

Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

Stakeholder ID	3380	Name	Simon & Sarah Fulbrook
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Date	19/1/2017
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Letter or Email Response:

Dear Sirs, Epping Forest District Draft Local Plan (the "Local Plan") We write in connection with the Local Plan in order to: detail our observations on the local Plan's impact on Epping; and object to the removal of Epping Sports Club and land to the west of Bury Lane (Site: SR-0132Ci) from the Green Belt and its allocation for residential development as proposed in Policy P1 of the Local Plan. We comment in detail on these matters in the two Appendices to this letter (Appendix (A) at pages 2-4 and Appendix (B) at pages 5-18). Please do let us know if you would like to discuss any of the above or require clarification on any of the sources or citations used. Yours faithfully, Simon Fulbrook Sarah Fulbrook

APPENDIX (A) LOCAL PLAN OBSERVATIONS SUMMARY Epping is a fabulous market town with a rich history, a relatively diversified town centre and good transport links by road and Tube. There is no doubt that Epping is a popular destination for people to move from Greater London and also a popular place to visit for its high street, recreational opportunities (in particular Epping Forest) and restaurants/nightlife. We also acknowledge the general housing shortage in the South East of England and the need for new housing in Epping Forest District ("EFD") - and Epping as part of that We fully support a well thought out and co-ordinated local plan whose remit extends to improving the area and its environs for the existing inhabitants and visitors as well as for new dwellings. A local plan is an opportunity to create a detailed aspirational vision of an area which provides for the needs of its current and future residents and visitors. This should be comprehensive in all areas - addressing (hand in glove) the infrastructure, travel management, education, medical, retail, civic, religious and recreational/sporting needs of the area and seek to preserve its character and charm. We consider that the draft Local Plan falls far short of this and focuses solely on new sites for development. There is the potential that Epping, in particular, through the implementation of the Local Plan could lose the very charm and character which residents hold dear as that would defeat the purpose of expanding the population of the town - unless the intention is purely to render the town as an unattractive dormitory commuter town for London without heritage, culture, vibrancy and history. You have time to remedy this. It is in this vein that we observe that the Local Plan currently provides for Epping to bear a disproportionate: population increase (c.33% in Epping) vs other areas in EFD (c.19% for the rest of EFD); and (b) number of new dwellings (c.14% of the total for the whole of EFD in the Local Plan where its number of dwellings only accounts for c.9% in the entire EFD currently). This is a 14% disparity in population increase, which is unacceptable. This additional burden placed on Epping is excessive and there is no reason offered for this disparity in the Local Plan (and we cannot envisage there being a justifiable one). Neither the Local Plan or accompanying materials offer a coherent traffic management plan for Epping or proper plan on retaining local service provision (i.e. education, medical, nursery) or takes account of future plans already beyond initial gestation (for example, there is no mention of the proposed St. John's Road retail/commercial development which would revolutionise the centre for residents and visitors during the day and at

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night) and this is at odds with the purpose and ambitions of a local plan. The Infrastructure Delivery Plan sets out some idealised goals, but without the detail we are likely to end up with a patchwork of permissions which may well not be correctly stitched together. The Local Plan should be that overarching binding reference point and no development should commence based on the Local Plan until all of the other infrastructure, sporting, educational and other needs and costs have been detailed and approved. That way we can ensure they will be delivered and EFD residents will not have to pay for them. The proposed allocation of sites within Epping has been done in a piecemeal fashion. A piecemeal approach to releasing sites around Epping may seem easier and more attractive, but once sections of the Green Belt are removed, the integrity is reduced and so its benefits begin to be lost. We consider that focus of the Local Plan should be concentrated on a garden village (or a large site incorporating the majority of Epping's development) attached to Epping which would lessen the impact on Epping and the Green Belt. That way, proper access arrangements, traffic management, school, medical, recreational/sporting and services/facilities can be incorporated and designed in order to enhance the town as a place to live and preserve its character and attraction. We give some site suggestions below.

DISPROPORTIONATE BURDEN Epping is assuming a disproportionate number of dwellings in the planned allocation detailed in the Local Plan. The Local Plan states that EFD should absorb an increase of "11,400 new homes". The 2011 census, produced by the Office for National Statistics ("ONS"), concluded that each dwelling in the UK contains an average of 2.3 people. A conversion of the "11,400 new homes" proposed in the Local Plan, using that multiplier, in order to determine a population increase figure results in a population increase in EFD of 26,220 by 2033. EFD has a base population of 124,700 (ONS mid-year estimates 2010)¹. The addition of 26,220 people in EFD would result in a 21% increase in population against that base and an aggregate total of 147,300 residents by 2033. The ONS forecasts EFD to have a 10.7% population increase in the period from 2014 to 2042². Compounding that growth through to 2033 gives a population of 145,240, which ties in with the calculation based on the number of new proposed dwellings (although it assumes full occupancy of all dwellings in the area now and then). Accordingly, the population projection for EFD in the Local Plan broadly tallies with the ONS projections -which is logical. Epping itself had 11,461 residents in 2011 (this was taken from the same census used to obtain the figure of 124,700). The absorption of 1,640 new homes³, with an average occupancy of 2.3, will result in an additional 3,772 residents in Epping. This is a forecast population increase of c.33% in Epping by 2033 against the base reference number., 33% is a disproportionate increase for Epping when EFD's population as a whole is only forecast to increase by 21%. The disparity is made all the more stark when recalculating the increase in EFD and not including Epping itself (i.e. on a weighted basis), which results in Epping assuming a c.33% population increase and the rest of EFD a c.19% increase. This is a 14% differential - which is 75% greater than the rest of EFD. This should be rectified in the Local Plan and appropriate adjustments made to equalise the burden of new dwellings across EFD. On an adjusted basis, Epping should be apportioned 1,050 new dwellings in the Local Plan instead of 1,640. As the number of new dwellings proposed for Epping in the Local Plan was ascertained prior to the construction of the 150 dwellings forming part of the Arboretum development, then this figure should be further reduced to 900. Finally, it is noted that a number of the infrastructure considerations (for example in the Epping Forest Open Space, Sport and Recreation Assessment from June 2012) use different and smaller population growth forecasts for EFD than the 26,220 number and therefore these surveys and data should be recalculated using accurate population increase data to ensure that there is no infrastructure shortfall and correct levels of traffic, transport and utility demands are captured.

INFRASTRUCTURE/SERVICES The Local Plan is a 15 year plan which will impact Epping and its surrounds for a long time and there should be careful consideration of the needs of the town as a whole (schools, medical facilities, roads, utilities etc.) by the end of the Local Plan and not just revolve around new dwellings. The proposal to build on the Epping hospital site and relocate medical services to Harlow is ill thought out and potentially dangerous. The facilities in their current location specifically allow for easy and local access to medical supervision and testing services in Epping for the elderly, mothers for ante-natal and post-natal care/supervision and young children/babies. The relocation of these services to Harlow will not only inconvenience those users greatly (many of whom may not drive through age or incapacity or for medical reasons), but mean that some may not use those services unless they think it absolutely necessary (which may lead to early warning signs being missed). With the demographic projection for Epping in the Local

1Data

taken from ONS website, Paragraph 2.3 of the Local Plan and the Epping Forest Open Space, Sport and Recreation Assessment from June 2012 (cited in the Local Plan) 2 2014 - based Subnational Population Projections, ONS 3 i.e. as proposed in the Local Plan for Epping solely

Plan showing a greater number of elderly people and young mothers/families, then it seems counter- intuitive to remove this provision from convenient access at the same time as

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forecasting its relevance. There is no detailed consideration within the Local Plan of the civic, community, recreational, educational, retail or heritage needs and demands of the town (for example, the St John's Road development should be included). These concerns, along with related infrastructure and traffic management and community requirements, should be considered as one with development sites (not as an afterthought based on a short form generic infrastructure plan) so that the future enjoyment of the town by its existing residents can be ensured. There is too much focus on new dwellings for new residents and not enough consideration of existing residents and ways to shape and improve their town whilst preserving its character and appeal for the new residents who will move into the area when the town expands. We note as well the proposal to supply more car parking spaces to the town whilst also opening up the land for further dwellings. If practicably possible to deliver then we are supportive of this. However, we do have a couple of concerns in this regard: where will commuter traffic park given the loss of the railway car park? It is long understood that Harlow and Ongar residents drive to Epping in order to use the more cost effective and frequent Central Line service, but they will be forced to park in other areas of the town which will increase congestion; and (b) whilst the car parks are being developed for Epping town centre, where will the parking be situated so that the High Street does not diminish? TRANSPORT 1 Traffic in Epping is frequently at a standstill (see Google Traffic snapshots below in paragraph (8)5.7). This does not serve residents, visitors or those commuting to and from Greater London by road and increases pollution, noise and significant delay in the town. Insufficient thought has been given to traffic management and reducing congestion in the Local Plan. Whilst the Local Plan quite rightly focuses on additional housing, we are not going to attract local people to the area to live or visit or use Epping for shopping, leisure, recreational or sporting pursuits or restaurants/nightlife if their journey is unpleasant or difficult. Further detailed assessment needs to be made about this and the relevant costs each developer should bear when obtaining rights to develop certain plots. This should be undertaken on an assessment based on accurate population forecasts (see paragraph (A)2.6 above) and completed way in advance of planning consideration to ensure that Epping receives what it actually needs and the developers (not EFDC) pay for that provision. If this results in developers considering sites to be unprofitable, then so be it. The town's growth and development should not be based on profit margins for developers, but instead on stipulation, suitability and sustainability. This accords with national planning policy and common sense. The Infrastructure Delivery Plan (dated 30 September 2016) states very clearly that discussions with Essex County Council have highlighted that the road through the centre of Epping (B1393) currently experiences significant congestion problems - particularly around the Ivy Chimneys/Bell Common traffic lights and Wake Arms roundabout. It lists only six traffic sites in the whole of EFD which are "operating noticeably above capacity". Three of these are within 1.4 miles of each other and effectively cover the entirety of Epping - gridlocking its roads. It is a linear settlement and linear settlements will always have traffic management issues - but the Local Plan is a great opportunity to find an effective solution which preserves the character of the town (including through gridlock and pollution) and ensures people have good access in and to its facilities. One of the key attractions for residents in Epping who work in central London is direct access to the City and beyond on the Tube. The Tube is already very busy in the mornings and evenings (seats during the morning rush hour can all be taken by Theydon Bois and not available at all during peak times on the return leg home). Whilst it is noted that TFL have stated that the trains need to be more occupied before they consider increasing capacity, any growth in population will impact not only on residents of Epping, but also have a knock-on impact down the line where people who are reliant on the Tube before it joins with the Hainault loop (notably Woodford, South Woodford and Snaresbrook) often have to wait before a train with standing capacity becomes available. This issue will become more acute as a result not only of the increased population in Epping and EFD, but also the target demographic for that increase who are more likely to use the Tube during peak hours. We note that a high level commentary has been produced regarding traffic arrangements/management in the Infrastructure Delivery Plan which accompanied the Local Plan, but given the transformational change being proposed for Epping. We would have expected to see a more detailed consideration of Epping's transport requirements with proposed solutions to the current issues (e.g. the western orbital bypass Essex County Council have considered to relieve the three pressure points highlighted as "operating noticeably above capacity" in Epping) as that will inform and engage the decisions on locations for housing and facilities. ALTERNATIVE SITES We would suggest the following sites: land currently abutting the M25 given it is hemmed in by the motorway and of a suitable size (provided new road infrastructure is constructed and additional provision for primary school education is built so as not to create an undue burden on Ivy Chimneys). It is proximate to the Tube and also already visually impaired by the presence of the M25; and land around North Weald airfield. Access arrangements to the Tube could be built (potentially using the existing rail infrastructure close to the site). Furthermore, the site is already

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brownfield and so will not result in a loss of Green Belt land. APPENDIX (B)

THE PROPOSED SITE SR-0132CI EPPING SPORTS CLUB AND LAND TO THE WEST OF BURY LANE (THE "SITE") OVERVIEW OF OBJECTIONS Our objections to any development on the Site can be summarised as follows: the Site is unsuitable for development and been inappropriately selected. Policy P1 should be amended to delete the Site from its list of residential allocation (see paragraph 2 (Inappropriate Selection) below for our reasoning); the Site clearly merits continued allocation as Green Belt (and Figure 3.8 of the Local Plan should be amended accordingly) (see paragraph 3 (Green Belt) below for our reasoning); notwithstanding its continuing merit as Green Belt, Epping Sports Club is a longstanding asset to the residents of Epping and, specifically, the residents in the west of Epping and should at the very least be protected and preserved by EFDC through an allocation as District Open Land (see paragraph 4 (District Open Land) below for our reasoning); residential development on the Site would lead to unacceptable traffic problems on Lower Bury Lane & Bury Road (especially given the burden these roads have already suffered as a result of the new St John's school through increased vehicular and pedestrian traffic movements associated with the school) and Bury Lane (a narrow road with no pavements for much of its length which has natural barriers to pedestrian/cycle access to the proposed site of the relocated sports facilities) (see paragraph 5 (Traffic) below for our reasoning); the recreational and sporting facilities and open green space of the Site are an historic asset of the town (helping typify its character and heritage) and should not be removed (see paragraph 6 (Heritage) below for our reasoning); (f) the intended growth of population of Epping in excess of 33% of the 2011 census and EFDC's own recent sports and recreational facility assessment requires more sports facilities and not fewer and so the sporting facilities at the Epping Sports Club should not be lost (see paragraph 7 (Loss of recreational/sporting facilities) below for our reasoning); it is nonsensical to relocate sporting facilities approximately 100 metres west of the current site of the Epping Sports Club in order to try to obviate Green Belt rules and build on the Epping Sports Ground and this would have an adverse environmental impact without benefit (other than to the landowner and developer) (see paragraph 8 (Environmental) below for our reasoning); and this small area west of Epping has already recently adopted significant residential development in the form of the additional c.150 dwellings as part of the Arboretum and the new St John's School and it is overbearing to allot more of such development in this area so soon after completion of the last round (see paragraph 9 (Undue Burden) below for our reasoning). We set out these objections below in more detail together with evidence supporting them. Paragraph 10 (Required actions from EFDC) details the actions we require EFDC to take before the pre-submission publication scheduled for June/July 2017.

INAPPROPRIATE SELECTION We were advised at the interaction meeting with the Planning Team at Epping Town Hall on Friday, 11 November 2016 that the first round sites in Epping were initially identified on the basis of willing sellers/developers who have put forward their sites for development over a period of time and no effort was made by EFDC to identify suitable sites on their own (which has been confirmed in the accompanying materials to the Local Plan). We were then further advised that these sites have been objectively filtered with the site specific surveys prepared by Arup to select the current proposed sites (we comment below on that process). The National Planning Policy Framework (the "NPPF") stipulates that local plans "should meet objectively assessed needs, ... and be genuinely plan led and setting out a clear strategy for allocating sufficient land which is suitable for development in their area". The initial method of selection (i.e. being developer/seller led) is clearly at odds with the Government framework as sites have only come up for consideration where first offered (which means that other good sites would have been disregarded even if valid where no landowner offer was made). Instead, it should have been for EFDC to engage professionals to make a recommendation about suitable sites and then for discussions with landowners to follow. If landowners are unwilling to sell then compulsory repossession (funded by tendered developers) can occur. There was not an issue with doing this for the Olympic Site - something which has improved that area - because it fitted within the plan for the overall scheme and it was considered transformational to the area. The same approach should have been taken here given the transformational proposed increase in population in Epping of c.33%. Finally, no scores have been given for the Site Selection Reports prepared by Arup to any particular sites (or any methodology for weighting - for example, is Green Belt more relevant than access or archaeological impact more relevant than landscape sensitivity?) and no further second, and more thorough, sifting or review process was undertaken. Clearly a subjective assessment has been made on the site selection scores put forward and the reluctance to provide that information (either online or when asked directly at consultation meetings with planners) is perhaps indicative of decisions not having been made on a reasonable and objective basis. We contend that this is perhaps the case with the Site given: both parcels of the Site have been considered to make a significant contribution towards Green Belt purposes and paragraph 2.1 in the Site Suitability Assessment is therefore incorrect; the traffic impact on Lower Bury Lane, Bury Road & Bury Lane is rated as

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uncongested at peak times, but clearly that is not the case (see below in paragraph (8)5); the limited access points to the Site and the access points to those access points (i.e. from the 81393 via Lower Bury Lane and Bury Lane) are not considered to be problematic in the Site Suitability Assessment but again this is clearly not the case (see below in paragraph (B)5);

1Paragraph 14 of the NPPF 2 Paragraph 17 of the NPPF 3 Paragraph 17 of the NPPF (d) the Site Suitability Assessment contends that the development of the Site will improve access to open space, whereas it will actually remove it from local residents (again see below in paragraph (8)5); and (e) the Site Suitability Assessment does not give adequate weight to the adverse impact on the character of the area in 5.2 of the Site Suitability Assessment. GREEN BELT Both sides of the Site are currently Green Belt land and interconnected with the wider Green Belt surrounding Epping. Whilst there is currently development on two sides of the Epping Sports Ground, it flows into the rest of the Green Belt through the open land to the west of Bury Lane and through the Green Belt designated site on which the school is developed (and which was expressly retained as Green Belt land when consent for planning on the school site was given as evidenced by the planning permission for the school and the applicable EFDC meeting minutes). The NPPF is very clear on Green Belt land: •The Government attaches great importance to Green Belts"• (b) "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open: the essential characteristics of Green Belts are their openness and their permanence. "5 •Once established, Green Belt boundaries should only be altered in exceptional circumstances.115 •As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. "7 "When considering any planning application. local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances ' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations."8 We do not consider in respect of this Site that there are 'very special circumstances' for its development and the loss of it as Green Belt land (as was evidenced for the construction of the new school on Green Belt land where very special circumstances did apply) - certainly not when you take in account the other considerations in respect of the Site which we set out in this letter. DISTRICT OPEN LAND . In addition to the sporting facilities, local residents use the Site (and have used the Site for as long as residents can remember) as common land - to walk dogs, play with children etc. Several houses have direct gate access onto the open green space from their gardens and have done at least for several decades. This land is valuable open public access space in the west of Epping (there is no other similar land located on this side of the town) and it should be preserved and protected by EFDC instead of being lost to development.

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Paragraph 79 of the NPPF 5 Paragraph 79 of the NPPF 1Paragraph 83 of the NPPF 1 Paragraph 87 of the NPPF • Paragraph 88 of the NPPF Notwithstanding (and without limitation, or prejudice, to) the arguments relating to Green Belt, the Epping Sports Club site should be allocated as District Open Land in accordance with Polley SPS and protected from future development. We consider this an applicable designation because: the space is in close proximity to the community it serves (i.e. the residents of the western side of Epping); the Site is a green area which is demonstrably special to the local community and holds a particular local significance because of its beauty, historic significance (it has been used as a site for sport and recreational pursuit by members of sporting clubs and residents for 120 years), recreational value and tranquillity; and the Site is local in character and is not an extensive tract of land. This designation is consistent with Government policy/guidance: "[O]pen space and sports and recreational facilities that are of...particular value to a local community, should be recognised and given protection by local authorities through appropriate policies in plans. Areas of particular quality may include[i.] small areas of open space in urban areas that provide an important local amenity and offer recreational and play opportunities;"9 "Local authorities should: avoid any erosion of recreational function and maintain or enhance the character of open spaces; (ii) ensure that open spaces do not suffer from increased overlooking, traffic flows or other encroachment;"10 We consider that the land satisfies all of the criteria to be District Open Land. If not credited with being part of the Green Belt (something which, as we outline above, we would consider to be inconsistent with the criteria for Green Belt), then the Epping Sports Ground fulfils these other criteria and accordingly should be preserved and maintained without development. TRAFFIC The Site Suitability Report for the Site states in respect of traffic that: "Area around the site expected to be uncongested at peak time, or site below the site size threshold where it would be expected to affect congestion." 9 Paragraph 11of the Planning Policy Guidance 17 - Planning for open space,sport and recreation 10 Paragraph 17 of PPG 17 This is patently not the case for Lower Bury Lane and Bury Road. Both suffer increased vehicular and pedestrian traffic from St. John's School at peak times. A number of residents in Lower Bury Lane elect

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to delay their return to their properties around the time of school opening/closing as they are unable to get home due to the numbers of children walking in the road and the cars parked along the double yellow lines as well as over dropped kerb entrances to houses. Further, the roads around Lower Bury Lane and Bury Road contain 70 dwellings. The proposed additional 49 dwellings would increase the number of dwellings by 70% and if the 65 sites proposed by the promoter were developed that would almost double the number of dwellings being served by these two roads. The roads are already too busy with the existing 70 dwellings and the traffic from the school before such large increases are factored in. Lower Bury Lane itself is not very wide (especially since the introduction of pavements for the increased number of pedestrians walking to the school) and easily becomes blocked. Furthermore, the school children walk in the whole of the road (rather than on the narrow pavements) due to their number at peak times. We set out below some photographic illustrations of this (taken at different times of the day and on different days): Junction of Lower Bury Lane/Bury Road (taken at 8:23am on 2 November 2016) Lower Bury Lane (after the junction above towards the school and taken at 3:10pm on 4 November 2016) Bury Road towards Epping Sports Ground (taken at 2:55pm on 4 November 2016) Bury Road outside 3 Bury Road down to end of the road (taken at 2:55pm on 4 November 2016) Furthermore, traffic backs up along Lower Bury Lane trying to get out onto the 81393 (High Road). This adds to further congestion in Lower Bury Lane and Bury Road. Adding vehicular traffic for another 49 homes and pedestrians going to new sporting facilities (both of which are likely - given the target demographics set out in the Local Plan - to include residents and users who will be using the road during peak times for school opening/closing and to travel to work) is not only going to clog Lower Bury Lane and Bury Road completely, but also increase the chances of accidents occurring. Furthermore, the access points for both the Epping Sports Ground and the land to the west of Lower Bury Lane are close to existing road junctions and poorly sited. They will increase traffic congestion and the risk of accidents. The below photo shows the unsighted access point and narrow road for the entry on Lower Bury Lane (which is currently acceptable because traffic to the cricket club generally falls outside of peak times): Junction of Lower Bury Lane & Bury Road looking up Lower Bury Lane away from school (taken at 2:55pm on 4 November 2016) Finally, this traffic has to go somewhere and invariably the majority of it will flow through Epping or south towards London and other parts of Epping Forest district. The Infrastructure Delivery Plan dated 30 September 2016 accompanying the Local Plan states very clearly that discussions with Essex County Council have highlighted in particular that the road through the centre of Epping (81393) currently experiences "significant congestion problems", particularly around Ivy Chimneys/Bell Common traffic lights and Wake Arms roundabout Six sites out of the whole of EFDC are noted in this plan as "operating noticeably above capacity". Of these six, four of them concern the 81393 and three of them are within 1.4 miles of each other in Epping- directly the points at which traffic will flow from the Site. Furthermore, the planning inquiry for the St John's School development by Essex County Council in 2005 noted the Bury Lane/81393 roundabout to be "above desirable capacity". This was 10 years ago and traffic congestion has only got worse since then (as the below photos attest):

Looking South West along the B1393 from Lower Bury Lane Junction (taken at 8:32am on 22 November 2016)

Looking North East along the B1393 from Lower Bury Lane Junction (taken at 8:32am on 22 November 2016) This is further borne out by the amount of red on the following Google Traffic illustrations showing the level of severe congestion (taken at different times of the day and on different days - exact dates and times and further examples can be provided): HERITAGE "Once lost heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification 11 The Epping Sports Club site has been used as a site for sporting and recreational enjoyment by the inhabitants of Epping and by local residents for in excess of 120 years. The EFDC local plan speaks a lot of "heritage" (the importance of heritage is noted in excess of 75 times in the Local Plan) and yet the removal of the cricket club from the Lower Bury Lane sports ground after 120 years is not in keeping with protecting and preserving Epping's heritage.

The cricket club recently celebrated its 150th anniversary and is considered to be a club which enjoys a rich history¹²• Cricket matches were first reported to have been played in Epping in 1768 and thrived during the Victorian period¹³• The "who's who" of Epping during that period were involved with the club and the Epping Sports Ground - principally the Cable family and the Rev Buckmaster. The Rev Buckmaster was closely connected with the funding and building of Epping St. John's Church (a Grade II listed building) and that philanthropy and drive extended to obtaining land from the Copped Hall Estate for the purpose of establishing a ground and pavilion for Epping Cricket Club.

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That was in 1896.

11 English Heritage stated principles

12 <http://www.essexcentralmagazine.co.uk/features/club-focus/epping-cricket-club/>

13 The owners of Winchelsea House around that time and later were connected with the building of the Lord's cricket ground

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120 years later it is proposed to relocate the club about 100 metres to the west and lose all that history and heritage. We cannot see a logical or coherent reason for that to occur other than for pure commercial return (which should be irrelevant when determining local plans).

The Site is an intrinsic part of the fabric and rich history of Epping and it would be a shame to lose it - especially as it plays a key part in the attraction of the town as a place to live, work and visit.

This is especially resonant given the further guidance:

"The Government's policy that the focus for additional housing should be existing towns and cities could make existing open spaces seem attractive as potential development sites. In most instances, however, allowing redevelopment will not be good planning Nor will it be enough simply to ensure that if an existing open space or sport and recreation facility is lost to some other land use, it is replaced in broadly the same area. In the absence of a rigorous local assessment, there can be no guarantee that the replacement land is needed or that its new location will serve the public interest."¹⁴

The proposed relocation will result in a loss of a historic site and any replacement or relocation will have neither the history nor be in a location that serves the public interest (since the vast majority of Epping residents will no longer have close walking/cycling access to it).

LOSS OF RECREATION AND SPORTING FACILITIES

The Epping Forest Open Space, Sport and Recreation Assessment from June 2012 (cited in the Local Plan) states that population growth of 16,500 (i.e. 13.2% increase) in the EFDC area by 2031 will "inflate demand for open space, sport and recreation."¹⁵ Whilst we consider the 11,400 dwellings planned as part of the Local Plan will increase this figure beyond 16,500, it is clear that Epping will have a particularly increased demand for direct and local access to sporting

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facilities (i.e. given its proposed c.33% increase in population). There will be an additional requirements on the provision of cricket and tennis (for junior and middle-aged use) and outdoor bowls (for the elderly) facilities.

There are requirements for EFDC to preserve and protect these facilities:

14 Planning Policy Guidance 17 Planning for open space, sport and recreation

15 Paragraph 1.19(e)

para 3.21 of Local Plan states that: "the Local Plan will be an important document in terms of the protection, enhancement, development and management of the Regional Park and the public enjoyment of its leisure, ecological, heritage, and sporting resources."

lb) the Epping Sports Ground is designated as being in the category of "Secured Community Pitches" (using the Sport England categorisation).¹⁶

(c.) furthermore, local authorities are under an obligation to:

avoid any erosion of recreational function and maintain or enhance the character of open spaces;

ensure that open spaces do not suffer from increased overlooking, traffic flows or other encroachment;

The proposed removal of the Epping Sports Club from its current site to a relocated site does not preserve and protect these facilities and it does not comply with the above requirements. Furthermore, it removes easy access to well-used, well-located and much-loved open green space and sporting/recreational facilities.

In summary, Epping itself will need significantly more sporting facilities and not fewer as a result of the planned population increase. Removing the current provision (even with relocation) will take it away from local residents and divert precious resources away from providing that required provision.

ENVIRONMENT

NPPF sets out three dimensions to sustainable development in paragraph 7: an economic role, a social role and an environmental role. The "environmental role" requires district councils to "contribut[e] to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to....use natural resources prudently, minimise waste and pollution".

We do not consider that re-locating sports and recreational facilities from the current Lower Bury Lane site to the land west of Bury Lane (which is approximately 100 metres in distance) is justifiable within the context of that "environmental role" for the following reasons:

the waste of natural resources;

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(b) the pollution;

the failure to protect and enhance Green Belt land;

the loss of an historic sports and recreation site at Lower Bury Lane;

the noise and disturbance to local residents; and

the disruption to traffic on the 81393 {a road that "currently experiences significant congestion problems, particularly around Ivy Chimneys/Bell Common traffic lights"¹⁷} and the Bury Lane I 81393 roundabout (which was stated in the planning inquiry for the St John's School development by Essex County Council to be "above desirable capacity")¹⁸

UNDUE BURDEN

16 Paragraph 3.14 The Epping Forest Open Space, Sport and Recreation Assessment from June 2012 (cited in the Local Plan)

17 EFDC Infrastructure Delivery Plan (30 September 2016)

18 ECC traffic survey in connection with the development submitted as proof of evidence - copy available if required

The number of new dwellings proposed for Epping in the Local Plan was ascertained prior to the construction of the 150 dwellings forming part of the Arboretum and new St John's School developments.

Quite apart from the unnecessarily heavy burden being placed on Epping (which, in itself should merit a reduction to 1,050 new dwellings rather than 1,640 (in-line with the 21% average increase proposed for EFD)), this area of Epping has already taken its fair share of development burden and the associated disruption through construction and increased traffic - amounting to 9% of the 1,640 total and 14% of the 1,050 number which we think is fair and proportionate for Epping to assume under the Local Plan.

REQUIRED ACTIONS FROM EFDC

Regardless of the points summarised above, further loss of Green Belt in this part of Epping (following construction of the new school), the traffic impact, the loss of sporting facilities, the loss of a recreational area for residents, the waste of resources and pollution which will arise by relocating facilities approximately 100 metres west of the current site of the Epping Sports Club and the loss of a heritage asset to the community - the removal of the only green open area to the west of Epping (a site of recreation and sport within the town for 120 years) would be a demonstrable loss to the character and heritage of Epping and the west of Epping in particular. This does not fit within the stated goals of the Local Plan or the statutory guidance used to frame that Local Plan and therefore we request that EFDC affirm that.

The Site clearly merits continuing to be Green Belt and should continue to remain so. Accordingly, Figure 3.8 of the Local Plan should be amended to reflect this.

Response to the Draft Local Plan Consultation 2016 (Regulation 18)

The Site is unsuitable for development and residential development on the Site would lead to unacceptable traffic problems on Lower Bury Lane, Bury Road and Bury Lane. Accordingly, Policy P1 should be amended to delete Site SR-0132CI from its list of residential allocation.

Notwithstanding its continuing merit as Green Belt, Epping Sports Club is a longstanding asset to the residents of Epping and, specifically, the residents in the west of Epping and should at the very least be protected and preserved by EFDC through an allocation as District Open Land.