

Stakeholder Reference:

Document Reference:

## Part A

### Making representation as Resident or Member of the General Public

Personal Details		Agent's Details (if applicable)
Title	Mr	
First Name	Roger	
Last Name	Driscoll	
Job Title (where relevant)		
Organisation (where relevant)		
Address		
Post Code		
Telephone Number		
E-mail Address		

## Part B

### REPRESENTATION

**To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?**

Paragraph:

Policy: None of the above

Policies Map: Yes

Site Reference: EPP.R5

Settlement: Epping

**Do you consider this part of the Pre Submission Local Plan to be:**

Legally compliant: No

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared, Effective, Justified, Consistent with national policy

Complies with the duty to co-operate? No

**Please give details either of why you consider the Submission Version of the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.**

Epping Sports Centre

Proposal to demolish and replace with 43 homes without giving any proper proposal for a replacement Sports Centre is unsound.

Along with loss of the Library and Registry Office, Epping Hall, Magistrate's Court, Police Station and Post Office, and the fact that Epping's secondary and primary schools have been relocated to the town's borders, this further degrades the town's fabric, leaving practically no civic/community facilities in the town. This would be civic vandalism, and contrary to national policy.

Employmentwise, the Sports Centre is one of the town's important employers, particularly for younger employees. It employs about 40 local people. Sports Centre visitors also make use of High Street retailers, and so its closure would adversely impact on these. There are simply no plans by EFDC to replace these lost jobs.

Healthwise, both physically and mentally, the Sports Centre is very important, and used by hundreds of Epping Town residents of all ages, from toddlers to 90+, including many groups, schools and GP referrals. It is within easy walking distance of the vast majority of Epping Town's residents; a big plus. It is relied upon particularly by Epping's older residents, who find its location ideal, and who have no desire to travel further, particularly by car. Its closure would adversely impact on peoples' regular physical exercise, and therefore adversely affect their health. It is also an important social hub for Epping, and so a positive for citizens' mental health, an antidote to the curse of loneliness. Its closure is not sound, would be unsustainable and contrary to national policy, particularly re. improving peoples' health and wellbeing via easy and ready local access to such facilities.

EFDC say a replacement sports facility would be built, but have no further information, such as on its siting, specification or budget. This is unsound. There being no suitable sites within Epping Town, EFDC's representatives are suggesting a site out of town in Green Belt land. There are no proposals on public access to such a remote location. This is inconsistent with national policy. Such a location would be almost entirely dependent on car travel, and so would be more difficult for many to access. It would adversely impact on Epping Town's civic and social life. It would increase road traffic, congestion and air pollution. It would adversely affect the health of those most in need of such facilities. This is not sustainable, and is contrary to national policy.

The EFDC proposal is not positively prepared, lacking as it does in so many important areas. The Sports Centre has relatively recently contracted a new management company, and is currently being upgraded at great cost. The EFDC reports appear to ignore this.

Community involvement in EFDC's proposals has been very poor to non-existent,

particularly in respect of any out-of-town facility. Nobody has sought the views of the users. Publicity for the EFDC proposals has been poor. Many regular Sports Centre users still have very scant or no knowledge of the proposals.

The links to the Arup Infrastructure Delivery Plans on the EFDC website only open up the old and redundant reports dated 30 September 2016. So it's not easy to find the final relevant reports dated December 2017. These important documents, and others such as Appendices B, C, E and F, are also absent from Epping Library and other public places.

In conclusion, the UK is relatively poorly served by sports facilities compared to other countries, and the closure of the town's Sports Centre would be in total contradiction of the national desire to make such facilities easily available locally in order to halt and reverse obesity and the decline in the nation's physical and mental health. Nothing is more important than citizens' health.

**Please set out what change(s) you consider necessary to make the Pre Submission Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

do not demolish

**If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

Yes, I wish to participate at the oral part of the oral examination

**If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

explain details

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GP Surgeries

The EDFC Local Plan has no truly meaningful information about infrastructure such as GP Surgeries. Such information is contained in the Arup Infrastructure Delivery Plans. But it is difficult to rely on the veracity of the data in these documents. For instance, in the Arup document Part A page 57, Arup's Figure 22 table states that Epping Limes Medical Centre has 4,687 patients. This appears nonsensical. Arup's previous Final Draft dated 30 September 2016 reported 6,675 patients. So have 1,988 (30%) patients left or died? The fact is that Epping Limes is the main GP surgery and has smaller branch surgeries at Theydon Bois, North Weald and Waltham Abbey. The latest Arup Plan simply takes a total of 18,748 patients and allocates an equal number to each of the 4 surgeries. This cannot be correct. The main Epping Limes surgery is the busiest surgery and has easily the most patients and staff. It has far more patients than Arup report. It possibly services around 50% of the total number of patients in the 4 surgeries, as any patient would likely attest, considering appointment waiting times often many weeks wait. So perversely the Arup Plan concludes that Epping Limes surgery has spare capacity! The reverse is the case.

One assumes that professionals such as Arup would act objectively, but in compiling the EDFC Plan I wonder whether that is the case. The Arup cover sheet has a disclaimer: "This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party". This makes it practically impossible to effectively query, and so the public are put at a disadvantage in understanding, analysing and critiquing the data and conclusions. But Arup's Lime Surgery data makes one suspicious of the reliability all other data.

The large Kingswood Park and Arboretum housing projects have already increased Epping's population by thousands, but with no matching healthcare provision. The additional 4,000 to 5,000 citizens now proposed clearly requires even more appropriate additional health facilities, but I consider the EDFC Plans fail to properly address this issue. That is not sound, is not positively prepared or justified, and is likely to mean continued degradation to Epping's healthcare. Being so poorly considered, one also questions the effectiveness of the Plans.

Community involvement in EDFC's proposals has been very poor to non-existent. Publicity for the EDFC proposals has been poor. I am not aware of any patient surveys re. GP surgeries. The links to the Arup Infrastructure Delivery Plans on the EDFC website only open up the old and redundant reports dated 30 September 2016. So it's not easy to find

the final relevant reports dated December 2017. These important documents, and others such as Appendices B, C, E and F, are also absent from Epping Library and other public places.

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Investigate more

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explain more

**Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination**

Yes

Signature: Roger driscoll Date: 29/01/2018