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Planning Policy Team
Neighbourhoods Directorate
Epping District Council
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Epping, Essex CM16 4BZ

17 May 2018

SUPPLEMENTED REPRESENTATION: EPPING FOREST DISTRICT LOCAL PLAN SUBMISSION VERSION 2017

We write on behalf of Tele Lands Improvement Limited, to supplement our original representations to the Epping Forest District Local Plan Submission Version, submitted to the Council in January 2018.

Lands Improvement are the owners of the land comprising the Epping Sports Club and Land to the West of Bury Lane. This land was previously allocated for a linked development in the Regulation 18 Version of the Epping Local Plan (SR-0132Ci). This allocation was removed from the Submission Version but the reasoning for this decision to remove the sites from the spatial strategy for Epping was not provided by the Council within the Submission Version, associated technical documents or Cabinet Reports. It is noted that Appendix B of the Site Selection Report (prepared by ARUP) was not completed for the public consultation of the Submission Version in December 2017-January 2018.

Since this time, the Site Selection Report has been finalised and Appendix B1.1 Overview of Assessment of Residential Sites notes that site SR-0132Ci (hence forth referred to as the site) did not pass Stage 4/Stage 6.4 of the Site Selection process for the following reasons:

“This site was proposed for allocation in the Draft Local Plan (2016). However, responses received through the Regulation 18 Draft Local Plan consultation indicated that the site is less preferred by the community. It was considered that other sites in Epping were more preferable in terms of their overall deliverability, noting the timescales for the availability of this site and its more marginal viability. If the alternative sites in Epping were allocated they would cumulatively provide the desired growth in the settlement and better support the Epping Neighbourhood Plan. The site is not proposed for allocation.”

In addition, Appendix B1.6.4 Results of the Capacity and Stage 4/6.4 Deliverability Assessments notes that the site is being actively marketed for development and is expected to be available between 2021 and 2025, as informed by the LPD Survey 2016. In addition, the site/proposal has been assessed as having a marginal viability and/or weaker demand for development on the following basis:

“Based on information provided by the developer, the site viability may be more marginal as a result of the costs associated with relocating the sports facilities. This may be overcome by agreeing a lower affordable housing provision.”

This letter responds to the matters raised within the Site Selection Report (and associated Appendices) with respect to community preference, the deliverability and viability of the site/scheme and the wider impacts/deliverability of allocations within Epping Town Centre with reference to:

- Attachment A – Representation from Epping Sports Club to Site Selection Appendix B Consultation;
- Attachment B – Correspondence from Essex Cricket Board;

- Attachment C – Correspondence from Sports England;
- Attachment D – Correspondence to the Council dated October 2017;
- Attachment E – Site Deliverability Statement;
- Attachment F – Concept Plan prepared by Omega; and
- Attachment G – Proposed Policy Wording.

This letter supplements but does not replace our original submission in January 2018, and these responses should be read in conjunction with one another.

a. Community Preference

Draft Policy P1 of the Draft Epping Local Plan 2016 simply noted that subject site, SR-0132Ci (Epping Sports Club and land west of Bury Lane, Lower Bury Lane), could support approximately 49 homes, with no further explanation regarding the re-provision of the Epping Sports Club to land to the west of Bury Lane as part of the allocation.

Consequently, Lands Improvement contend that the community were not appropriately informed of the proposed development option (ie. relocation of the Epping Sports Club) such that a majority of the objections against the proposed allocation related to the loss of the sports facilities entirely and therefore, that the weight of these objections has been unfairly applied to the Site Selection Report/site selection process.

The Council received 3,387 responses from 3,072 respondents on the Regulation 18 Consultation for the Draft Local Plan in 2016. Of the total submissions received, 86 relate to the subject site (SR-0132Ci). An assessment of these submissions showed that three (3) respondents supported the draft allocation on the basis that the sports facilities were rebuilt. Whilst 83 objected to the allocation, sixty (60) of these objected to the complete loss of the Epping Sports Club questioning where sports facilities for Epping would be located. Clearly, this demonstrates that the majority of respondents were not aware of the proposal to relocate the Epping Sports Club to the Land to the West of Bury Lane, or that this re-provision would provide brand new facilities and enable expansion of the sports clubs currently using the Epping Sports Club. The remaining 23 objections predominantly related to traffic and development in the Green Belt. These 23 objections represent only 0.7% of the submissions received for the Draft Local Plan.

This evidence shows that the loss of sports facilities is less than preferable to residents of Epping, not that the site itself is less preferable for development when compared to other allocations in Epping that are also in the Green Belt, with similar constraints such as access. Therefore, the removal of this allocation is not justified on the basis of community objection.

b. Sports Club Preference

The Epping Sports Club is ageing and there is no room for the necessary growth and expansion of the sports clubs who currently use this facility to enable them to serve the existing and future population of the town. There are inherent problems with the current location of the Epping Sports Club with respect to access and parking, especially as it is located adjacent to the Epping St John's School, and conflicts with the adjoining residential uses (e.g. cricket balls being hit into the adjoining gardens and houses).

Lands Improvement have been liaising closely with the clubs who use the Epping Sports Club who have removed their object and now support the proposed allocation and re-location of the sports clubs to Land to the West of Bury Lane. The Epping Sports Club representations to the Site Selection Appendix B Consultation is held at **Attachment A**. This notes that there is still significant information missing with respect to the justification to remove the allocation and seeks for this information to be

made publicly available. Furthermore, Essex Cricket Board also support the relocation of the sports facilities (refer to **Attachment B**).

Sports England previously objected to the allocation under the Draft Epping Local Plan 2016 on the basis of the loss of sports facilities, again because the site allocation only noted that the site could support approximately 49 homes, with no further explanation regarding the re-provision of the Epping Sports Club to land to the west of Bury Lane as part of the allocation. Lands Improvement has been liaising with Sports England regarding the proposal who have now provided their support in principle for the allocation on the basis that the sports facilities would be relocated to Land West of Bury Lane (refer to **Attachment C and G**).

Removal of this allocation is therefore goes against the wishes of the Epping Sports Club and is a major missed opportunity for Epping to provide a new, improved sports facility that could support the expansion of existing sports clubs in Epping.

c. Availability, Marketability and Viability

As identified above, it appears that the availability, marketability and viability assessment of the proposal/draft allocation within the Site Selection Report (and associated attachments) was taken from the 2016 Landowner Survey and from the previous landowner/site promoter's representations to the Council. In this regard, we note that the previous landowner/site promoter's representation to the Regulation 18 Draft Local Plan in 2016 states the following:

*"Our client supports the allocation of site SR-0132Ci in Policy P1. This will enable the redevelopment of the existing Epping Sports Club site for residential purposes and in turn, the development of new modern sports pitches and facilities for the Club on the opposite side of Bury Lane. This has clear planning and sporting benefits for the town as a whole. However, as the former will be used to fund or cross substitute the latter, it will be necessary to agree a lower or no affordable contribution to ensure that the development of site SR-0132Ci remains viable."*¹

This wording is reflected in Appendix B1.6.4 Results of the Capacity and Stage 4/6.4 Deliverability Assessments of the Site Selection Report, but there is no assessment of the viability by the Council using their own evidence base.

In mid 2017, Lands Improvement acquired the site and therefore did not have the opportunity to participate in the 2016 Land Promotion Survey or provide representations to the 2016 Draft Local Plan. However, in October 2017, we wrote to the Council outlining Lands Improvement's intention to develop the site, including the relocation of the existing sports club (**Attachment D**). It appears that this correspondence has not been taken into account within the site selection process.

Given the change in ownership, it is unreasonable for the 2018 Site Selection Report to rely on the 2016 Land Promotion Survey and previous representations to the 2016 Draft Local Plan to assess the availability and marketability of this site. Lands Improvement intend to progress with the redevelopment of this site, it is available now and is actively being marketed for redevelopment, as evidenced by the correspondence with the Epping Sports Club, Essex Cricket Board and Sports England (refer to **Attachment A, B and C**). Lands Improvement have considered the viability of the proposal and confirm that it is viable. Further evidence of this can be provided, if required. The site is therefore available and viable and should pass the tests of Stage 4/6.4 to enable allocation within the Epping Local Plan.

d. Deliverability

Appendix B1.1 of the Site Selection Report (2018) states that other sites in Epping were more preferable in terms of their overall deliverability and that if alternative sites in Epping were allocated they would cumulatively provide the desired growth in the settlement and better support the Epping Neighbourhood Plan.

¹ Stakeholder ID: 4884, Oliver Spencer (on behalf of ADT Fletcher & The Red Trust)

Subject Site Deliverability

An assessment of the deliverability of the site (**Attachment E**) shows that there are no constraints to the delivery of this site. Furthermore, Appendix B1.6.6 Results of Identifying Sites for Allocation in the Site Selection Report (2018) notes that there are no on-site restrictions or constraints. It is therefore clear that the site is considered to be deliverable, contrary to the justification in Appendix B1.1. A plan showing the potential sport club layout at Land to the West of Bury Lane is provided at **Attachment F**.

Alternative Site Deliverability

As identified in our previous representation to the Submission Version of the Local Plan, the proposed spatial strategy for Epping is heavily predicated on the release of large scale strategic masterplan areas which will have implications on the early delivery of housing in the District and the District's five-year housing land supply. Our assessment showed that from April 2017 to March 2022, the Council can only demonstrate a 3.72 years supply of housing. This clearly demonstrates that cumulatively, the other sites cannot meet the housing needs of the locality in the short term and that additional small sites are required to enable the Council to meet its 5YHLS requirement.

In addition to the above, Allocation EPP.R5 proposes the relocation of the Epping Sports Centre but does not identify where these facilities will be relocated to. We understand that the Council is looking to relocate these facilities to North Weald, leaving Epping without a sports centre that is walking distance from the majority of homes, meaning that in the future residents will have to drive to access sports centres. This facility was considered critical to the recreation requirements of the town centre and beyond, in accordance with the Built Facilities Strategy prepared by 4 Global. Additionally, no social infrastructure was identified within any of the residential allocations within Epping in the Submission Version of the Local Plan. It is noted however that if key town centre facilities such as sports clubs or retail facilities were to be relocated to the South Epping Master Plan area, this would detract from the High Street and would force existing residents to drive to these facilities, resulting in less sustainable travel patterns. Therefore, cumulatively the proposed allocations do not meet the sporting or other social infrastructure needs of the residents of Epping.

Furthermore, as identified in our original reps, the Council hasn't provided any evidence that traffic and air quality won't worsen as a result of their chosen spatial strategy, and the transport evidence and air quality evidence is lacking. Therefore, it is not clear that cumulatively the proposed spatial strategy and site allocations solve the inherent transport and air quality issues in the town and therefore the Council cannot contend that this strategy cumulatively provides the appropriate infrastructure solution for Epping. Our previous reps, outlined an alternative spatial strategy for Epping that would cumulatively deal with the housing and infrastructure requirements of the town centre.

Overall, this demonstrates that the weight given to the other allocations to support housing and infrastructure needs in Epping has been overstated and unfairly weighted against Lands Improvements site and is therefore not justified.

Epping Neighbourhood Plan

As identified in our original representations (January 2018), the approach with respect to the reliance on the Epping Neighbourhood Plan is unlawful and unsound, as it is not appropriate to have a Local Plan led by a Neighbourhood Plan, given the evidence base for a Neighbourhood Plan has not been derived through evidence of environmental performance and sustainable development. Paragraph 184 of the NPPF requires Neighbourhood Plans to be in general conformity with the strategic policies of the Local Plan, not the other way around. The Council's reliance on the Neighbourhood Plan as a justification for its chosen spatial strategy is therefore unlawful as it seeks conformity with a lower order plan that is legally required to be in general conformity with the Local Plan which has significantly higher examination threshold.

In addition, it is noted that the Draft Epping Neighbourhood Plan has not yet been published. The only publicly available information is the resident questionnaire from 2016 and therefore the spatial strategy for the Neighbourhood Plan has not yet been defined, let alone assessed.

e. Conclusion

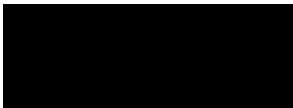
It is clear from the above that the conclusion to remove the Epping Sports Club and Land to the West of Bury Lane is not supported by proper evidence and analysis, and the conclusion drawn within the appendices to the Site Selection Report (2018) cannot be verified or relied upon in the decision making.

We have demonstrated that the site is available, achievable, viable and deliverable, as it relates to the plan making process under the Local Plan and should have been allocated. The decision to remove this allocation is illogical, irrational and is not objective. The removal of this allocation is a missed opportunity for Epping to receive brand new sports facilities within walking distance from the town centre, and further demonstrates that the chosen spatial strategy for Epping is flawed and does not provide the housing or infrastructure required to support the town.

We therefore request that the site is allocated as part of any modifications to the Local Plan through the examination process. In this regard, proposed policy wording is held at **Attachment G**.

Our previous representations with respect to the soundness and the legal issues associated with the Submission Version still stand.

Yours sincerely,



Katie Inglis
ASSOCIATE

Encl.

ATTACHMENT A:

Local Plan Team,
Epping Forest District Council,
Civic Offices,
323, High Street,
Epping,
CM166 4BZ.

3rd May, 2018

Epping Forest District Council – Local Plan Appendix B

I am writing as Chairman of Epping Sports Club, located at Lower Bury Lane in Epping. We are a local and active community group with a genuine interest in the Local Plan. Epping Sports Club, located to the east of Bury Lane, and an area to the west of Bury Lane was previously allocated for a linked development in the Regulation 18 Version of the Epping Local Plan (SR-0113B). We were supportive of the allocation, however to our surprise and disappointment the allocation was removed from the Submission Version of the Local Plan. After seeking advice we would like to point out the following,

Appendix B has now been published and there is reference to the, *“significant number of responses received through the consultation indicated that the site was less preferred by the local community.”*

However there is no published evidence base behind this to support this statement. We would like to request that redacted copies of these responses are made available to us. Without this information it is impossible for us to understand what these objections were.

We would also be keen to understand what *“less preferred”* means as this seems to imply a comparison with other sites, and we would like further information on this process and the other sites we were assessed against.

Additionally there is reference to *“further evaluation”* however there is no explanation as to what the evaluation entailed or what tests were undertaken. We believe that EFDC should provide further detailed information on the specific reasons for why the site was removed from the submission version of the Local Plan.

In correspondence with EFDC Officers reference has been made to the site not being included in the Epping Neighbourhood Plan, but unfortunately we have never been consulted on the Neighbourhood Plan or involved in the process.

We are also not aware that a draft of the Epping Town Neighbourhood Plan has actually been drafted or issued for consultation at this stage. All that is available online is a copy of the findings from the draft questionnaire.

1 of 2

Clearly there is still a lot of information that has yet to be published in order to help us understand why the allocation was removed. We would like to see this information made publicly available. As we have previously expressed we wish to be actively engaged in the Local Plan process, including speaking at the hearings during the Examination in Public.

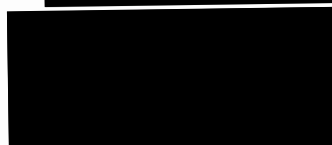
We look forward to receiving a reply from your team on these matters.

Yours faithfully,

John Brades
Chairman, Epping Sports Club



David Watson
Chairman, Epping Tennis Club



Ron Perryman
Chairman, Epping Bowls Club



Dhiru Gadhvi
Chairman, Epping Cricket Club



ATTACHMENT B:

Katie Inglis

From: Oakley, Viktoria <Viktoria.Oakley@lih.co.uk>
Sent: 16 May 2018 16:17
To: Katie Inglis
Subject: Essex County Cricket Board - Lower Bury Lane, Sports Clubs, Epping

Good Afternoon Viktoria and too whom it may concern,

I am writing as the County Representatives of the National Governing Body for Cricket in support, in principle to the following development and the comments made by Sport England.

In summary, through the current review of the Epping Forest Local Plan, a residential site allocation is being pursued for the Epping Sports Club site which is a multi-sports site comprising the facilities of Epping Cricket Club, Epping Tennis Club and Epping Bowls Club. The site contains a senior cricket pitch, four tennis courts, a bowling green and various pavilions and outbuildings that support the use of the three clubs together with ancillary car parking. Related to this would be a proposal to provide replacement facilities for all three sports clubs on an area of agricultural land directly to the west of the site on land west of Bury Lane. While the cricket pitch, tennis courts and bowling green would be replaced on a like for like basis, the relocation would provide the opportunity to rationalise the pavilions and outbuildings into a single sports pavilion that would be shared by the three clubs. The residential development would fund the replacement sports facilities and would represent the 'enabling development'.

The proposed relocation would offer the opportunity to improve the range and quality of facilities offered by the clubs and help ensure the long term sustainability of all of the clubs. In particular, it would offer the following specific benefits:

- A new shared pavilion would provide higher quality changing, refreshment and social facilities for the clubs and offer the opportunity for indoor activities to take place to allow use throughout the year (e.g. indoor bowls). A single shared facility would offer economies of scale and reduce the maintenance costs compared to the current situation of the clubs having to maintain multiple pavilions and outbuildings, some of which require increasing maintenance and repair to ensure that they remain fit for purpose. A modern pavilion facility would also offer revenue generating opportunities (e.g. social events, functions and wider community use) that could help sustain the clubs that the existing pavilions would not be able to offer due to their age, design, condition etc. The new pavilion would be constructed to modern design standards to allow it to be suitable for disabled users and the design and layout would facilitate separate changing rooms to allow the pavilion to be used by male and female teams at the same time.
- The potential to accommodate indoor sports and activity in the pavilion would allow club members to play throughout the year which would assist in retaining members and contribute to the sustainability of the clubs and their facilities;
- The new facilities would offer greater potential for use during the week by the adjoining St John's School which does not have access to cricket facilities on the school site;
- The existing cricket pitch drainage is no longer functioning properly and there have been ball strike risk issues with balls entering adjoining residential properties. The relocation of the cricket pitch would address these issues.
- The new site would offer better vehicular access and car parking provision than the existing site.

Subject to Sports England raising no objection to the proposals, the Essex Cricket Board would have **no objection** to the site allocation being pursued, provided we can be satisfied that the Cricket Club are gaining improved facilities.

The Essex Cricket Board reserves the right to object to any subsequent planning application.

Regards,

Graham Pryke | Cricket Development Manager (Places, Central, North & West)

[Essex County Cricket Board](#)

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ATTACHMENT C:

Katie Inglis

From: Oakley, Viktoria <Viktoria.Oakley@lih.co.uk>
Sent: 16 May 2018 12:53
To: Katie Inglis
Subject: FW: Potential Epping Forest Local Plan Allocation – Epping Sports Club and Land West of Bury Lane, Epping

Viktoria Oakley MRTPI MRICS
Senior Planning Manager



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From: Roy Warren <Roy.Warren@sportengland.org>
Sent: 11 May 2018 09:44
To: Oakley, Viktoria <Viktoria.Oakley@lih.co.uk>
Cc: [REDACTED] <[REDACTED]> Graham Pryke (graham.pryke@essexcricket.org.uk)
<graham.pryke@essexcricket.org.uk>
Subject: Potential Epping Forest Local Plan Allocation – Epping Sports Club and Land West of Bury Lane, Epping

Dear Viktoria

Potential Epping Forest Local Plan Allocation – Epping Sports Club and Land West of Bury Lane, Epping (Sport England Ref: PA/18/E/EPP/48925)

Thank you for your recent correspondence seeking Sport England's advice on the above proposal.

Summary: No objection would expect to be made to this proposal if consulted on a future planning application as a statutory consultee although it is requested that further information is provided at a later stage to confirm this position as set out in this response. The proposals for the replacement sports facilities are expected to be supported as a non-statutory consultee. No objection would be made to the principle of the existing Epping Sports Club site being allocated for residential in the emerging Epping Forest Local Plan subject to a number of pre-requisites being set out in a potential site allocation policy as set out in this response.

Sport England –Statutory Role and Policy

Part of the site (the current Epping Sports Club site) is considered to constitute playing field, or land last used as playing field, therefore Sport England advises that this proposal would require statutory consultation, under the terms of the Town and Country Planning (Development Management Procedure) (England) Order 2015, at the formal planning application stage. Sport England considers proposals affecting playing fields in the light of the National Planning Policy Framework (NPPF) (in particular Para. 74), and its Playing Fields Policy: 'A Sporting Future for the Playing Fields of England', which can be accessed via the following link: www.sportengland.org/playingfieldspolicy. Sport England's policy is to

oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all or any part of a playing field, unless one or more of the five exceptions stated in its policy apply:

Sport England Policy	
Summary of Exceptions	
E1	An assessment has demonstrated that there is an excess of playing fields in the catchment and the site has no special significance for sport
E2	The development is ancillary to the principal use of the playing field and does not affect the quantity/quality of pitches
E3	The development only affects land incapable of forming part of a playing pitch and would lead to no loss of ability to use/size of playing pitch
E4	Playing field lost would be replaced, equivalent or better in terms of quantity, quality and accessibility
E5	The proposed development is for an indoor/outdoor sports facility of sufficient benefit to sport to outweigh the detriment caused by the loss of playing field

Assessment against Sport England Policy

In summary, through the current review of the Epping Forest Local Plan, a residential site allocation is being pursued for the Epping Sports Club site which is a multi-sports site comprising the facilities of Epping Cricket Club, Epping Tennis Club and Epping Bowls Club. The site contains a senior cricket pitch, four tennis courts, a bowling green and various pavilions and outbuildings that support the use of the three clubs together with ancillary car parking. Related to this would be a proposal to provide replacement facilities for all three sports clubs on an area of agricultural land directly to the west of the site on land west of Bury Lane. While the cricket pitch, tennis courts and bowling green would be replaced on a like for like basis, the relocation would provide the opportunity to rationalise the pavilions and outbuildings into a single sports pavilion that would be shared by the three clubs. The residential development would fund the replacement sports facilities and would represent the 'enabling development'. The 'Key Messages' document provided sets out in detail the rationale for the relocation and the benefits that it would offer the sports clubs. In summary, the proposed relocation would offer the opportunity to improve the range and quality of facilities offered by the clubs and help ensure the long term sustainability of all of the clubs. In particular, it would offer the following specific benefits:

- A new shared pavilion would provide higher quality changing, refreshment and social facilities for the clubs and offer the opportunity for indoor activities to take place to allow use throughout the year (e.g. indoor bowls). A single shared facility would offer economies of scale and reduce the maintenance costs compared to the current situation of the clubs having to maintain multiple pavilions and outbuildings, some of which require increasing maintenance and repair to ensure that they remain fit for purpose. A modern pavilion facility would also offer revenue generating opportunities (e.g. social events, functions and wider community use) that could help sustain the clubs that the existing pavilions would not be able to offer due to their age, design, condition etc. The new pavilion would be constructed to modern design standards to allow it to be suitable for disabled users and the design and layout would facilitate separate changing rooms to allow the pavilion to be used by male and female teams at the same time.
- The potential to accommodate indoor sports and activity in the pavilion would allow club members to play throughout the year which would assist in retaining members and contribute to the sustainability of the clubs and their facilities;
- The new facilities would offer greater potential for use during the week by the adjoining St John's School which does not have access to cricket facilities on the school site;
- The existing cricket pitch drainage is no longer functioning properly and there have been ball strike risk issues with balls entering adjoining residential properties. The relocation of the cricket pitch would address these issues.
- The new site would offer better vehicular access and car parking provision than the existing site.

Exception E4 of the above policy is the only exception that could be applied to the proposal for residential on the existing Epping Sports Club site which states in full:

- E4 – The playing field or playing fields which would be lost as a result of the proposed development would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of development

While the proposals are only conceptual at this stage and some of the detail that would need to be provided to provide a definitive assessment as a statutory consultee is not available yet, I would make the following assessment of the principle of the proposals against the criteria in exception E4 based on the information provided:

- Quantity of Provision: The land west of Bury Lane is larger than the area of the existing sports club and could accommodate all of the existing sports and ancillary facilities as demonstrated by the Concept Plan provided and would offer space for future expansion of the clubs if required. In quantitative terms, the replacement site would appear to clearly provide a greater level of provision than the existing site therefore.
- Quality of Provision: While a feasibility study would need to be prepared to demonstrate that the quality of the cricket pitch would be equivalent or better than the existing facility, subject to all of the facilities being designed in accordance with the relevant design guidance, potential exists for all of the facilities to be at least equivalent in quality to the facilities that they would replace. It would be expected that the quality of the replacement facilities would be superior in practice because this is part of the rationale for the relocation and obviously all of the replacement facilities would be new unlike the existing facilities.
- Location: As the replacement site directly adjoins the existing site, there would be no impact on users of the facilities in terms of access. As set out above, vehicular access off Bury Lane would be an improvement over the current access arrangement.
- Management Arrangements: It has been advised that the tenure and site management arrangements would be equivalent or better on the replacement site.
- Phasing: It is understood that the replacement sports facilities would be constructed and operational before the existing Epping Sports Club site was closed and redeveloped for residential. These phasing arrangements would be acceptable although they would need to be secured through a future planning permission.

Based on the above assessment, I am satisfied that in principle the proposal would offer potential to meet all of the criteria in exception E4 of our policy. This being the case, I can therefore advise that if Sport England was consulted on a future planning application for this proposal, **no objection** would be expected to be made as a statutory consultee to the redevelopment of the existing sports club for residential. Furthermore, support would be expected to be offered to the principle of the development of the new sports club site as a non-statutory consultee due to the benefits associated with the relocation. No objection would also be made by Sport England to a potential residential site allocation in the emerging Epping Forest Local Plan subject to the following pre-requisites being set out in a potential site allocation policy:

- The site allocation including the land to the west of Bury Lane and specific reference being made in the allocation policy to this site being developed for the replacement sports facilities to provide certainty that the development of this site for sports facilities is acceptable in principle to facilitate the delivery of the residential allocation. If the land west of Bury Lane was not included in the site allocation, there would be uncertainty about whether the replacement site was deliverable in practice in view of the potential planning policy constraints associated with developing this site;
- The site allocation policy should specifically require that all of the sports facilities at the Epping Sports Club be replaced with equivalent or better facilities, in terms of both quantity and quality, on the Bury Lane site. This would provide some certainty that the replacement facilities would be equivalent or better in quantity/quality terms to help ensure development proposals accord with exception E4 and the NPPF;
- The site allocation policy should require the tenure and management arrangements for the replacement sports facilities to be equivalent or better to the existing arrangements to accord with the above policy;

- The site allocation policy should require the replacement sports facilities to be phased so that they are completed and operational prior to any development commencing on the existing sports clubs site in order to ensure continuity of facility provision for the clubs.

I would therefore suggest that that the 'Suggested Policy Wording' document is amended to incorporate the above pre-requisites if this is being submitted in support of representations on the local plan.

In due course, if the scheme progresses to a planning application, further detail of the proposals would be needed to allow a more definitive assessment to be undertaken of whether the proposals accord with the above policy in practice such as site layouts, design details, management arrangements etc. However, such detail is not necessary to be provided in support of a potential local plan allocation. I would therefore advise Sport England to be engaged at a later date for further advice in this regard. It is advised that a 'no objection' position as a statutory consultee is likely to be subject to various matters being addressed through a section 106 agreement and/or planning conditions such as the phasing and delivery of the replacement facilities and design specifications for the replacement sports facilities.

Sport England reserves the right to object to any subsequent planning application if we do not consider that it accords with our playing fields policy or para 74 of NPPF.

I hope that this response is helpful. I would be happy for this response to be shared with Epping Forest District Council and other interested parties.

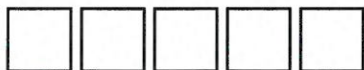
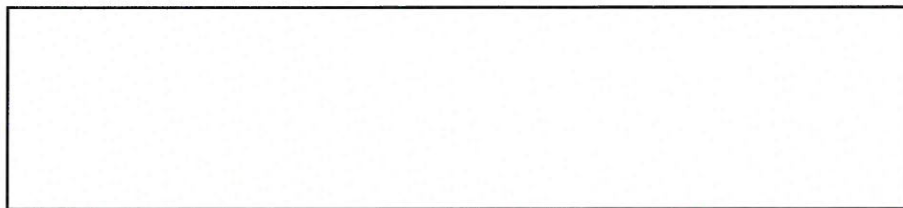
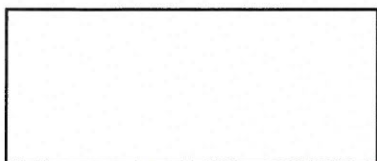
If you have any queries or require any further information please do not hesitate to contact the undersigned.

Yours sincerely,

Roy Warren
Planning Manager

T: [REDACTED]
M: [REDACTED]
F: [REDACTED]
E: Roy.Warren@sportengland.org

Sport Park, 3 Oakwood Drive, Loughborough, Leics, LE11 3QF



ATTACHMENT D:



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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)

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

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.

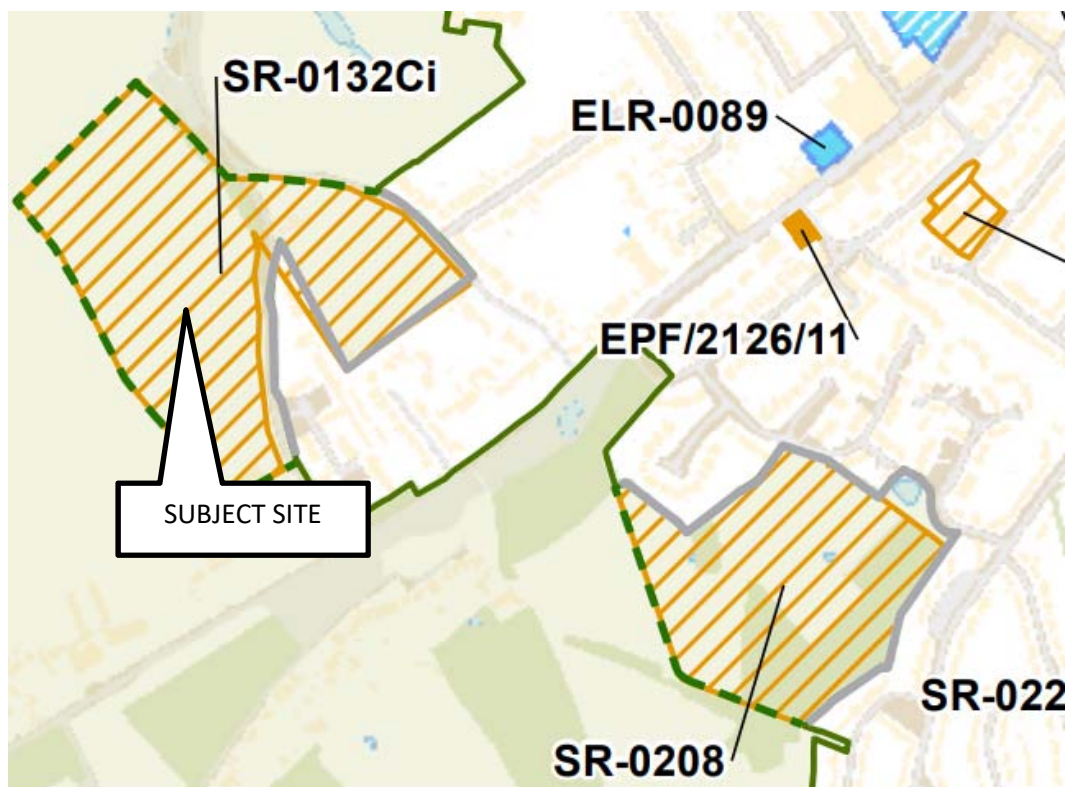


Figure 1: Site Allocation, Draft Local Plan 2016

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

Opportunities and Benefits	Constraints and potential mitigation
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.

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.	Views into and around the site. This can be appropriately mitigated through planting and landscaping on site.
<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>	
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.	
Opportunity to safeguard land for potential future cemetery expansion.	

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.

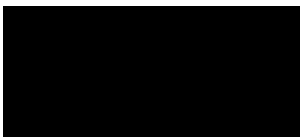
e. Conclusions

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,



Katie Inglis
SENIOR PLANNER

Encl.

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.

cc. Derek MacNabb

ATTACHMENT E:

Site Deliverability Statement (May 2018)

Epping Sports Club and Land West of Bury Lane, Lower Bury Lane, Epping CM16 5HA

Settlement:	Epping
Size (Ha):	8.57ha (Existing Epping Sports Club: 2.21ha & Land West of Bury Lane: 6.36ha)
Site Description:	<p>The site currently comprises the Epping Sports Club which is made up of one cricket oval, four tennis courts and a single bowling green as well as several club house and storage buildings. The Epping St John's School is located to the north of the existing sports club and residential dwellings are located to the north, east and south of the site.</p> <p>The Land West of Bury Lane is currently an open field with residential development to the south and east.</p>
Proposed Use:	Residential development on the existing Epping Sports Club and sports facilities on Land to the West of Bury Lane
Proposed Indicative Development Area (Ha):	6.1ha (Existing Epping Sports Club 1.6ha & Land West of Bury Lane 4.5ha)
Minimum capacity (dwellings):	49



1	Land Control	The site is under one land ownership and Epping Sport Club supports the relocation of club.
2	Site Availability	The site is available for development immediately (0-5 years).
4	Access	Existing Epping's Sports Club – Access already established and can be modified to suit development proposals. Land West of Bury Lane – The parcel abuts Bury Lane and this provides opportunity for direct access into the site.
4	Landscape and Landform	The site is classified under Agricultural Land Classification Maps as Grade 3 agricultural land. No topography constraints for development have been identified.
5	Heritage	A Heritage Impact Assessment was prepared in January 2017. The report concludes that the site has no effect on historic assets and a low potential for archaeological remains. Trial Trenching would be carried out to support any planning application.
6	Conservation Area	The site is not located in a conservation area or within close proximity of any listed buildings.
7	Trees	The development site would not be constrained by the presence of protected trees either on or adjacent to the site. TPOs, Ancient/Veteran Trees and Buffer Land on-site would be accommodated in the scheme design
8	Ecology	Walkover and Desk Top study carried out in October 2017, report demonstrates that ecology within the proposed site can be mitigated and accommodated for. Further Phase 2 Survey work to identify ecological enhancement and mitigation will be undertaken as part of any planning application.
9	Environmental / Ground Conditions	The site has been subject to an environmental desk based assessment. The assessment has confirmed that there are no previous contaminative use and that there are no identified environmental conditions that would impact on the deliverability of the site.
10	Flood Risk	The site sits within flood zone 1 and lies outside the 1/1000 year flood plain.
11	Utilities	The site is within close proximity to existing utilities and these could be readily extended to serve the residential development and sports relocation site.
12	Traffic Impact	The area around the site is expected to be uncongested at peak time, the site is also below the threshold where it would be expected to affect congestion.
14	Viability	The proposal is viable and a Viability Assessment would be undertaken to support any planning application submitted for the subject site

ATTACHMENT F:



The creation of additional public open space with potential for the future expansion of sports club facilities if required.

Existing vegetation local to the site comprises a combination of naturalised hedgerow tree belts, woodland stands and roadside mature tree cover dominated by Oak, Sycamore and Poplar, interspersed with Ash, Birch and Elder. Proposed planting should seek to reference local species mixes and planting styles to offer continuity and assimilation of Green Infrastructure.

Where possible, the retention and management of the existing eastern boundary vegetation will provide a soft interface between new development and existing built form. It would also continue to provide a Green Infrastructure link to the wider network.

4X OUTDOOR
TENNIS
COURTS

SENIOR 9P
CRICKET PITCH

CAR
PARK

Referencing the existing topographical arrangement of the site, the sports club has been located to complement this topography. The cricket pitch has been positioned higher up the the field where the gradient is not so steep.

Proposed built form is located near to the existing Epping settlement edge. This enhances the legibility of the settlement edge and with additional planting will provide a multi layered soft edge to development.

2 STOREY SPORTS
PAVILION

6 RINK
BOWLING
GREEN

Proposed built form is located near to the existing Epping settlement edge. This enhances the legibility of the settlement edge and with additional planting will provide a multi layered soft edge to development.

The retention/enhancement of western boundary vegetation will provide a soft interface between new development and the countryside. Views from the west are also filtered by this vegetation.

Opportunities for utilising adjacent highway for site access onto Bury Lane. Mature trees of merit to be safeguarded, with vehicular access utilising existing gaps within the boundary tree cover where practical.

The settlement of Epping is present on two sides of the site. The entirety of the southern and eastern boundaries are enclosed by development. Ribbon development along High Road (B1393) continues to the west away from the main settlement.

The southern boundary of the site can provide for new planting, utilise native hedgerows, scattered trees, grasses and shrub planting to diversify local Green Infrastructure provision whilst strengthening containment and habitat connectivity

The local topographic arrangement has informed the positioning of proposed facilities. The characteristic sloping topography here would require more ground reprofiling works for facilities than the proposed location.

Key:



Indicative existing tree locations and potential locations for new tree planting.



Indicative existing hedgerow locations and potential locations for new hedgerow planting.

Lands Improvement

OMEGA

Omega Partnership Limited, Architects and Urban Designers
Unit 6, 42 Court, High Street, Thame, Oxford, Surrey, KT1 9BA
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Base plan supplied by the Omega Partnership.
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Project Land to the North West of Epping
Drawing Title Strategic Landscape Proposals - Epping Sports Club

Scale Not to Scale
Drawing No. 10762/P32b
Date May 2018
Checked JJ/TJS

TG Tyler Grange

Marsden Estate, Rendcomb, Cirencester, Gloucestershire, GL7 7EX
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ATTACHMENT G:



Epping Sports Club Allocation

Epping Sports Club and Land West of Bury Lane



Site Address: Epping Sports Club and Land West of Bury Lane, Lower Bury Lane, Epping CM16 5HA

Settlement: Epping

Size (Ha): 8.57ha

Existing Epping Sports Club: 2.21ha

Land West of Bury Lane: 6.36ha

Proposed Use: Residential and Sports Facilities

Site Description: The site currently comprises the Epping Sports Club which is made up of one cricket oval, four tennis courts and a single bowling green as well as several club house and storage buildings. The Epping St John's School is located to the north of the existing sports club and residential dwellings are located to the north, east and south of the site.

The Land West of Bury Lane is currently an open field with residential development to the south and east.

Indicative Development Area (Ha): 6.1ha

Existing Epping Sports Club: 1.6ha

Land West of Bury Lane: 4.5ha

Proposed Use: Residential on the existing Epping Sports Club and sports facilities on Land to the West of Bury Lane.

Indicative Net Density: Approximately 30 dph on the existing Epping Sports Club site

Minimum capacity (dwellings): 49

Development Requirements

Development Proposal: Any development proposal will be required to provide a comprehensive application for the re-development of the current Epping Sport Club site for housing and the re-provision of the Epping Sport Club on Land to the West of Bury Lane as a minimum on a like-for-like basis, replaced with equivalent or better facilities. The replacement sports facilities should be phased so that they are completed and operational prior to any development commencing on the existing sports club site in order to ensure continuity of facility provision for the Epping Sports Club.

Landscape: Development on-site would not appear incongruous if sensitively designed and should consider the utilisation of appropriate boundary treatments and offsets given the surrounding residential context. Such matters should be addressed as a matter of detailed design and this would include the incorporation of retained tree cover within on-site open or amenity spaces across the periphery of the development parcel.

West of Bury Lane the landscape comprises arable land bound by tree belts and field side hedgerow trees. Any proposal should take into consideration aspects including layout form, massing and extent, the retention and enhancement of green infrastructure, the arrangement of open spaces and new planting, materials and development height in order to address wider landscape character and visual matters at the settlement edge.

Ecology: Development proposals will be required to make a financial contribution to access management and monitoring of visitors to the Epping Forest Special Area of Conservation. Such contributions, along with likely provision of required alternative green space, will need to be agreed with Natural England.

Development proposals should be subject to careful design and layout to avoid adverse impacts on the hedgerows and trees that border the site. Appropriate mitigation and enhancement measures to account for loss of habitats, or impacts on protected or notable species, may also be required.

Infrastructure:

The site is located on the edge of the Epping Town Centre which is considered a sustainable location with good public transport accessibility. To promote sustainable transport modes and encourage active transport, development proposals for residential development should limit the provision of on-site residents' car parking to that required to service the essential needs of the development.

Development of the new Epping Sports Club could consider the provision of appropriate parking for the proposed sporting use.
