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Nick Smithson  
Forward Planning  
Epping Forest District Council  
Civic Offices  
High Street  
Epping CM16 4BZ

10 October 2017

Dear Mr Smithson,

**DRAFT LOCAL PLAN ALLOCATIONS: EPPING SPORTS CLUB AND LAND WEST OF BURY LANE (SR-0132CI)**

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We write on behalf of Lands Improvement Holdings (LIH), who have recently acquired land within Epping Forest adjoining Epping. Part of the landholding, the Epping Sports Club and land west of Bury Lane, is allocated within the Draft Epping Forest Local Plan (SR-0132Ci) and we write to reaffirm our support for the allocation, to provide additional information and to request further consideration of the nature and extent of this allocation.

The following documentation is provided for your consideration:

- Location Plan prepared by Omega
- Red Line Plan prepared by Omega
- Access Opportunities Plan prepared by Omega and TPP
- Landscape and Ecology Opportunities Plan prepared by Omega and Tyler Grange
- Land Use Opportunities Plan prepared by Omega
- Email correspondence from the Chair of Epping Sports Club.

This letter outlines our understanding of the sport and recreation need in Epping. It explores the opportunities and constraints for the identified land parcels, suggests alterations to the draft allocation to allow appropriate response to local circumstances, meet any unmet needs in the locality and provide sufficient flexibility to deliver a signature new piece of sporting infrastructure for the town of the highest quality, layout and design.

**a. Epping Open Space, Sports and Recreation Need**

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The Epping Corporate Plan 2015-2020 states that more and better cultural, community and recreation facilities are required in Epping. This is supported by the Epping Leisure and Cultural Strategy 2014, which aims to increase the number and frequency of people participating in leisure, cultural and community activities, by ensuring that local provision is accessible and of the highest affordable quality.

The Epping Forest Open Space, Sport and Recreation Assessment 2012 assessed the need in the District up to 2017. This concluded that there was demand for open space, walking, jogging and cycling facilities in Epping, with residents noting dissatisfaction with the quantity and quality of local provision within Epping. This document did not take into consideration the additional population projections identified as part of the Draft Local Plan and is now out of date.

Sports England commented on the Draft Local Plan in late 2016 noting that it was likely that further facilities were required and requested further evidence on sports and recreation provision. They also requested that where there is to be a loss of facilities as a result of development, proposals must be in place for their re provision. In response to these comments, the Council is preparing an Open Space, Playing Pitch and Indoor Sports Study to understand the current level of provision and identify any additional requirements to meet the needs of the current and future population. We understand that this will be released mid October 2017 and we welcome the opportunity to engage and contribute towards the document.

We confirm the intention is to relocate the Epping Sports Club to the west of Bury Lane, as part of a comprehensive development.

The subject site provides the opportunity to improve and expand sports and recreation provision in Epping to meet anticipated demand in the locality in a highly suitable and sustainable location for such infrastructure and we would welcome the opportunity to discuss the outcomes of the Open Space, Playing Pitch and Indoor Sports Study to identify how our site could meet some of that need.

**b. Current Allocation: SR-0132Ci**

The subject site is proposed to be allocated for residential development (approximately 49 homes) under Draft Policy P 1 Epping within the Draft Local Plan, identified as SC-0132Ci as shown in Figure 1 below.

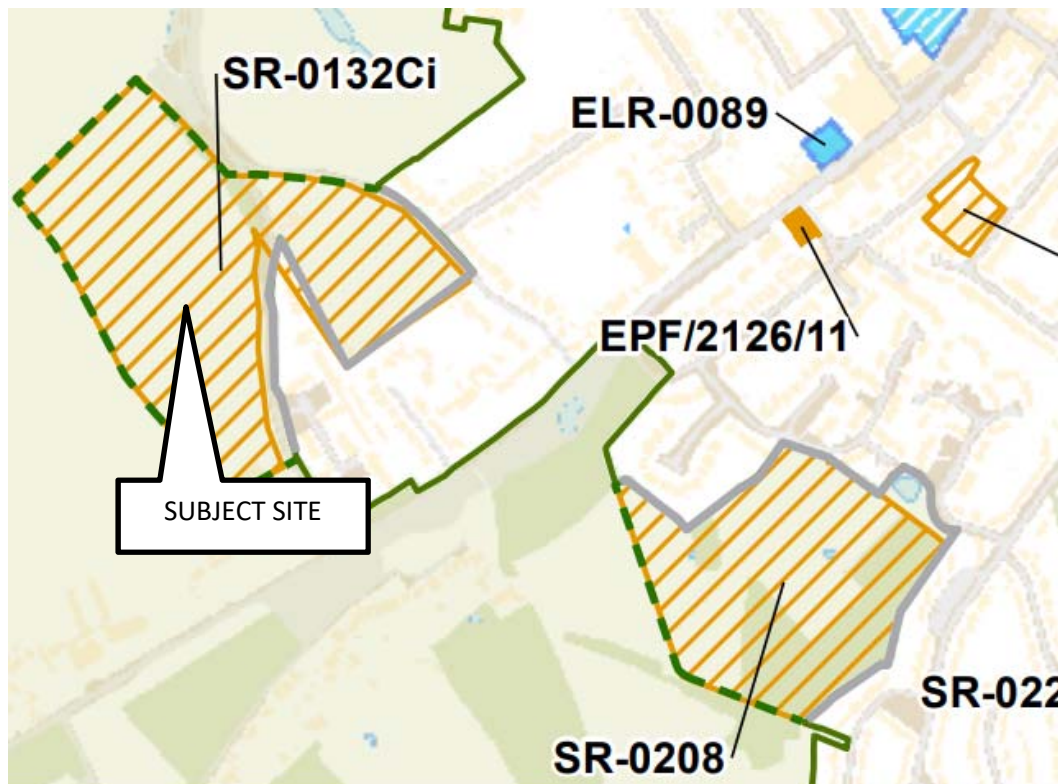


Figure 1: Site Allocation, Draft Local Plan 2016

The Sports Club land amounts to circa 2.2ha. With the provision of the 49 dwellings on the current Sports Club land, this results in a density of 22 dwellings per hectare. We note that Draft Policy SP 2

Place Shaping in the Draft Local Plan suggests that new residential development should achieve densities between 30 and 50 dwellings per hectare, and the current site allocation does not comply with this policy. Accordingly, a policy compliant scheme on the existing Sports Club site should yield somewhere between 66 and 110 homes. It is also noted in the 2012 SLAA that the site could support approximately 70 dwellings.

As the subject site is located on the edge of the largest settlement in the District, we consider that a higher quantum of development could be achieved across the Sports Club to maximise residential density in sustainable locations and minimise greenfield land take elsewhere, in accordance with development principles articulated in Draft Policy SP 2.

We recommend in the next iteration of the local plan, that the allocation be amended to reflect this.

The intention of the new landowner, Lands Improvement, is to relocate the existing sports club and provide improved and expanded sporting facilities for Epping on land to the west of Bury Lane. We therefore, continue to support the adopted approach of a single allocation of the existing Sports Club and land to the west of Bury Lane to allow for a comprehensive redevelopment approach in this locality.

### **c. Wider Site Opportunities and Constraints**

We confirm the intention to relocate the Epping Sports Club to land to the west of Bury Lane and we are currently in early discussions with the Sports Club regarding the relocation of the club.

John Brades, Chairman of the Epping Sports Club, will shortly be providing Lands Improvement a list of requirements for consideration. Correspondence from the Chairman to date, enclosed with this letter confirms that the current facilities are insufficient for modern day purposes and need significant investment to bring them up to standard, and confirms that they wish to expand and grow their membership and therefore need improved facilities to do this.

As such, we have undertaken an initial assessment of the opportunities and constraints of the subject site and wider site and have provide this in plan form for your consideration. Table 1 below outlines the opportunities and constraints identified to date and provides an insight as to the design and feasibility process that we have recently commenced.

Table 1: Site Opportunity and Constraints

<b>Opportunities and Benefits</b>	<b>Constraints and potential mitigation</b>
The provision of additional sports and recreation facilities to meet anticipated demand and expand the type of facilities currently provided in Epping to the benefit of existing and future residents.	TPO trees along western edge of Bury Lane would need to be retained. Vehicle access to land west of Bury Lane would need to utilise existing gaps within the boundary tree cover where practicable.
The ability to provide a definitive Green Belt boundary to the west of Bury Lane and square off Green Belt boundary to create a comprehensive and cohesive settlement boundary to the north west of Epping.	Ecology and wildlife. Further survey work will be undertaken to understand the impact and seek appropriate mitigation measures are provided on the site.
We note that the current Sports Club has limited parking on-site. The relocation would allow adequate parking facilities to be provided on-site.	Bell Common Conservation Area is located to the south of the site. No key views towards the site are identified within the Bell Common Character Appraisal. The retention and enhancement of site boundary planting could serve to maintain screening and therefore appropriate mitigation measures can be provided on-site.

<p>Built form could be positioned close to the existing settlement edge, with the new sports pitches located towards the northern reaches of the site, offering a soft transition to the wider countryside and filtering views into the lower northern reaches of the site. Similar to St. John's School and Epping cemetery.</p>	<p>Views into and around the site. This can be appropriately mitigated through planting and landscaping on site.</p>
<p>Provision of a pedestrian and cycle link from Bury Lane to the cemetery. We understand that this is a community aspiration.</p> <p>This could include a pedestrian and cycle crossing on Bury Lane to create a safe and sustainable link to Epping centre.</p> <p>There is also the opportunity to provide walking and cycling links into the wider footpath network around Swaines Green and extend Centenary Walk. In addition, there is also the opportunity to provide walking and cycling links to Epping Upland and Epping Green to the north.</p>	
<p>Ability to provide additional reinforced planting to support Green Infrastructure links and strengthening containment and habitat connectivity both on site, to the north and to Swaines Green.</p> <p>This would help enhance ecological management and habitat corridors in the locality, which could be separate from pedestrians.</p>	
<p>Provide strategic boundary planting to the perimeter of the existing sports ground to ensure the redevelopment is sensitive to the amenity of surrounding residential occupiers.</p>	
<p>Opportunity to safeguard land for potential future cemetery expansion.</p>	

#### **d. Proposed Amendments to Draft Allocation**

We note that the Sports Club amounts to 2.2ha in total and that Draft Policy SP 2 Place Shaping in the Draft Local Plan suggests that new residential development should achieve densities between 30 and 50 dwellings per hectare. The current site allocation for 49 dwellings results in 22 dwellings per hectare, which therefore does not comply with draft policy. Accordingly, a policy compliant scheme on the existing Sports Club site should yield somewhere between 66 and 110 homes.

Further detailed work is required to understand the opportunities and constraints of the subject site and wider site to ensure that the appropriate facilities for the Sports Clubs and residents of Epping are placed in the most suitable and sustainable location west of Bury Lane. For example, the topography west of Bury Lane needs to be analysed as sports pitches require flat land and the most suitable location needs to be identified to ensure minimal earthworks are required.

Delivery of the sports pitches will also need careful consideration in terms of timing associated with the delivery of housing on the existing Sports Club site. Due to the lead in time associated with creating pitches, which can be up to three years, early delivery of housing within the Local Plan housing trajectory will allow these pitches to come forward at the earliest possible opportunity for residents.

We recommend in the next iteration of the local plan, that the allocation wording be amended to reflect the following:

- Amended dwelling yield for the sports club site to reflect Draft Policy SP 2.
- Flexible wording regarding the re location of the Epping Sports Club to allow the subject site to support improved recreation provision, subject to an appropriate agreement being reached with the Sports Club and viability of this provision.
- Increase to the red line of the allocation to allow for opportunities and benefits identified above to be realised and to respond to the Council's updated evidence base.
- The housing trajectory anticipates housing being delivered within the first five years of the Plan period to ensure facilities are provided at the earliest possible opportunity for residents.

#### **e. Conclusions**

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As identified above, Lands Improvement consider that there are significant opportunities to support the development of the Epping Sports Club and land to the west of Bury Lane and confirm their support for the allocation within the Draft Local Plan for the two parcels of land within one allocation. We note that whilst there are constraints, which need to be explored further at planning application stage, these can be overcome with good design and additional supporting information so that a signature new piece of sporting and recreational infrastructure can be delivered for the town.

We also consider that the site can support an increased dwelling capacity, in accordance with Draft Policy SP 2 and that the ability to maximise residential development in this location will enable greater investment to be levered into new sporting facilities for the town.

We would be happy to meet with you to discuss the site and proposals moving forward, if required. In the meantime, please do not hesitate to contact myself or Viktoria Oakley from Lands Improvement should you have any queries regarding this matter.

Yours sincerely,

.....Redacted.....



Katie Inglis  
SENIOR PLANNER

Encl.

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cc. Derek MacNabb