

REPORT of INTERIM HEAD OF PLANNING SERVICES

NORTH WESTERN AREA PLANNING COMMITTEE 06 MARCH 2017

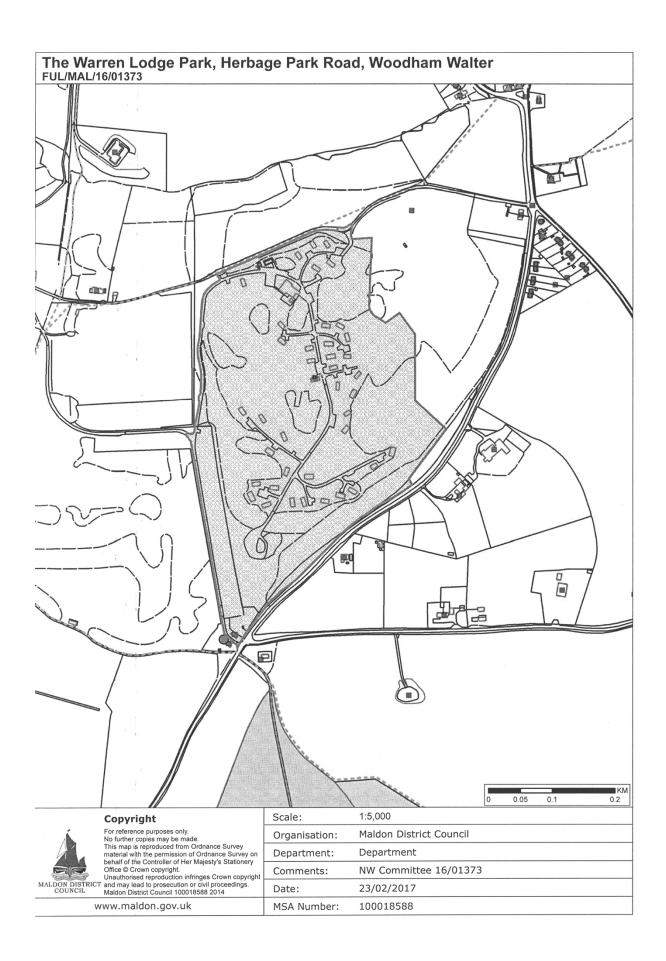
Application Number	FUL/MAL/16/01373	
Location	The Warren Lodge Park Herbage Park Herbage Park Road	
Location	Woodham Walter Essex	
Proposal	28 new holiday lodges with associated infrastructure and access	
Applicant	The Warren Estate	
Agent	Mr D Wallis - Smart Planning Ltd	
Target Decision Date	9 March 2017	
Case Officer	Yee Cheung, TEL: 01621 876220	
Parish	WOODHAM WALTER	
Reason for Referral to the	Major Application	
Committee / Council		

1. <u>RECOMMENDATION</u>

APPROVE subject to the conditions (as detailed in Section 8 of this report).

2. <u>SITE MAP</u>

Please see overleaf.



3. **SUMMARY**

3.1 Proposal / brief overview, including any relevant background information

- 3.1.1 The application site is situated outside of the defined settlement boundary of Woodham Walter and falls within the designated Chelmer/Blackwater Ridges Special Landscape Area. The land forms part of an overall leisure complex incorporating holiday lodges, the Warren Golf Club and Bunsay Downs golf courses including clubhouses and ancillary facilities. The site was a former quarry but restored via natural re-colonization of species and is now referred to as 'Herbage Park'.
- 3.1.2 There is a long strip of woodland to the site's northern boundary that forms part of a green corridor from the village of Woodham Walter off to the west through the 'Badgers' course of the Bunsay Downs range. A public footpath is within this woodland and links this area back to the parish church and public playing fields on Church Hill.
- 3.1.3 Access is via the principal access to the Warren golf course, being a single lane made track linking to the junction of Old London Road and Herbage Park Road between a pair of cottages known as No. 1 and No. 2 Redgates.
- 3.1.4 Planning permission was granted in 2006 by planning application FUL/MAL/05/00798) and 2012 by planning application (FULMAL/11/00953) to place 48 and 26 holiday lodges within the site.
- 3.1.5 The current application seeks to add an additional 28 holiday lodges within the site. The holiday lodges would be interspersed to the north, east, south east, west and north west of the site amongst the existing lodges.

3.2 Conclusion

3.2.1 The planning application for the proposal of 28 holiday lodges is considered to be acceptable as the development meets policy requirements contained within REC20 'Static and Touring Caravan Sites, Chalet Sites and Camping Sites' of the adopted local plan, policy E5 of the Local Development Plan, and Government advice in the National Planning Policy Framework.

4. MAIN RELEVANT POLICIES

Members' attention is drawn to the list of background papers attached to the agenda.

- 4.1 National Planning Policy Framework 2012 including paragraphs:
 - 7, 8, 14, 17, 28
- 4.2 Maldon District Replacement Local Plan 2005 Saved Policies:
 - S2, BE1, CC2, CC6, T2, REC20

- 4.3 Maldon District Local Development Plan submitted to the Secretary of State for Examination-in-Public on 25 April 2014:
 - S1, D1, H4, N2, T2, E5

4.4 Relevant Planning Guidance / Documents:

- National Planning Policy Guidance (NPPG)
- National Planning Policy Framework (NPPF)

5. <u>MAIN CONSIDERATIONS</u>

5.1 Principle of Development

- 5.1.1 The current adopted Local Plan (Paragraph 8.87) recognises that the tourist industry is an important source of income and employment in the District. It also recognises that the Council may be flexible and allow some development to existing sites, providing it is reasonable to do so and would secure environmental improvements to the existing site. This Plan seeks to maintain the high environmental quality of the coast and countryside, in particular its remote, isolated and open nature. For these reasons, it is essential that any development proposals affecting existing sites are strictly controlled, taking into account the Plan's development strategy and its policies on the coast and countryside.
- 5.1.2 In determining this application, it is considered Local Plan policy REC20 (Static and Touring Caravan Sites, Chalet Sites and Camping Sites) would be pertinent to this case. The first part of this policy states that:-

Planning permission will only be granted for new static and touring caravan sites, chalet sites and camping sites or extensions to existing facilities where all of the following criteria are satisfied:

- (a) A need for the additional tourist accommodation can be demonstrated;
- (b) The proposal involves the use of previously-developed land and existing rural buildings or replaces existing agricultural buildings;
- (c) Landscaping and site layout of the development complement and enhance views into and across the site;
- 5.1.3 Policy E5 of the Local Development Plan provides a more up to date position and is NPPF compliant when compared to Local Plan policy REC20. Policy E5, in summary, seeks support tourism across the District providing there is a need, there are good connections to other tourist destinations, and there would be no significant impact upon amenity or the natural and historic environment. The policy, however, is silent on caravan site uses and their occupation. Previously, the most recent approach to occupancy of caravan parks was outlined in the Good Practice Guide to Tourism which provided a more update version than that applied through Policy REC20 from the Local Plan in that planning conditions should ensure the accommodation is only used for holiday purposes only, that the accommodation is not used as a person's sole/main residence, and that an up to date register is maintained. In addition, those

- suggested conditions this Council has imposed an additional time limit condition limiting the occupation of a caravan for 28 days.
- 5.1.4 The general policy approach is therefore supportive for the principle of the proposal. The main issue for consideration is whether the additional holiday lodges would result in demonstrable harm or adversely impact on the rural landscape.
- 5.1.5 In terms of sustainability, the application site is located in a rural location and is an established caravan park on site which is operational and provides benefits to the local tourism economy of the District. It is noted that the site is in a remote location with poor access to a reasonable range of services and facilities. As such, the site is not considered to be suited for permanent residential occupation other than periodic holiday purposes. Also, the permanent occupation of the holiday lodges would be in direct conflict with adopted Local Plan policies, particularly S2 and T1 and Policies S1, S8 and T1 of the Local Development Plan and the core planning principles as contained within the NPPF which steers permanent housing to or adjacent to settlements with good access to a wide range of services, community facilities, employment and public transport.
- 5.1.6 With regard to any concerns over permanent residential occupation of the site beyond the dates specified by the Applicant, this would result in a breach of the planning conditions in which could result in future enforcement action against the Applicant. For consistency, any planning conditions imposed on the new 28 holiday lodges would be in line with the existing lodges that were previously approved on site.

5.2 Design and Impact on the Character of the Area

- 5.2.1 The holiday lodges proposed are of single-storey in height. Each lodge would measure approximately 11.4 metres wide, 6.5 metres deep with a shallow roof pitch. The height of the lodges would be no higher than 4.1 metres. Based on the Drawing No: 15.3071/P204 dated 26 August 2015 submitted, it shows that each lodge would have two bedrooms, a bathroom, kitchen and lounge.
- 5.2.2 The holiday lodges would be positioned within the bowl and basin of the former gravel pit. It is noted that some of the holiday lodges around the perimeter of the site would be positioned on a cliff-type escarpment. While these new lodges may appear 'high' and 'prominent' when viewed by the existing lodges that are centrally positioned and where the site gradient is at its lowest, but when the lodges are viewed at a distance and against the backdrop of the existing soft landscaping and boundary treatment, the visual impact of the development and its impact on the wider landscape would not be considered harmful to the rural landscape to warrant refusal.

5.3 Impact on Residential Amenity

5.3.1 Policy BE1 of the adopted Local Plan states that development proposals will be permitted if: a) They are compatible with their surroundings, and/or improve the surrounding location in terms of:- vii) the effect on the safety and or amenity of neighbouring properties or the occupiers therein. The Local Development Plan policy relevant to this section is Policy D1 which considers similar residential amenity considerations to Policy BE1 of the adopted Local Plan.

5.3.2 Besides the existing holiday lodges within the site, there are no neighbouring residential properties that would be directly affected by this development proposal.

5.4 Access, Parking and Highway Safety

- 5.4.1 This section of the report needs to be assessed with adopted Local Plan policies T1 Sustainable Transport and Location of New Development, T2 Transport Infrastructure in New Developments, T6 Improvement to Pedestrian Facilities and T8 Vehicle Parking Standards, as well the NPPF. The LDP policies relevant to this section are T1 Sustainable Transport and T2 Accessibility.
- 5.4.2 Letters of representation have been received concerning the level of traffic to and from the site as a result of this development proposal. Whilst it is noted that the additional 28 holiday lodges would result in an increase in traffic, it is not considered that the level would be significant harm to the area to warrant refusal.
- 5.4.3 The access to the site, which is shared with the golf club and course, would not be affected by this development proposal or result in any significant impact upon the local highway network. The Highway Authority has raised no objection or has made comments to this application.

5.5 Nature Conservation

- 5.5.1 Paragraph 109 of the NPPF states that 'the planning system should contribute to and enhance the natural and local environment by..... recognising the wider benefits or ecosystem services......and minimising impacts upon biodiversity and providing net gains in biodiversity where possible'. Policy CC5 of the adopted Local Plan (Protection of Wildlife on Development Sites) seeks to protect animals and plants protected under law unless steps for their protection are satisfactory through the planning application process. This policy is reflected in Policy N2 of the Local Development Plan which seeks to protect the District's natural environment, geodiversity and biodiversity.
- 5.5.2 Concerns have been raised with regard to the impact of development on the local wildlife. As part of the planning application in 2011 for the 26 holiday lodges (FUL/MAL/11/00953), a S106 legal agreement was submitted and signed between the relevant parties to ensure that the area of land to the north east of the site remains as an area for nature conversation and ecological purposes. This legal agreement still stands with this current application. As such, it is not considered that the development would not adversely affect the natural environment and biodiversity of the rural area to justify refusal.

5.6 Other Material Considerations

5.6.1 Issues have been raised with regard to details of bins / waste collection point. Whilst this issue was addressed in a previous planning application for the construction of 26 lodges in 2011, the bins / waste collection point would not have been included back then for this development 6 years on. As such, it is not considered unreasonable for the Council to impose a condition for the Applicant to submit further details regarding the additional 28 holiday lodges which would not have been covered in the 2011 application.

- 5.6.2 In the previous planning application for the 48 and 26 holiday lodges, the Council's Environmental Health Services (EHS) requested details regarding a comprehensive site management plan for the whole site to be submitted to and approved in writing by the local planning authority. The comprehensive site management plan would have included mitigation measures to limit light, noise and disturbance from guests upon the local wildlife and the amenities of other occupiers, as well as the means to control and limit pollutants upon the surroundings. However, this information was not requested in this current application by EHS and as such, it would be unreasonable for the Council to impose a condition for the Applicant to submit such details for approval prior to the commencement of development on site.
- 5.6.3 Letters of representation was received concerning emergency vehicles entering the site in the event of a fire. Essex County Fire & Rescue Service have been consulted and advised that the access, facilities and water hydrants for the development would be considered at Building Regulation consultation stage.

6. ANY RELEVANT SITE HISTORY

- FUL/MAL/01/00120 Use of gravel pit for recreational purposes (mountain boarding). Approved 24.05.2001.
- FUL/MAL/02/00462 Retention of planning permission ref: FUL/MAL/01/00120 (use of gravel pit for recreational purposes (mountain boarding) without compliance with condition No. 1 to allow the use on a permanent basis). Approved 28.06.2002.
- FUL/MAL/05/00798 Change of use of disused gravel pit to site for 48 holiday lodges with formation of associated access tracks, landscaping and construction of central administrative and facilities building. Approved 25.01.2006.
- FUL/MAL/07/01159 Location of temporary show home for a six month period. Approved 29.11.2007.
- FUL/MAL/11/00953 Proposed addition of 26 new timber holiday lodges plus associated infrastructure within the existing Herbage Park Holiday Park. Approved: 13.09.2012.
- FUL/MAL/15/00590 Variation of condition 3 on approved planning permission FUL/MAL/11/00953 (Proposed addition of 26 new timber holiday lodges plus associated infrastructure within the existing Herbage Park Holiday Park) Variation: holiday accommodation occupancy period. Variation of condition 2 on approved planning permission
- FUL/MAL/05/00798 (Change of use of disused gravel pit to site for 48 holiday lodges with formation of associated access tracks, landscaping and construction of central administrative and facilities building) Variation: holiday accommodation occupancy period. Approved: 21.09.2015.

7. CONSULTATIONS AND REPRESENTATIONS RECEIVED

7.1 Representations received from Parish / Town Councils

Name of Parish / Town	Comment	Officer Response
Council		Officer Response
Woodham Walter Parish Council	i. The 'defined benefits' do not outweigh the loss of landscaped areas contrary to NPPF 14 and 28 ii. Overdevelopment of the site contrary to Policy D1 of the Maldon District Local Development Plan as submitted. iii. Detracts from the character, local distinctiveness, and landscaping of the area. Contrary to D1, E5 of the Maldon District Local Development Plan as submitted. iv. Does not maintain the rural character of the village. Contrary to S1 of the Maldon District Local Development Plan as submitted. v. It is outside of the defined settlement area and therefore appears noncompliant with S8 of the Maldon District Local Development Plan as submitted. vi. Design of lodges is alien to the rural community and against the principles of the emerging Woodham Walter Village Design Statement and Policy D1 of the Maldon District Local Development Plan as submitted. vii. Concern over excessive and additional vehicle movements at the Red Gates junction contrary to T2 of the Maldon District Local Development	Noted

Name of Parish / Town Council	Comment	Officer Response
	Plan as submitted.	

7.2 Statutory Consultees and Other Organisations (summarised)

Name of Statutory Consultee / Other Organisation	Comment	Officer Response
Highway Authority	No comments to make on this application	Noted
Essex County Fire & Rescue Service	More detailed observations on access and facilities for the Fire Service will be considered at Building Regulation consultation stage.	Noted
Essex County Fire & Rescue Service (Water Supplies)	Due to the distance between the existing water hydrants and the new lodges, it would be necessary to install new water hydrants	Noted
Environment Agency	No comments received at the time of writing this report	Any comments received will be presented on the Members Update

7.3 Internal Consultees (summarised)

Name of Internal Consultee	Comment	Officer Response
Environmental Health Services	No objection in principle subject to the compliance to the site licence in accordance with the Caravan Sites and Control of Development Act 1960	Noted
Economic Development	No objections to the above application.	
Tree Officer	No objection	Noted

7.4 Representations received from Interested Parties (summarised)

- 7.4.1 Letters were received **objecting** to the application from the following and the reasons for objection are summarised as set out in the table below:
 - Mr. LAP French, The Batteries, Claxfield Road, Lynsted, Kent
 - Mr Graham Bannerman, Burnt House, Stivvys Road, Woodham Walter Maldon, Essex
 - Mrs Rita Jupp, 58 Priory Road, Bicknacre, Chelmsford, Essex

- David Whittel (Lodge 8) 3 Jenner Close, Braintree, Essex
- Andrew Vesey, Calderbank, Little Baddow Road, Woodham Walter
- Alan Houston, 39 Warren Lodge Park, Warren Estate, Woodham Walter
- Chris Gore, Poldhu, Lt Baddow Rd, Woodham Walter, Maldon
- Mr Alf Mancktelow, 1 Saltcote Maltings, Heybridge, Maldon, Essex
- Christina Page, Parkside, Herbage Park Road, Woodham Walter Maldon, Essex
- J Williams, Beightons, Bassetts Lane, Little Baddow, Chelmsford
- Mr and Mrs Felts, 12 Oliver Court, Crouchfields, Ware, Herts

Objection Comment	Officer Response
The development will go on for	•
years	
 Increase in noise - impacting on 	
the local community	
 Anti-social behaviour from 	
visitors	
 Increase in traffic i.e. onto the 	
junction of the A414 / increase in	
vehicle movement	
 The lodges would be used as 	
permeant homes	
This area will become a housing	
estate	
 Overdevelopment of the site 	
 Privately owned holiday homes 	
Light pollution and	
 Impact on wildlife 	
 No details of bins / waste 	
collection	N. 4. 1
 No details regarding to the 	Noted
provision water hydrants in the	
event of a fire	
Not a sustainable development	
• There are no shops in the village	
Should the application be	
approved, the following	
restrictions should be in place: No	
dogs allowed; No drones or quad	
bikes or similar machines to be	
allowed on the site; No expansion	
of clubhouse facilities, no outdoor music licence or alcohol licences	
to be granted; and The planning	
permission given in 2005 for a	
board walk to be built through the	
woodland area between the	
lodges and Bunsay Downs (which	
has not been built) should be	
rescinded.	

Objection Comment	Officer Response
 Impact on the trees 	
 Need to analysis the financial 	
records of the development	
• The site looks like a travellers site	
 People are living there all year 	
round	
 No street lightings or pavements 	
for visitors	

- 7.4.2 Letters were received **in support** of the application from the following and the reasons for support are summarised as set out in the table below:
 - Mrs Sarah Maxted, Holly Lodge, Hop Garden Lane, Woodham Walter Maldon, Essex

Supporting Comment	Officer Response
Woodham Walter needs to move forward	

- 7.4.3 Letters were received **commenting** on the application from the following, summarised as set out in the table below:
 - Derek Renaud, Lodge 44 Warren Lodges, Woodham Walter

Comment	Officer Response
Q1. When you visited the site in connection with your decision on this application?	The Economic Development team is very familiar with the site. The most recent visit was prior to Christmas 2016.
Q2. Who you have spoken to from either the applicant or existing residents or other interested parties at the site and when (approximately)?	Economic Development's interest is in addressing known and ongoing demand for visitor/tourist accommodation across the District. The topic is regular brought to our attention by local businesses who find it difficult to locate suitable accommodation for visiting contractors, and more recently the Maldon & Blackwater Estuary Coastal Community Team who have raised the issue of 'lack of tourist accommodation' as a reason why overnight stays in the District fell by 4% in 2015. The lack of suitable tourist accommodation has a measurable impact on overall tourism spend and the number of jobs which can be supported in this key sector.
Q3. What factors you have taken into account in balancing the opposing effects of economic development verses quality	"The observations of the Economic Development Officer do not constitute an agreement to the planning application,

Comment	Officer Response
of life as required to meet District	but are made in respect of the District's
Economic Prosperity Strategy?	Economic Prosperity Strategy which seeks to 'Maintain a vibrant and competitive economy, balancing the needs of industry and prosperity whilst sustaining a high quality of life, increasing incomes and promoting the Maldon District as a great place to live, play, work and do business'."
Q4. What views you formed with brief outline reasons from the factors in Q3. above in reaching you decision?	Economic Development Team has raised no objection to the proposal

8. PROPOSED CONDITIONS

APPROVE subject to the following conditions:

- The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

 REASON: To comply with Section 91(1) of The Town & Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004
- The development hereby permitted shall be carried out in complete accordance with the approved Location Plan No: 15.3071/M002 dated 18.04.2016 and Site Plan No: 15.3071/P201 Revision B dated 24.07.2015 and Plans and Elevations No: 15.3071/P204 dated 26.08.2015 specifically referenced on this decision notice.
 - <u>REASON:</u> To ensure that the development is carried out in accordance with the details as approved.
- No holiday lodges shall be used as a person's sole or main place of residence and shall be used for holiday purposes only.

 REASON: The application site lies outside any area where planning permission would normally be granted for residential development. The site is permitted for holiday purposes only in the interest of contributing to tourism and the local economy in accordance with Policy REC20 of the Maldon District Replacement Local Plan, policy E5 of the Maldon District Local Development Plan, and Government advice contained within the National Planning Policy Framework.
- The holiday lodges shall not be used for human habitation between 15 January and 28 January (inclusive).

 REASON: The application site lies outside any area where planning permission would normally be granted for residential development. The site is permitted for holiday purposes only in the interest of contributing to tourism and the local economy in accordance with Policy REC20 of the Maldon District Replacement Local Plan, policy E5 of the Maldon District Local Development Plan, and Government advice contained within the National Planning Policy Framework.

- The owners / operators of the site shall maintain an up-to-date register of the names of all owners / occupiers of individual holiday accommodation units on the site, dates of arrival and departure from the site, their main home addresses and place(s) of employment. The register shall be made available at all reasonable times for inspection and copying by the Local Planning Authority for record keeping purposes.
 - <u>REASON:</u> The application site lies outside any area where planning permission would normally be granted for residential development. The site is permitted for holiday purposes only in the interest of contributing to tourism and the local economy in accordance with Policy REC20 of the adopted Maldon District Replacement Local Plan, policy E5 of the Maldon District Local Development Plan, and Government advice contained within the National Planning Policy Framework.
- With the exception of any building or structure required to be provided by conditions on a site licence issued under the Caravan Sites and Control of Development Act 1960, no structures, tents or similar items shall be erected or placed on the site without the prior approval in writing of the Local Planning Authority.
 - <u>REASON:</u> To ensure the appropriate development and use of the site for recreational purposes in accordance with policy REC20 of the adopted Maldon District Replacement Local Plan.
- The use of the site for holiday purposes shall be undertaken only in conjunction with and ancillary to the use of The Warren Golf Club.

 <u>REASON:</u> To ensure the appropriate development and use of the site for recreational purposes in accordance with policy REC20 of the adopted Maldon District Replacement Local Plan.
- Notwithstanding the provisions of the Caravan Sites and Control of Development Act 1960, the location and siting of any timber holiday lodge shall only be in accordance with the layout plan which is attached to and forms part of this permission unless otherwise agreed in writing by the Local Planning Authority.
 - <u>REASON:</u> To ensure the appropriate development and use of the site for recreational purposes in accordance with policy REC20 of the adopted Maldon District Replacement Local Plan.
- Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any Order amending, revoking or reenacting that Order) no wall, fence, gate or other means of enclosure shall be erected within or around the site without the prior grant of planning permission by the Local Planning Authority.
 - <u>REASON:</u> To safeguard the appearance and character of the rural area in accordance with policies BE1, CC6 of the adopted Maldon District Replacement Local Plan, policies S1 and D1 of the Maldon District Local Development Plan, and Government advice contained within the National Planning Policy Framework.
- Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any Order amending, revoking or reenacting that Order) no hardstanding, access road or similar hard surface shall be laid within or around the site other than shown on the Site Plan No: 15.3071/P201 Revision B dated 24.07.2015 without the prior approval in writing by the Local Planning Authority.

<u>REASON:</u> To ensure the appropriate development and use of the site for recreational purposes in accordance with policy REC20 of the adopted Maldon District Replacement Local Plan.

11 No trees within the site shall be felled, cut back, damaged or removed, unless otherwise first agreed in writing with the Local Planning Authority. Prior to the commencement of the development fencing to protect the trees shall be erected in accordance with British Standard 5837 (Trees in relation to construction) unless otherwise agreed in writing. The protective fencing shall be erected before the commencement of any clearing, demolition and building operations and shall be retained until all equipment, machinery and surplus materials have been removed from the site. Within the fenced protection zone nothing shall be stored or placed, no fires lit, no vehicle shall gain access. ground levels shall not be altered, no excavation shall be made and no structure shall be erected, unless otherwise first agreed in writing with the Local Planning Authority. If within five years from the completion of the development an existing tree is removed, destroyed, dies, or becomes, in the opinion of the Local Planning Authority, seriously damaged or defective, a replacement tree shall be planted within the site of such species and size and shall be planted at such time, as specified in writing by the Local Planning Authority.

<u>REASON:</u> To secure the retention of the trees within the site in the interests of visual amenity and the character of the rural area in accordance with policy BE1 of the adopted Maldon District Replacement Local Plan and policy D1 of the Maldon District Local Development Plan, and Government advice contained within the National Planning Policy Framework.

12. Details of the means of refuse storage including details of any bin stores to be provided shall be submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the agreed details and provided prior to the first occupation of the development and retained for such purposes at all times thereafter.

REASON: To ensure adequate refuse facilities are available in accordance with policy BE1 of the adopted Maldon District Replacement Local Plan and

INFORMATIVES

1) This application should be read in conjunction with the S106 legal agreement which formed part of planning application FUL/MAL/11/00953 which relates to nature conservation and the ecological management of the site.

policy D1 of the Maldon District Local Development Plan.

- All work within or affecting the highway is to be laid out and constructed by prior arrangement with and to the specifications of the Highway Authority; details shall be agreed before the commencement of works. The applicants should be advised to contact the Development Management Team by email at development.management@essexhighways.org or by post to:

 SMO2 Essex Highways, Springfield Highways Depot, Colchester Road, Chelmsford, CM2 5PU
- 3) Water Supplies

The architect or applicant is reminded that additional water supplies for firefighting may be necessary for this development. The architect or applicant is urged to contact the Water Technical Officer at Service Headquarters, telephone 01376-576344.

4) Sprinkler Systems

The architect or applicant is advised that "There is clear evidence that the installation of Automatic Water Suppression Systems (AWSS) can be effective in the rapid suppression of fires. Essex County Fire & Rescue Service (ECFRS) therefore uses every occasion to urge building owners and developers to consider the installation of AWSS. ECFRS are ideally placed to promote a better understanding of how fire protection measures can reduce the risk to life, business continuity and limit the impact of fire on the environment and to the local economy.

Even where not required under Building Regulations guidance, ECFRS would strongly recommend a risk based approach to the inclusion of AWSS, which can substantially reduce the risk to life and of property loss. We also encourage developers to use them to allow design freedoms, where it can be demonstrated that there is an equivalent level of safety and that the functional requirements of the Regulations are met."