

# Consolidated Parish Council Objections and Evidence

## Foxbridge Golf Club – Outline Application 22/02346/OUT

### 1. Introduction and Purpose of This Document

Plaistow and Ifold Parish Council has consistently objected to the proposed development at Foxbridge Golf Club since 2022. During this extended period, a significant volume of representations, technical responses and supporting evidence has been submitted by the Parish Council and its advisers. Given the length of time the application has remained undetermined, and the number of documents now on the public planning record, the Parish Council is concerned that individual objections, evidence or lines of reasoning raised at different stages may be overlooked or given insufficient weight.

This document has therefore been prepared to provide a single, clear and structured consolidation of **all Parish Council objections drawn solely from the Parish Council's own submissions and commissioned evidence**. It is intended to assist the Local Planning Authority by setting out, in an accessible and indexed form, the full breadth of objections and the planning harm identified.

Where relevant, this document also reflects **updated positions or clarified evidence**, while remaining faithful to the substance of earlier objections. For the avoidance of doubt, **water neutrality is no longer relied upon as a reason for objection**. However, **drainage, foul sewerage and wastewater management concerns remain valid and unresolved**, and are included.

This document should be read alongside the original Parish Council submissions on the planning portal, which remain extant and material to the determination of the application.

### 2. Summary of Principal Objections

In summary, the Parish Council maintains that the application should be refused for the following principal reasons:

- The proposal represents a **large-scale, unjustified and unsustainable form of development in open countryside**, fundamentally contrary to adopted planning policy.
- The **scale, quantum and intensity** of development is wholly inappropriate for the location and far exceeds what could reasonably be considered small-scale or countryside-related development.

- The development would cause **significant and irreversible harm to landscape character**, tranquillity, dark skies and the intrinsic rural qualities of the area.
- The site is in an **inherently unsustainable location**, poorly served by public transport and reliant on private car use for staff, visitors and servicing.
- The proposal fails to demonstrate any **essential local or countryside need**, nor that the development must be located in this rural location.
- The development would result in **harm to the setting of heritage assets**, including historic farmsteads and listed buildings, and the wider historic landscape.
- **Ecological impacts have not been adequately assessed or mitigated**, and there are deficiencies and inconsistencies across the submitted ecological information.
- **Drainage and foul sewerage arrangements lack sufficient certainty**, posing a risk to the environment and local infrastructure.
- The application documentation, taken as a whole, suffers from **internal contradictions, omissions and evidential gaps**, which undermine confidence that the impacts of the proposal have been properly understood.

### 3. Site Context and Planning Status

The application site lies wholly outside any defined settlement boundary and is unequivocally located in the countryside for the purposes of the development plan. The surrounding area is characterised by small-scale farms, scattered dwellings, narrow historic lanes, dark skies and a high degree of tranquillity. These characteristics are consistently identified in the Council's own landscape evidence base and have been upheld in multiple appeal decisions in the locality.

The application is submitted in outline form, with only means of access to be determined at this stage. The Parish Council has consistently objected to the use of an outline application for a proposal of this nature, scale and complexity, given the level of certainty required to assess landscape, transport, ecological and infrastructure impacts.

### 4. Consolidated Objections by Topic

#### 4.1 Principle of Development in the Countryside and Alleged 'Exceptional Circumstances'

##### **Refusal-focused summary:**

The Parish Council does not accept that the proposal is supported by any exceptional circumstances that would justify a departure from adopted countryside policies. The development represents a large-scale commercial leisure scheme which conflicts with the fundamental objectives of countryside protection and does not demonstrate a level of public benefit or necessity capable of outweighing the identified harms.

##### **Key supporting evidence:**

- Parish submissions consistently state that the proposal does not require a countryside location and could be delivered in more sustainable locations.
- The scale and intensity of the development are fundamentally at odds with policies that restrict development in the countryside to that which is essential, small-scale or genuinely rural in nature.
- No robust evidence is provided to demonstrate an overriding need, scarcity of alternative sites or unique locational requirements that would amount to exceptional circumstances.
- Claimed economic and tourism benefits are generic in nature and are not specific to this site or this rural location.
- Appeal decisions cited by the Parish Council demonstrate that inspectors give significant weight to countryside policy compliance and do not accept economic benefits alone as exceptional circumstances.
- The Parish Council has repeatedly highlighted that previous proposals for far smaller forms of development at or near the site have been refused or dismissed on appeal due to harm to rural character.

## **4.2 Scale, Quantum and Intensity of Development**

### **Refusal-focused summary:**

The scale, quantum and intensity of the proposed development are wholly inappropriate for its countryside location and would result in a form of development that is fundamentally out of character with the surrounding rural area, contrary to adopted planning policy.

### **Key supporting evidence:**

- The proposal comprises up to 121 holiday lodges, a spa with up to 50 bedrooms, a restaurant, farm shop, concierge building, extensive car parking and internal roads.
- Parish representations and commissioned landscape evidence conclude that this scale is wholly disproportionate to the surrounding pattern of hamlets, farmsteads and isolated dwellings.
- Previous appeal decisions near the site have found harm arising from developments as small as 3–10 dwellings.
- The level of activity generated by guests, staff, servicing and visitors would fundamentally alter the character of the area.

## **4.3 Landscape Character, Visual Impact and Tranquillity**

### **Refusal-focused summary:**

The development would fail to preserve the rural historic landscape and would result in significant and irreversible harm to landscape character, visual amenity and tranquillity arising from its scale, form and intensity; this harm is not justified by any public benefits and cannot be mitigated through reserved matters or planning conditions.

### **Key supporting evidence:**

- The Parish Council's commissioned Landscape and Visual Impact evidence concludes the site has insufficient landscape capacity for development of this scale.
- Identified harms include loss of tranquillity, erosion of rural character and the introduction of an incongruous holiday-village form.
- Harm would arise irrespective of reserved matters, as it flows from the nature, scale and access requirements of the development.
- Visual impacts would occur from local vantage points and during winter months, with cumulative effects not adequately addressed.

#### **4.4 Dark Skies and Lighting**

##### **Refusal-focused summary:**

The development would result in a material erosion of dark skies and rural night-time character, harming the wider setting of the South Downs National Park and conflicting with policies seeking to conserve tranquillity and landscape quality.

##### **Key supporting evidence:**

- The site currently experiences very low levels of artificial lighting and contributes to the wider rural setting of the South Downs National Park.
- Parish submissions identify shortcomings in the assessment of lighting impacts, including light spill, environmental zone changes and effects on dark skies.
- The introduction of extensive built form, vehicle movements and external lighting would materially change night-time character.

#### **4.5 Transport, Accessibility and Highway Safety**

##### **Refusal-focused summary:**

The development is located in an unsustainable rural location and would generate a significant increase in vehicle movements on narrow, unlit rural lanes that are unsuitable for the scale and intensity of traffic proposed, resulting in harm to highway safety and conflict with sustainable transport policy.

##### **Key supporting evidence:**

- The site is remote from settlements and services and is not reasonably accessible by public transport.
- Bus services serving Plaistow and Ifold are limited, infrequent and operate only on certain weekdays, with recent service reductions further undermining reliability.
- Parish Council transport evidence demonstrates that walking distances to the nearest bus stops are materially greater than stated in the applicant's Transport Assessment.
- The surrounding road network comprises narrow, historic rural lanes with no footways, poor forward visibility in places, and limited opportunities for passing.
- These lanes are regularly used by pedestrians, cyclists and horse riders, who would be exposed to increased risk from higher traffic volumes.

- The scale of traffic generated by guests, staff, deliveries and servicing would materially increase conflict on these lanes and erode their rural character.
- Appeal decisions cited by the Parish Council confirm that reliance on private car travel in rural locations weighs heavily against proposals, even at a much smaller scale.

#### **4.6 Sustainability, Visitor Movements and Reliance on the Private Car**

##### **Refusal-focused summary:**

The proposal represents an unsustainable pattern of development which would be heavily reliant on private car travel for guests, staff and servicing, resulting in increased traffic generation and conflict with sustainable transport objectives.

##### **Key supporting evidence:**

- The site is remote from services and settlements, meaning staff, guests and servicing vehicles would be heavily reliant on private cars.
- There are relatively few visitor attractions or facilities within walking or cycling distance of the site.
- This would result in regular out-and-back car journeys to surrounding towns and attractions, significantly increasing traffic generation.
- Parish submissions conclude that the proposal fails to minimise travel demand and conflicts with sustainable transport objectives.

#### **4.7 Ecology and Biodiversity (excluding Water Neutrality)**

##### **Refusal-focused summary:**

Insufficient and inconsistent ecological evidence particularly regarding Bats means the Local Planning Authority cannot be confident that harm to biodiversity, protected species and ecological networks would be adequately avoided or mitigated.

##### **Key supporting evidence:**

- Parish ecology responses identify inconsistencies and gaps across submitted ecological surveys and mitigation proposals.
- There is concern that impacts on protected and priority species and red listed have been underestimated.
- Bat surveys fail to identify the significance of Near Threatened / Vulnerable bat species
- Bat surveys were undertaken using 2016 guidelines which are out of date for a decision being made in 2026. Guidelines were updated in 2023 with more rigorous standards
- Reliance on future mitigation strategies and conditions introduces uncertainty regarding deliverability and effectiveness.

#### **4.8 Drainage, Foul Sewerage and Wastewater Management**

##### **Refusal-focused summary:**

The proposed development lacks sufficient certainty regarding foul drainage and

wastewater arrangements, and reliance on future consents and conditions is inappropriate given the scale of the proposal and the sensitivity of the location.

**Key supporting evidence:**

- Parish submissions highlight uncertainty around foul drainage capacity and wastewater disposal arrangements.
- Proposed solutions rely on future stages, conditions and third-party approvals, reducing certainty at outline stage.
- The Parish Council considers this lack of certainty unacceptable given the scale of development proposed.

## **4.9 Economic Claims and Alleged Local Benefits**

**Refusal-focused summary:**

The claimed economic and tourism benefits are generic, site-unspecific and insufficient to outweigh the significant policy conflicts and environmental harm identified and therefore do not justify approval.

**Key supporting evidence:**

- Claimed economic benefits are generic and could be delivered in more sustainable locations.
- Parish submissions question the weight attributed to these benefits when set against clear policy conflicts and environmental harm.
- There is no robust evidence that benefits would outweigh the identified harms.

## **4.10 Coherence, Evidential Gaps and Decision-Making Risk**

**Refusal-focused summary:**

The scale of evidential gaps, contradictions and deferred matters within the application documentation creates unacceptable uncertainty and risk, preventing a robust and lawful planning decision in favour of the proposal.

**Key supporting evidence:**

- Parish Council representations identify contradictions and omissions across the application documentation.
- Key issues are deferred to future stages, undermining confidence in the assessment of impacts.
- The volume and length of documentation increases the risk that earlier objections may be overlooked without a consolidated approach.

## **5. Relevant Appeal Decisions and Cited Cases**

The Parish Council has consistently drawn attention to recent appeal decisions which demonstrate the continued robustness of countryside and sustainability policies within the District, including:

- **Goose Cottage, Durbans Road, Wisborough Green (APP/L3815/W/22/3302155, February 2023):** Appeal dismissed due to unsustainable location, reliance on private car travel and failure to meet an essential local rural need.
- **Land at Manor Copse Farm, Oak Lane, Shillinglee (APP/L3815/C/21/3283324 and 3283325, May 2023):** Enforcement appeals dismissed, confirming strict application of countryside policies and the need for essential local rural justification.
- **Foxbridge Golf Club – prior appeal (APP/L3815/W/18/3206819, May 2019):** Appeal dismissed for 10 dwellings due to harm to rural and undeveloped character.
- Additional local appeal decisions cited within Parish submissions which reinforce the protection of rural character, tranquillity, dark skies and highway safety.

These cases demonstrate that even modest forms of development have been refused where they conflict with countryside policies, further underlining the Parish Council's objection to the scale and nature of the current proposal.

## 6. Planning Balance

When assessed against the development plan as a whole, the Parish Council considers that the adverse impacts of the proposal are significant and demonstrable. The development conflicts with multiple core policies relating to countryside protection, landscape, sustainability, transport and design. The claimed benefits do not outweigh these harms.

## 7. Conclusion

For the reasons set out above, and as consistently articulated in its submissions since 2022, Plaistow and Ifold Parish Council maintains its strong objection to the proposed development at Foxbridge Golf Club. The Parish Council respectfully submits that the application should be refused.