPC strongly objects to this “Grassed Outdoor Play Area” for children given its proximity to residential housing and to a road. The appellant needs to ensure their documents are in order.

- 5.9. This would not appear to accord with the Activities Brochure that states this area would be used at least for Mini Crossbows, Learn to Bike, Body Zorbs, Tots Soccer Camp, Petanque, Baby Balance Bikes, Archery and Junior Golf Camp.
- 5.10. Lighting within the built environment is taken seriously within the village and is reflected in the Village Design Statement.
- 5.11. The Bunsay Downs golf course is set in what is essentially a dark sky area as it is open only during daylight hours. Being open 24/7/365 will mean the level of light pollution in this area will be significantly increased and will directly affect the immediate neighbours at Apple Cottage and Hawkins Farm Cottages as well as the wider area of Stivvy’s Road, Little Baddow Road and Common Lane.
- 5.12. The potential use of floodlighting to public areas of Bunsay Downs clubhouse and the proposed new golf academy will have a far-ranging visual impact as it will illuminate the wooded area and the pollution will be visible from Little Baddow Road, Stivvy’s Road and potentially Herbage Park Road and Common Lane.
- 5.13. With occupation of lodges on a 24/7 basis the extent of safety and security lighting will be a major factor in light pollution in what was hitherto a ‘dark area’. This will have a significant impact on the wildlife of the area that does not appear to be addressed.

## **6. The Impact on Flora and Fauna.**

- 6.1. The Essex Ecology Services report highlights the presence of bats, great crested newts and badgers within the Bunsay Downs site.

- 6.2. The appeal document appears to overlook this issue and the impact that the development proposals will have on these creatures through construction, and from visitors.
- 6.3. A Badger set can clearly be seen adjacent to the carriageway of Common Lane (Appendix 4) and this would appear to extend well into the proposed site. Whilst it may not extend as far as the most western lodges there will nevertheless be potential significant disturbance to the colony throughout the year in contravention of LDP policy N2. This will also be a direct site exit route to Woodham Walter Common creating potential further disturbance contrary to the Habitat Regulations.
- 6.4. The full impact of the proposal on the wildlife needs to be properly assessed before planning permission can be considered. This matter cannot be conditioned. Government guidance suggests that applications (or appeals) can be refused where insufficient evidence is provided. This is such a case. Indeed, it is suggested that a duty of care exists for the protection of certain species and therefore without mitigation the appeal has to be dismissed.

## **7. The need for Tourism Employment.**

7.1.1. At 5.2.4 the suggestion that predicted employment decline will be offset by tourism is considered to be subjective. The employment predictions for Maldon District Council area and in particular the Bradwell nuclear power station development alone indicate a significant increase in employment opportunities for Maldon District Council area with some 900 long-term sustainable jobs for at least 60 years. Planning permission for exploratory works has been granted.

7.1.2. Over the 9-12 years of construction, Bradwell B proposes to employ over 9,000 during peak construction, with

around 3,000 of those coming from the regional workforce. Therefore, the employment potential is likely to be more significantly enhanced by this rather than by tourism.

- 7.1.3. Local hospitality sector experience indicates that there are more jobs than applicants within the tourist and hospitality sectors and recruitment is proving very difficult.
- 7.1.4. The relevance of the reference to the Suffolk Coastal Local Plan is questioned as the authority, encompassing the whole of Suffolk Coastal, is disparate with the comparatively small Maldon District Council area. The geography and the demography are quite different. Suffolk is an agricultural county whereas Essex is essentially London commuter belt dominated. The needs and requirements are significantly different. The Suffolk Coastal Local Plan is predicated on a wide County basis rather than a small District one.
- 7.1.5. The appeal site is not a coastal but a rural inland one where the issues are totally different.
- 7.1.6. Because of the flat, marshy, estuarine coastline with a significant tidal range together with the easy access from metropolitan Essex, Maldon tends to be a 'day trip' location rather than a 'stay over' location. This tends to encompass the large number of permanent holiday caravans located along the shoreline.
- 7.1.7. At points 5.2.11 and 8.1.12 of the Statement of Case there is speculation that there will be an increase of FTE jobs of 97 but this is across three districts of the whole of Essex (8.1.12) with no suggestion that this will increase the extent of employment at the Warren stated as being 80 full and part-time staff (event catering etc) or of Maldon itself.



## **7.2. Need for Additional Tourist Accommodation.**

- 7.2.1. The question of need of additional tourist accommodation has been rehearsed in the original planning application consultation response.
- 7.2.2. Whilst the Economic Development Team considered that the development of ten lodges would be advantageous under application 18/00300/Ful (Meadows Barn, Woodham Walter) in 2018, the Inspector at the appeal considered otherwise and believed that the need for additional accommodation in Woodham Walter was not proven. The Parish Council does not consider that there is any new evidence submitted in response to this application and appeal to change the situation.
- 7.2.3. The support given to the application by the Strategic Tourism Manager was given when the proposal included a multi-use games area that has since been omitted. It is noted that the area proposed remains delineated on the layout drawings PD02 and PD14. In consequence the site only offers a very limited range of activities (golf, spa, swimming and walking) with the majority of advertised outdoor activities being accessed off-site at a distance ranging from 6 miles to 18 miles. It is to be noted that despite what is stated in the Statement of Case, there are no tennis courts. The additional facilities cannot be considered sustainable, and the fact that most outdoor activities are some distance from the site brings into question the sustainability of the proposal.
- 7.2.4. The three nearest holiday lodge sites have been omitted from point 5.3.1. Meadow Barn, Retreat Farm and Warren Estate are all within the village however only those at Heybridge, Steeple Bay and St Lawrence have been stated.
- 7.2.5. The Local Supply Analysis of available holiday accommodation as expanded for appeal purposes deals only with the Maldon District, Colchester and Tendring but

fails to include those sites in other neighbouring areas such as Chelmsford and Braintree.

7.2.6. At 5.3.4 in the Statement of Case the lodges currently available on the Warren Estate have been omitted although they offer all the facilities that would also be available to the proposed development.

7.2.7. There is a very considerable quantity of tourist accommodation within the wider area of the proposal and whether it is 'branded' or otherwise it still remains tourist accommodation and therefore additional accommodation requirements must be questionable. Indeed, there are a large number of sites providing a range of holiday accommodation within the Colchester, Tendring and Maldon districts that have been omitted from the Local Supply Analysis, as listed in the attached Appendix (Appendix 5). The new Travelodge opened in August 2020 alone offers an additional 60 rooms and does not appear to be listed in the accommodation schedules.

7.2.8. The proposed branding is subjective and relies heavily upon on-site outdoor facilities such as circuits, archery, equestrian, swimming, golf, clay pigeons etc. This site does not have a full range of facilities and only offers golf, swimming, spa, gym and walking. The swimming pool is very small with dimensions of only 15m x 6m, with a 1.3m flat immovable floor. It is not of sufficient size to accommodate the overall development that would number 172 lodge units together with the fixed accommodation within the existing building complex on the Warren site. It would also not allow for the activities of sea scooters, snorkelling and water walkerz proposed. There are off-site facilities that could be used but these involve travel and therefore transport and add to the significant number of vehicle movements already expected and defies the description of having all the facilities on one site.

- 7.2.9. At 5.3.5 in the Statement of Case it is suggested that there is a difference between static caravans and lodges. In reality they are both static caravans often with similar accommodation.
- 7.2.10. At 5.3.12 in the Statement of Case the appeal document refers to an 'experiential holiday village' offering 'a great facility for the local population'. Given the reference to "experiential" it is appropriate to emphasise the limited facilities that this site can offer, much of which is advertised being essentially off-site requiring travel to Chelmsford or the coast and adding to the vehicle movements on the restricted area infrastructure. The original Warren Lodges were set up on a short occupancy basis which clearly did not work as 'experiential' as they were swiftly turned into units for sale with an 11.5-month occupancy restriction. To achieve this 'experiential' holiday village as advertised would result in further potential loss of high value rural landscape and alter the village demographic.
- 7.2.11. Hoseasons in support of the application point out that "Many parks can offer a good quality of accommodation, but little have the facilities to go with that". The facilities offered by the proposal do not appear to fulfil that brief, do not appear to be as advertised or achieve Centre Parcs activity level.
- 7.2.12. At 5.3.12 in the Statement of Case, Visit Essex is quoted in Document WE6 as referring to "easy access" to Essex. Access to Woodham Walter is not at all easy, given that the only access is by car through narrow country lanes and roads, thereby creating noise, pollution and road safety issues which will be harmful and damaging to the village and to the surrounding rural environment. The distance from the nearest main route (A414) is approximately 2.5 miles and from the A12 at Hatfield Peverel is approximately 5 miles and utilises a weight

restricted narrow lane bridge the access to which is often subject to flooding (Appendix 2).

- 7.2.13. At 5.3.13 and 5.3.15, reference is made to letters from Hoseasons (WE7) in which the link is made between the quality of facilities supposedly on offer in the development and all year-round demand for this type of accommodation. This is also referenced in WE6. But, given that many of the outside activities will not be available or, if available, not enjoyable in anything but dry weather, and given the poor quality of the indoor facilities such as the very small swimming pool, the WWPC cannot accept that the 'all year round' argument can be used to support the Appeal.
- 7.2.14. The argument levelled at 5.4.3 in the Statement of Case on occupancy levels for the five existing lodges remaining in short lets is countered by the fact that this level perhaps could not be sustained with a larger number of units being available. More units are in process and are being sold. Presumably, if there were such substantial need for short let lodges, the Appellants would not continue to sell the new builds. It is to be noted that the original Warren Lodges were conceived and approved on a short occupancy holiday basis which clearly did not work as they were swiftly turned into units for sale with an 11.5-month occupancy restriction.
- 7.2.15. The Activities Brochure (WE11) refers to an outdoor area, "The Pavilion," (not mentioned in the planning application) where it is intended that a range of pursuits (laser clay, archery and crossbow) would be available. It should be noted that the Pavilion itself is virtually a ruin and it is believed may require separate planning permission in the event of re-building. The proximity of these stated activities on a regular basis, very close to the two nearby domestic properties including Redgates and adjacent to public bridleway 10, would be disadvantageous to the enjoyment of the dwellings and

the wellbeing of the residents given the resulting noise and potential danger from the activities proposed (Appendix 3).

- 7.2.16. In particular the bridleway, running adjacent to the old cricket ground and immediately behind the old pavilion, gives rise to the possibility of noise and danger to walkers, riders and animals and is a grave cause for concern (Appendix 3).

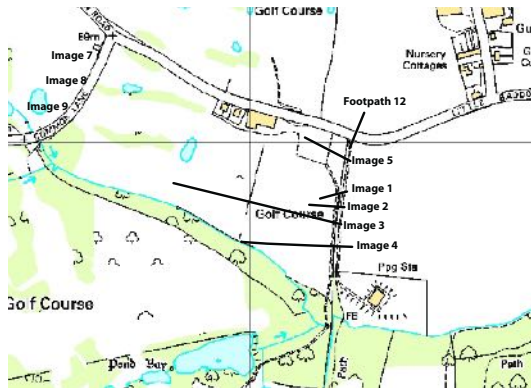
## **8. Conclusion.**

- 8.1. The WWPC does not consider that the additional information and statement of case demonstrates any benefit against the significant harm that the proposal poses to the rural character of the site and the village.
- 8.2. The presumption in favour of sustainable development as set out in the National Planning Policy Framework is not accorded with. The proposal does not achieve one, let alone all three core sustainable values, economic, social or environmental. The proposal provides little economic benefit and meets no identified need. No social benefit is achieved. The proposal relies on other tourism facilities some distance from the site with potentially limited take up. Those facilities are already available for local residents. Given the lack of mitigation and the potential impact on protected species, the proposal has a negative impact on the environment.
- 8.3. The degree of harm generally posed by all aspects of the development outweighs any perceived benefits that have been outlined which in any case, in the view of the WWPC, remain unproven.
- 8.4. The WWPC therefore respectfully request that this appeal is dismissed.

## **APPENDIX 1**

### **Long Open View Images From Footpath 12, Common Lane and Little Baddow Road**





## Key To Images

Images taken from footpath 12 to demonstrate the significant impact that the development will have.



Image 1



Image 2



Image 3

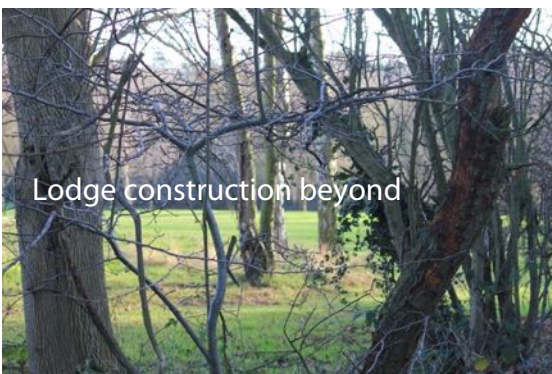


Image 4



Image 5

## Views from Footpath 12



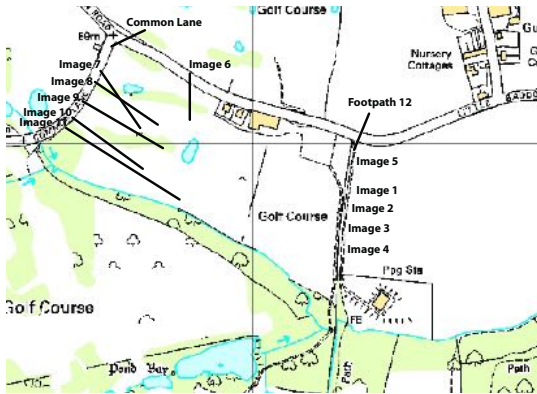


Image 6

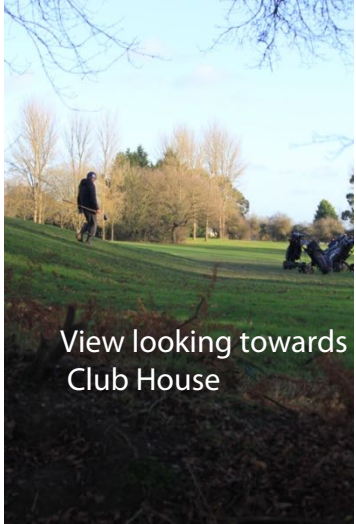
**Key To Images**

Images taken from Little Baddow Road and Common Lane showing the significant impact that the development will have.



Looking south-east towards Development

Image 7



View looking towards Club House

Image 8



Looking east towards the site Centre and backs of lodges.

Image 9



Looking southeast towards main Part of site

Image 10



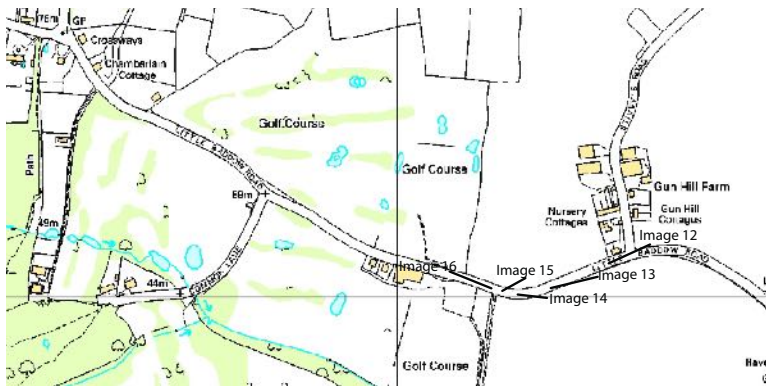
Looking towards the Development

Image 11

**Open views from Common Lane**



**Infrastructure Images From  
Little Baddow Road and Herbage Park Road  
and Road safety**



Key To Images.



Image 12



Image 13



Image 14

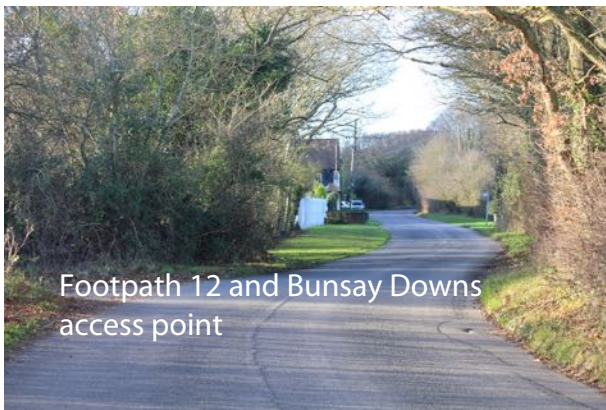


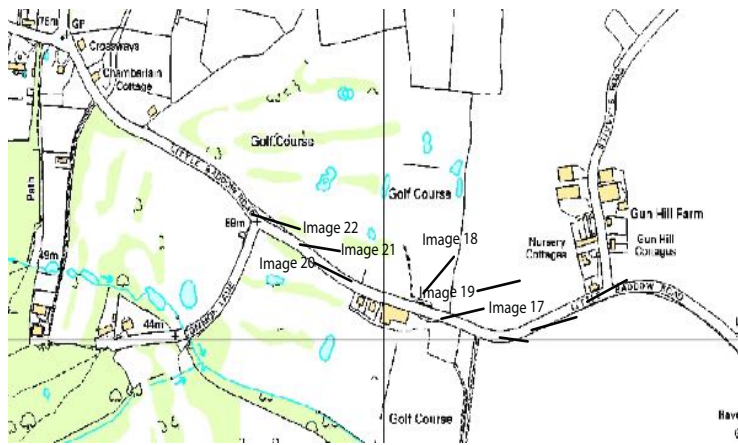
Image 15



Image 16

**Little Baddow Road Blind Bend From Stivvys Road**





Key To Images



Image 17



Image 18



Image 19



Image 20



Image 21

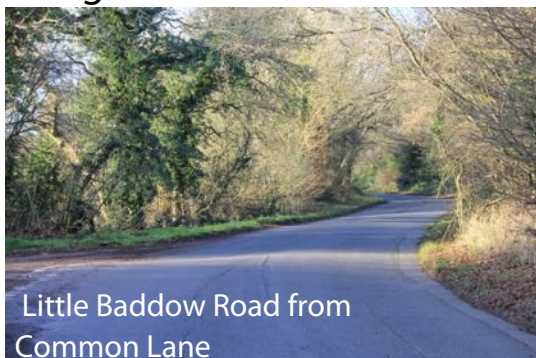
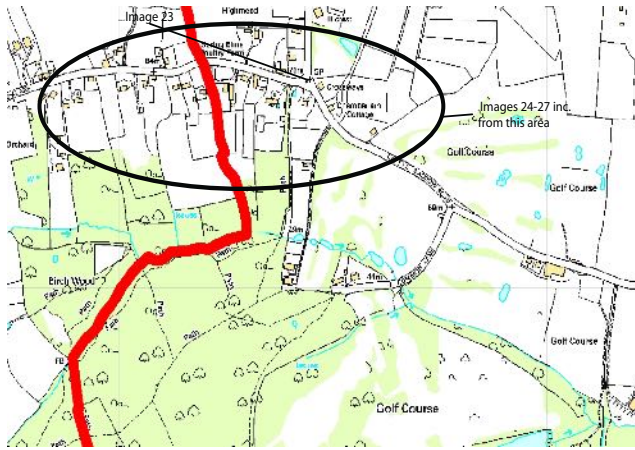


Image 22

## Little Baddow Road Bunsay Downs and Beyond





**Key To Images Illustrating Narrow Lanes To Bunsay Downs Approach Road**



Spring Elms Lane towards Basset's Road junction

**Image 23**



Spring Elms Lane single width carriageway

**Image 24**



Spring Elms Lane single width carriageway

**Image 25**



Narrow lanes and blind bends

**Image 26**



Narrow lanes and blind bends

**Image 27**

**Little Baddow Road Approach to Bunsay Downs**



Key Map of Warren Entrance



Image 28



Image 29



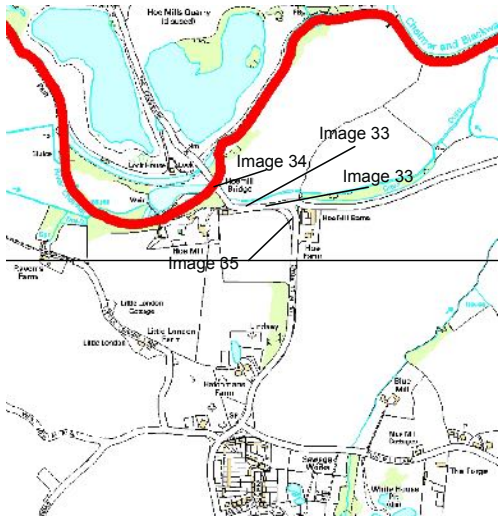
Image 30



Image 31

**Junction of Herbage Park Road, Old London Road and the Warren Entrance.**





Key Map of Hoe Mill Bridge



Area prone to regular flooding

Image 32



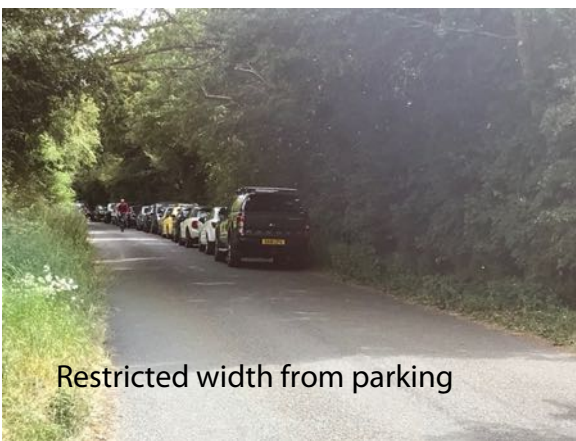
Hoe Mill bridge approach.

Image 33



Bridge width and weight restriction

Image 34



Restricted width from parking

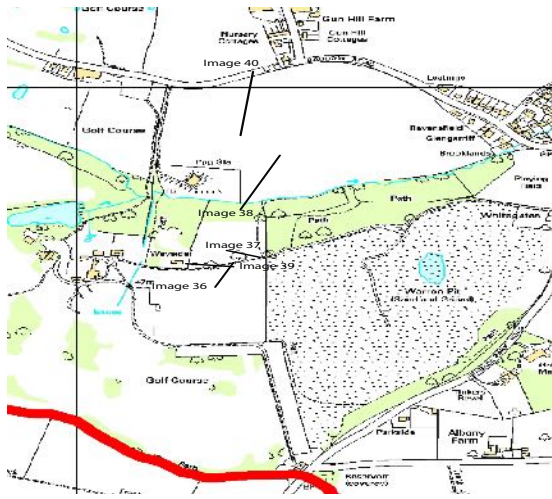
Image 35

Hoe Mill Bridge is the only river crossing in the Parish and has a weight and width restriction.

**Restricted Access to the Village from the north and Hatfield Peverel subject to flooding**

**Images of Site for 20 Lodges  
and  
The Old Pavilion and Bridleway 10**





Key Map of Site 2



Image 36



Image 37.



Image 38



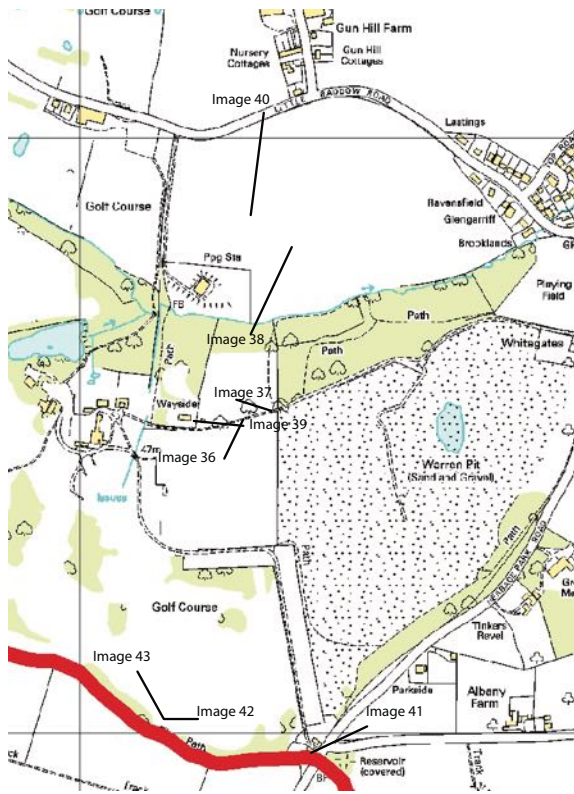
Image 39.



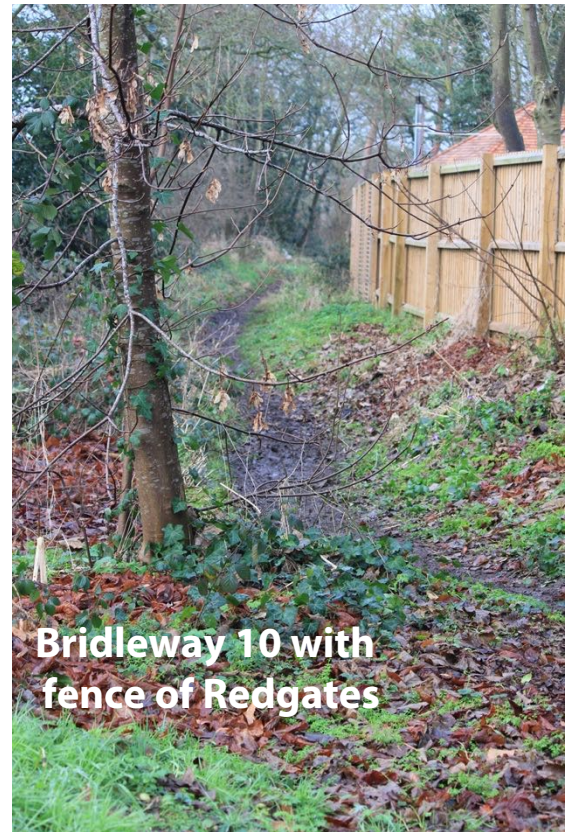
Image 40

**Development of Site 2 for 20 Lodges and associated Impact**





Key Map



**Bridleway 10 with fence of Redgates**

Image 41



**Bridleway 10 and pavilion.**

Image 40



**Bridleway 10 and pavilion from Redgates**

Image 41

**Relationship of bridleway 10 with Pavilion and Redgates**

## **APPENDIX 4**

### **Evidence of Badgers From Common Lane Running Into The Site**





**Images of Badger Set in Common Lane**

**Schedule of Accommodation  
Not Included in the Statement of Case**

### **List from Warren Appeal Document**

#### **Maldon District**

1. The Warren Estate, Herbage Park Rd, Woodham Walter, Maldon CM9 6RW
- 2 Happy Days Caravan Park, Goldhanger Rd, Heybridge, Maldon CM9 4QX
- 3 Barrow Marsh Caravan Park, Goldhanger Rd, Maldon CM9 4RA
- 4 Chigborough Farm and Fisheries, Chigborough Road, Maldon CM9 4RE
- 5 Mill Beach Seaside Resort , Goldhanger Rd, Maldon CM9 4RF
- 6 Osea Leisure Park, Goldhanger Road, Maldon CM9 4SA
- 7 Steeple Bay Holiday Park, Canney Rd, Southminster CM0 7RS
- 8 Creeksea Place Caravan Park, Ferry Rd Burnham-on-Crouch CM0 8PJ
- 9 Waterside Holiday Park, Main Road St Lawrence Bay, St Lawrence, Essex CM0 7LY
- 10 St Lawrence Holiday Park, 10 Main Road, St Lawrence Bay, St Lawrence, Southminster CM0 7LY
- 11 Rice & Cole Boatyard & Sea End Caravan Park, Burnham-on-Crouch CM0 8AN
- 12 Silver Road Caravan Park, Burnham-on-Crouch CM0 8LA
- 13 Eastland Meadows Country Park, E End Rd, Bradwell-on-Sea, Southminster CM0 7PP

#### **Additional Lodges and short break accommodation found (exc. Individual cottages, hotel, B&B etc)**

- Meadows Barn, Woodham Walter
- Retreat Farm, Woodham Walter
- Eastland Meadows Country Park, Bradwell on Sea
- The Star Inn Caravan Park, (inc. apartments) Southminster
- Hall Farm Cottages, Althorne

### **List from Warren Appeal Document**

#### **Colchester District**

- 14 Essex Golf & Country Club, Earls Colne, Colchester C06 2NS
- 15 Colchester Country Park, Cymbeline Way, Colchester CO3 4AG
- 16 West Mersea Holiday Park, Seaview Ave, West Mersea, Colchester CO5 8DA
- 17 Waldegraves, Mersea Island, Colchester, Essex, C05 8SE
- 18 Coopers Beach, Mersea Island, Essex C05 8TN
- 19 Fen Farm Caravan Site, Moore Lane, East Mersea CO5 8FE
- 20 Mersea Island Holiday Park, Fen Lane, Colchester CO5 8UA

#### **Additional Lodges and short break accommodation found (exc. Individual cottages, hotel, B&B etc)**

- White Lily Lodge at White Colne
- Wakes Hall Lodges at Wakes Colne
- Carpenters Farm Holidays at Great Bentley
- Fen Farm Caravan Park, Colchester

- Grange Farm Park, Colchester
- Browning Bros, Great Tey, Colchester
- Appletree Lodges, Leavenheath, Colchester
- Rye Farm Self Catering, Layer de la Haye
- Blackbrooks Lodges, Great Horksley, Colchester
- Rockinghams Farm, Colchester

### **List from Warren Appeal Document**

#### **Tendring District**

21. Weeley Bridge Holiday Park, Weeley Bridge, Clacton-on-Sea, CO16 9DH
- 22 Oakleigh Residential Park, Clacton Road, Weeley, Clactonon-Sea CO16 9DH
- 23 Elm Farm Holiday Park, Frinton Road, Thorpe-le-Soken, CO16 0JE
- 24 Homestead Lake Holiday Park, Thorpe Road, Weeley, Clacton-on-Sea, CO16 9JN
- 25 Highfield Grange, London Rd, Clacton-on- Sea CO16 9QY
- 26 Valley Farm Holiday Park, Valley Rd, Clacton-on-Sea CO15 6LY
- 27 Seawick Holiday Park, Beach Rd, St. Osyth, Clacton-on-Sea CO16 8SG
- 28 St. Osyth's Beach, St. Osyth, Clacton-on- Sea, CO16 8SG
- 29 Orchards Holiday Village, St. Osyth, Clacton-on-Sea, CO16 8LJ
- 30 Martello Beach, Clacton-on-Sea, CO15 2LF

#### **Additional Lodges and short break accommodation found (exc. Individual cottages, hotel, B&B etc)**

- Dovercourt Holiday Park, Harwich
- Oaklands Holiday Park, Clacton-on-Sea
- Firs Caravan & Lodge Park, Little Clacton
- Saddlebrook Chase Park, Clacton on Sea
- Hutleys Caravan Park, Clacton on Sea
- New Hall Lodge Park, Harwich
- Stone Lane Caravan Site, Wrabness
- Naze Marine Holiday Park, Walton on the Naze
- Haven, The Orchards, Clacton on Sea

#### **Plus, in other Essex locations**

- Millhouse Cararvan Park, Little Baddow
- Riverside Village holiday Park, Rochford Essex
- Thorney Bay Park, Canvey Island
- Roydon Marina Village, Harlow Essex
- Kingfisher Lodge Park, Hockley
- Stubbers Adventure Centre, Upminster
- Serenity lakes, Helions Bumpstead, Essex
- South Park, Braintree
- Kings Park Village, Canvey Island
- Oakwrights Boutique Self Catering, Terling
- Rettendon Lodges, Battlesbridge

- Lakeland Yurts, Hatfield Peverel
- Golden Grove, Braintree
- Rockingham Pods, Layer Marney
- Lee Valley Caravan Park, Herts/Essex Border (inc. Lodges) (Found on Visit Essex website)
- Landy Campers, Broxted, Dunmow
- Great Lodge, Great Bardfield, Braintree

In addition to the additional short term holiday accommodation listed above, there are also numerous cottages and holiday homes, camping and caravanning sites, hotel accommodation, Pubs & Inns, boat accommodation, Bed & Breakfast as well as multiple Air B&B rentals etc.

**Sources include:**

Google searches for Essex Holidays, Essex Lodges, Essex Activity Holidays, Essex Holiday Parks etc

<https://www.ukparks.com/county/essex/>

[https://www.pitchup.com/lodges/England/South\\_East/Essex/](https://www.pitchup.com/lodges/England/South_East/Essex/)

<https://www.visitessex.com/accommodation>