

Part B – If necessary please complete a separate Part B form for each representation

**4. To which part of the Submission Version of the Local Plan does this representation relate?
(Please specify where appropriate)**

Paragraph Policy Policies Map

Site Reference Settlement

**5. Do you consider this part of the Submission Version of the Local Plan:
*Please refer to the Guidance notes for an explanation of terms**

- a) Is Legally compliant Yes No
- b) Sound Yes No

If no, then which of the soundness test(s) does it fail*

Positively prepared Effective

Justified Consistent with national policy

- c) Complies with the duty to co-operate Yes No

6. Please give details 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. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments

No objection is made to the principle of the Epping Sports Centre site being allocated for residential if an equivalent or better replacement facility is provided in a suitable location prior to the closure of the facility. It would appear from the site specific development requirements set out in appendix 6 that it is the Council's intention that the redevelopment of the site should not take place until a replacement facility is delivered and operational which is welcomed. However, objection is made to the wording of the development requirements set out in appendix 6 as they are not considered to be precise enough to accord with Government policy set in paragraph 74 of the NPPF relating to replacement sports facilities. Without such detail, it is considered that the policy could be subject to misinterpretation when applied in practice. The second criterion of paragraph 74 of the NPPF requires replacement facilities to be "equivalent or better provision in terms of quantity and quality in a suitable location". This is to ensure scenarios do not arise where replacement facilities are proposed which are smaller or poorer quality than the existing facility or are proposed in locations that are inaccessible to existing users. Sport England has regular experience of planning policies relating to replacement sports facility provision being misinterpreted by developers where there is not sufficient clarity on these matters. It is therefore requested that the development requirements be amended accordingly to ensure that the policy is consistent with national policy.

(Continue on a separate sheet if necessary)

7. Please set out what change(s) you consider necessary to make the Submission Version of the 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 Submission Version of 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.

It is requested that the final paragraph of the development requirements for site EPP.R5 Epping Sports Centre (Appendix 6) be amended along the following lines to address this matter:

"Closure of the existing Epping Sports Centre and the re-development of this site should not take place until an equivalent or better (in terms of quantity and quality) replacement sports/leisure facility in a suitable location is delivered and is operational. This is to ensure that the public have uninterrupted access to sports/leisure facilities in the local area.

It is also requested that the development requirements section is amended if appropriate to ensure consistency with the finalised Built Sports Facility Strategy action plan proposal for this site in order to ensure that the site allocation is consistent with the

(Continue on a separate sheet if necessary)

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

No, I do not wish to participate at the hearings

Yes, I wish to participate at the hearings

9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination (Please tick)

Yes No

11. Have you attached any documents with this representation?

Yes No

Signature:

Date:

29-01-2018