

Epping Sports Club Matters Statement

January 2019

Matter, Issue and Question	Question asked and Epping Sports Club Response		
M1,I2,Q2a	<p>Has the Plan been prepared in accordance with the adopted SCI, 2013, particularly in respect of the following:</p> <p>2a. How were local residents likely to be affected by proposed site allocations informed?</p> <p><i>Epping Sports Club Response:</i></p> <ul style="list-style-type: none"> <i>No, it has not been prepared in accordance with the SCI.</i> <i>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-0132Ci) . A plan of the allocation is included in the Appendix .</i> <i>P. 18 of the Council's consultation statement says</i> <table border="1" data-bbox="454 715 1429 1121"> <tr> <td data-bbox="454 715 943 1121">Contacting/Engagement with general consultees such as community and amenity groups, resident associations, business sector, developers, landowners and other agencies.</td><td data-bbox="943 715 1429 1121">All general consultees were contacted for comment on the Draft Local Plan as part of the Regulation 18 Consultation, with those who submitted representations listed on the Council's¹² website. If there was need for further engagement on key issues, further meetings and written contact were employed. The developer forum was also a useful platform for engagement. Throughout the plan making process town and parish council representatives were involved in briefings and workshops. All consultees were advised by letter or email of the publication of the Local Plan Submission Version.</td></tr> </table> <ul style="list-style-type: none"> <i>We believe that the Epping Sports Club would fall under the remit of a "general consultee", however the Epping Sports Club was not approached by EFDC to make them aware neither in advance or during the Regulation 19 that their allocation had been removed from the Local Plan.</i> <i>EFDC undertook no consultation with Epping Sports Club or the site owner – Lands Improvement prior to the removal of the allocation.</i> <i>EFDC were aware of the previous support from the Sports Club for the allocation due to correspondence sent by Lands Improvement in September 2017 to EFDC (A copy is included in the Appendix) .</i> 	Contacting/Engagement with general consultees such as community and amenity groups, resident associations, business sector, developers, landowners and other agencies.	All general consultees were contacted for comment on the Draft Local Plan as part of the Regulation 18 Consultation, with those who submitted representations listed on the Council's ¹² website. If there was need for further engagement on key issues, further meetings and written contact were employed. The developer forum was also a useful platform for engagement. Throughout the plan making process town and parish council representatives were involved in briefings and workshops. All consultees were advised by letter or email of the publication of the Local Plan Submission Version.
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	<ul style="list-style-type: none"> • <i>Epping Sports Club was not made aware of the publication of Appendix B despite making representations at an earlier stage in the Local Plan process.</i> • <i>Following the publication of the submission draft of the Local Plan Epping Sports Club directly contacted its ward members at EFDC expressing our concerns and our desire to discuss the future of the Sports Club, however to date Councillor Chris Whitbread and Councillor Holly Whitbread have declined to meet and the only correspondence from them as been through emails from Derek McNab (acting Chief Executive). (Please see appendix for correspondence)</i> • <i>In addition the Regulation 19 consultation was carried out from the 18th December until the 29th January. This incorporated both Christmas and New Year which shortened the time period in which people had to consider the documents and to respond.</i> • <i>The Draft Policy P1 of the Draft Epping Local Plan 2016 simply stated that the allocation (Epping Sports Club and land west of Bury Lane, Lower Bury Lane), could support approximately 49 homes. However it did not explain that this would facilitate to re-location and re-development of new facilities for Epping Sports Club to the west of Bury Lane. This was misleading and did not demonstrate the re-provision of facilities. Public comments submitted at Regulation 18 stage show that the public did not understand this component of the proposal.</i> • <i>Therefore the Sports Club feels that the local community was not properly informed about the development options and therefore that comments may have been made based on an incorrect understanding of the situation.</i> • <i>This is born out in the statistical analysis of the consultation responses.</i> • <i>There were 83 objections to the allocation, however 60 of these objected to the complete loss of the Epping Sports Club questioning where sports facilities for Epping would be located. Clearly residents who would be impacted by the proposals were not correctly informed about the proposals for development.</i>
M1,I2,Q2b	<p>Was the Regulation 19 version of the Plan adequately publicised compared to previous draft versions? Representations indicate that there were no newspaper articles, fliers, public meetings etc.</p> <p><i>Epping Sports Club Response:</i></p> <ul style="list-style-type: none"> • <i>The Sports Club was not invited to attend any public meetings on the Regulation 19 consultation which would have been useful in fully understanding the process and having the opportunity to comment.</i> • <i>There was no reasonable explanation given for the removal of the Sports Club allocation from the Local Plan at this stage.</i> • <i>The Sports Club has also not been invited to attend any meetings with 4G Global who drafted the Playing Pitch Strategy or had the opportunity to submit any information to them to help inform the strategy.</i> • <i>The Sports Club also questions if the correct stakeholders and consultees were made aware of the changes to the Regulation 19 version as Sports England, Essex Cricket Board, Bowls England and the LTA have all provided us with letters stating their support for the principle of the relocation and re-provision of the Sports Club as per the original draft Local Plan. (please see appendix)</i> • <i>The online nature of the consultation made it further harder to access, especially for a number of our members who are less accustomed to using a computer.</i> • <i>Appendix B of the Site Selection Report was missing during the Regulation 19 Consultation so we had no idea why our sports club allocation was removed and therefore didn't have an ability to respond to this matter during the consultation process.</i>
M1,I2,Q2c	<p>Was the online version of the Regulation 19 Plan user-friendly? Did difficulties with document access unreasonably shorten the</p>

	<p>consultation period?</p> <p><i>Epping Sports Club Response:</i></p> <ul style="list-style-type: none"> • <i>The size of the document and the many different elements too it made it hard to access online.</i> • <i>The Sports Club believe that given that Christmas, New Year and the school holidays all fell within the consultation time period that further time for the consultation should have been allowed to make it robust and to ensure everyone had the time and opportunity to comment.</i>
M1,I2,Q2f	<p>Does the absence of Appendix B of the Site Selection Report (and potentially other documents) at the Regulation 19 stage contravene the requirements of the SCI? If so, what are the implications of this for the test of legal compliance?</p> <p><i>Epping Sports Club Response:</i></p> <ul style="list-style-type: none"> • <i>The absence of Appendix B does contravene the requirements of the SCI and is one of the reasons the plan should be found unsound.</i> • <i>The absence of Appendix B was of particular relevance to the Sports Club as our allocation was removed, but we were unable to comment on the reasons for this at the Regulation 19 stage as this information was not published.</i> • <i>When published, we weren't invited to review and respond, we only heard about it through our land owners – Lands Improvement. When we did review the lack of supporting information and explanation of Appendix B was also insufficient.</i> • <i>The Sports Club allocation was stated to have had a "significant number of responses received through the consultation indicating that the site was less preferred by the local community."</i> • <i>However there is no published evidence base behind this to support this statement.</i> • <i>Without this information it is impossible for us to understand what these objections were or for us to address and respond to the points raised.</i> • <i>Additionally there is reference to "further evaluation" however there is no explanation as to what the evaluation entailed or what tests were undertaken.</i> • <i>The Sports Club wrote in response to the Appendix B consultation however the lack of explanation/ glossary of the terms used made it impossible to interpret the reasons for the removal of the allocation.</i> • <i>We requested more detailed information in the form of redacted copies of the relevant responses be provided by EFDC but this has not been forthcoming. (Correspondence attached in Appendix)</i> • <i>We refer again to our concerns raised under M1,I2,Q2a, that due to a lack of correct information about the proposed allocation, that those responding to the Local Plan were not able to do so accurately in relation to this allocation.</i> • <i>Therefore the reference to a "significant number of responses received through the consultation indicated that the site was less preferred by the local community." - should be disregarded as we know that the majority of those respondents did not understand that the club would be re-provisioned as the Council has failed to provide accurate information.</i>

M1,I2,Q3h&i	<p>Has the inclusion and exclusion of specific sites only at the Regulation 19 stage denied some interested parties this opportunity? - What action did the Council take to inform interested parties about significant changes to the Plan?</p> <p><i>Epping Sports Club Response:</i></p> <ul style="list-style-type: none"> • The removal of the allocation at such a late stage allowed no opportunity for the Sports Club to demonstrate its support of the allocation. • In its representation and subsequent approaches to EFDC Ward Member, Epping Town Council and others the Epping Sports Club was clear about its need for re-provision to secure its long term future. • The allocation had been included in previous versions and the Sports Club was not contacted about the removal of the allocation prior to the Regulation 19 consultation. • The Sports Club was also not aware of any real opposition to the site and therefore had no reason to fear its removal. • We are not aware that the Council or any of its consultants responsible for inputting into the Local Plan have ever visited the Sports Club to view its current state and its need for re-provision. • Lands Improvement, the site owners have also written directly to the Council once they took ownership of the site to make clear their support for the allocation, their willingness to work with us and the Council to deliver new provision. However, they were also not contacted with regards to the removal of the allocation. • In his email on 22nd March and included in the Appendix Derek McNab (EFDC Acting Chief Executive) stated "It was our reasonable assumption that as your landlords they would be in communication with you as the Submission Version was agreed." • It is not Lands Improvements responsibility as landlords but the Council's under their SCI to advise the public as to their proposals in the Local Plan. We do not believe this was not a reasonable assumption at all. • Furthermore, it is clearly the Council's responsibility to plan for sport and health of their communities. • In the same email Derek McNab further stated "ultimately the future of the Sports Club is in the hands of your landlords" however this not true either, especially as the allocation by the Council would facilitate this.
M1,I7,Q1-6	<p>1. Does Appendix 2 need to explain which policies of the new Plan supersede which policies of the old plans? Could this be confusing and would it be sufficient to simply list the plans and policies to be superseded?</p> <p>2. What does the "submission policies map" consist of? Is it just the single map of the whole district printed at 1:30,000 scale at A0 size, or does it include the A4 Maps within the Plan itself?</p> <p>3. Is the geographic illustration of all relevant policies in the Plan shown on the submission policies map?</p> <p>4. Whether or not the A4 maps in the Plan form part of the submission policies map, are the legends clear and comprehensive? Some of the legends include designations not shown on the maps and <i>vice versa</i>. For example, the legend for Map 2.2 includes Traveller allocations, but there are none on the map. By contrast, Map 2.2 includes diagonal green hatching and green and brown dots which are not on the legend. Should such inconsistencies be resolved throughout the plan?</p> <p>5. Does the Plan include a Key Diagram as required by paragraph 157 of the NPPF?</p> <p>6. Will the indicators in Appendix 3 enable the effectiveness of the Plan's policies to be monitored?</p> <p><i>Epping Sports Club Response:</i></p>

	<ul style="list-style-type: none"> <i>We believe that throughout the plan there needs to be more transparency for the policies and allocations which supersede older versions and most importantly an explanation for why this decision has been taken.</i> <i>This should also include a table of key amendments, a list of the amendment, its rationale and the physical evidence behind why this decision has been taken.</i> <i>It should also make clear at what stage in the process decisions were taken and by whom these were made. The removal of the Sports Club allocation was made behind closed doors and was not debated at any Council meeting as far as the Sports Club is aware.</i> <i>There should be consistency throughout the plan of how allocations and policies are referred to and legends should be provided to all maps and charts.</i> <i>The Sports Club is a key example of many local groups in the district who are no doubt eager to be involved in the Local Plan process, and who have vital contributions to make, but are not technical planners and therefore the Local Plan needs to be understandable and accessible to everyone.</i>
M2,I1,Q3	<p>Do the vision and objectives adequately reflect the Plan's aims for air quality, green and blue infrastructure, protection of the landscape and biodiversity, and healthy living? Should specific reference be made to the aim of conserving or enhancing the historic environment, including archaeology?</p> <p><i>Epping Sports Club Response:</i></p> <ul style="list-style-type: none"> <i>We do not believe that the plans aim for healthy living is adequate or that the content of the plan will help to meet its aspirations.</i> <i>Sport is a key part of providing a healthy lifestyle and opportunities for exercise for the local community.</i> <i>The removal of the allocation which would have allowed for the re-provision of the Epping Sports Club, allowing them to expand and offer greater opportunities for the population of Epping is contradictory to the aspirations of the Plan.</i> <i>The Sports Clubs expressed in its representations during the consultation of the need for re-provision to secure its long term future. Indeed if the Sports Club in Epping ceases to exist it will negatively impact the opportunities for healthy living of its existing members.</i> <i>There is very limited provision elsewhere in Epping for existing Sports Club members to re-locate to if the Sports Club was no longer able to function. The nearest other sports clubs are at Woodford Wells (8 miles away) and Sawbridgeworth (10 miles away)</i> <i>Epping Bowls Club has 40 playing members plus life members and spouses of members who also play at the club</i> <i>Epping Tennis Club has 92 playing members plus life members</i> <i>Epping Cricket Club has 35 playing adults plus 15 colts (young members) plus an additional 10 life members.</i> <i>The Club is looking to promote sport (a key part of healthy living) within the community and in addition to regular league matches, Epping Bowls Club hosted 'Come & Try' sessions in July for over 60 Year 8 (age 12-13) students from Epping St John's School. Many of the students had never heard of or seen Bowls played before, therefore this offered the students the opportunity to try something new, while also meeting the school's plans to offer alternative sports to students at the end of the school year. Due to the success of this initiative, there are plans to establish the 'Come & Try' sessions as a regular annual event, for both juniors and adults alike.</i> <i>Epping Cricket Club - new impetus has been created within the Club, and so for the 2019 season, is looking to increase the number of senior teams from three to five, while also planning to increase Colts cricket opportunities for boys and girls alike.</i>

	<ul style="list-style-type: none"> • <i>Epping Tennis Club also provides group and private lessons through their LTA Senior Coach, with over 50 juniors receiving regular coaching.</i> • <i>Securing the long term future of the Epping Sports Club is crucial to helping to meet this aspirations for healthy living within Epping Forest District for all generations.</i> • <i>The current state of the buildings at Epping Sports Club and the physical constraints on the size of the site (Photos in Appendix) severely limits the ability of the club to grow and thrive in the future.</i> • <i>Significant investment is needed to upgrade the facilities and therefore the long term future of the Club can only be secured through the re-development of the current site and the re-provisioning of the clubs on a new site with new facilities where the clubs can expand an flourish.</i> • <i>The quote to resurface just one tennis court runs to nearly £15,000, with in excess of £10,000 required to re-surface the car park. The club is funded my membership fees with a limited amount of sponsorship only, and is entirely run by volunteers. There are no paid staff.</i> • <i>This is a position fully supported by the club and the land owner Lands Improvement.</i>
M4,I4,Q2	<p>Are the changes proposed to the Green Belt boundary informed by a robust assessment of the contribution made by individual sites to the purposes of the Green Belt (EB74A-B; and EB705A-B)? How were the findings of the Green Belt Review weighed in the balance with other planning considerations in the site selection process?</p> <p><i>Epping Sports Club Response:</i></p> <ul style="list-style-type: none"> • <i>In relation to the draft allocation SR0113B the Epping Sports Club believes that the assessment in the Green Belt Review is flawed and should be amended to include the re-provision site for the Sports Club on Bury Lane.</i> • <i>Whilst we appreciate the site would be technically in the greenbelt this piece of land is adjacent to the existing residential edge and is not part of the open countryside.</i> • <i>We do not understand why when the Epping Sports Club, which is identified as having a very low level of harm to the greenbelt is disregarded when other sites considered to have very high level of harm are included.</i> • <i>The removal of the site from the greenbelt and provision of new sports facilities here would have very limited impact on the adjacent greenbelt.</i> • <i>The majority of the provision – cricket pitch, tennis courts, car park and bowls green would be at surface level. Lands Improvement provided a potential plan for the layout of the site within their own representation to the Council.</i> • <i>This included significant additional planting creating a defensible greenbelt edge.</i> • <i>The only two storey building onsite would have potentially been a sports hall or pavilion which would have been located close to the existing residential edge which already has properties of a similar scale.</i> • <i>The Sports Club believes that the re-provision site serves as greenbelt in only a limited capacity and its re-development for sports use would have been a real benefit to the local community, and that when weighed in the planning balance the greenbelt function should have been given less weight.</i>

	<ul style="list-style-type: none"> • <i>The other benefits of the location of the site – its connectivity to the Town Centre, to St Johns School, the local transport networks including Epping Station should have been given more significant weight.</i> • <i>Additionally the proposal would mitigate the access issues currently experienced by St Johns School and the Sports Club by providing new car parking and school drop off/pick up facilities.</i> • <i>We also question how the greenbelt assessment has been undertaken and why the land to the west of Bury Lane allocated within the Regulation 18 Local Plan in conjunction with the Epping Sports Club, is located within a much larger parcel (069.3) without any consideration as to the mitigation and landscaping proposed for this allocation and therefore unfairly skews the Green Belt Assessment of this parcel.</i> • <i>We believe that this site was unfairly prejudiced due to concerns about further development of the greenbelt on this side of Epping.</i> • <i>We understand that sports facilities are acceptable in the Green Belt under National Policy so why is that not the case here? In the absence of any robust Green Belt justification we contend that this allocation should have been considered solely on its own merits and that the Council's Green Belt evidence is fundamentally flawed.</i>
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Appendix - Site Allocation in Draft Local Plan 2016

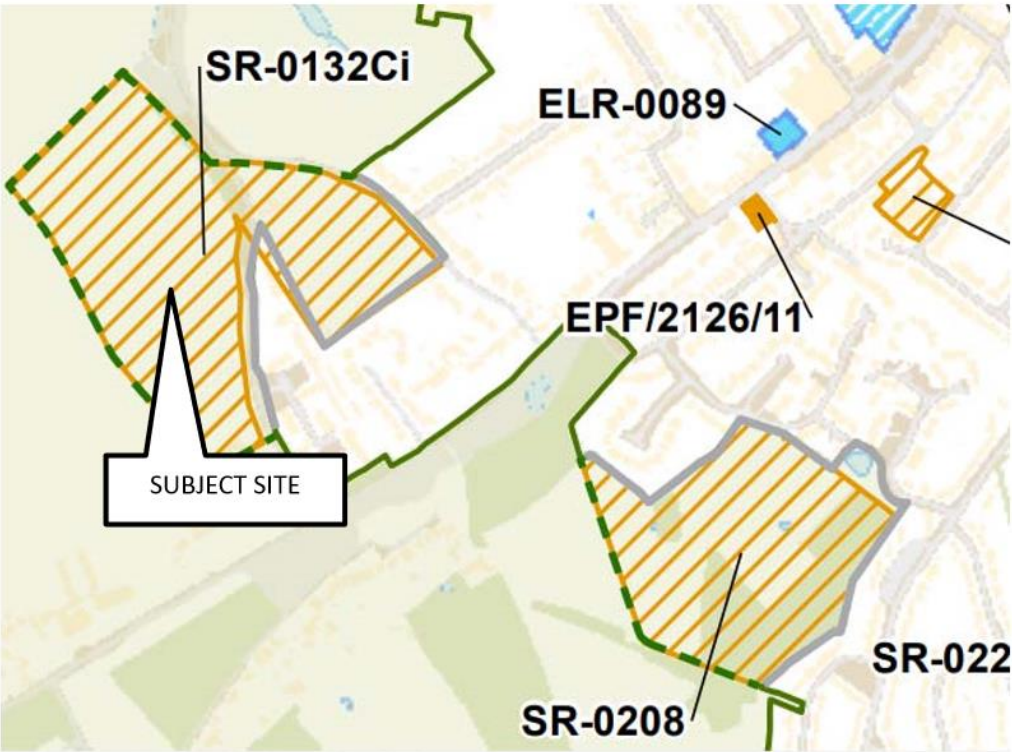


Figure 1: Site Allocation, Draft Local Plan 2016

Information Pack for Epping Forest District Council

DELETE REPLY REPLY ALL FORWARD

Mark as unread

John Brades <IMCEAEX-
_O=FIRST+20ORGANIZATION_OU=EXCHANGE+20ADMINISTRATIVE+20GROUP+
28FYDIBOHF23SPDLT+29_CN=RECIPIENTS_CN=00037FFECA1151E3@eop-
EUR02.prod.protection.outlook.com>

To:

Oakley, Viktoria <Viktoria.Oakley@lih.co.uk>;

Dear Viktoria,

Following our meeting on 19th September and our subsequent discussion, I understand that you are seeking to submit this email as part of a pack of information to Epping Forest District Council. The purpose of this pack is to reinforce the allocation of the sports ground and relocation site on Bury Lane and to justify extending the area of land allocated on Bury Lane north towards the cemetery. The aim being to ensure that sufficient land is identified to accommodate and facilitate the possible re-provision, expansion and enhancement of the sports clubs and also where appropriate to respond to local needs that the Council are identifying as part of their Open Space, Playing Pitch and Indoor Sports Study.

As chairman of Epping Sports Club, (cricket, tennis and bowls clubs) I make the following observations regarding the relocation of the sports clubs:

- Our current facilities are in the main insufficient for modern day purposes and need significant investment to bring them up to fully acceptable standards for accommodation, play and coaching.
- It is a fact that our current location inhibits any expansion to enable us to carry out the necessary works to achieve our aspirations for growth.
- We are all seeking to grow our memberships and need new impetus and improved facilities to do this.
- In our demised lease agreement there is an option for us to take up relocation as close as possible to where our existing ground is based. The location identified is close to town, with good access for our members.
- It is true to say that if a new and improved facility were offered to us it is something that we would have to carefully consider. There is no doubt that it would help us retain and attract new memberships whilst offering us the opportunity to generate additional revenue perhaps by renting out facilities to the community all year round.
- Any enhanced and expanded facility would need to offer an opportunity for our sports to be played all year round.
 - A fresh approach including the possibility of new facilities will be more attractive to local advertisers and sponsors.

Although at an early stage of our relationship with you as the new owners, we are interested to explore the possibility of relocating, and in particular building a level of confidence with yourselves as landowner, with the District Council and with the Town Council.

Kind regards, John
07769 704133

John Brades
Chairman
Epping Sports Club

From: Shirley Hawkins [<mailto:SHawkins@eppingforestdc.gov.uk>]
Sent: 22 March 2018 15:36
To: 'john.brades@live.com' <john.brades@live.com>
Cc: Will Breare-Hall <wsbh@hotmail.co.uk>; Councillor Holly Whitbread <holly.whitbread@btinternet.com>; Julie Chandler <JChandler@eppingforestdc.gov.uk>; William Marr-Heenan <wmarrheenan@eppingforestdc.gov.uk>
Subject: Epping Sports Club (Site SRO132Ci)

Dear Mr Brades

Thank you for your recent correspondence regarding Epping Sports Club and your concerns about the future. I note that you have sent the same letter to District Councillors Holly Whitbread and Will Breare-Hall.

Having now been in receipt of further advice from colleagues in our Policy Planning Team, I can see that your site (titled SRO132Ci) was originally put forward by the Copped Hall Estate as part of the wider call for sites exercise undertaken as part of the initial development of the Local Plan.

You are also correct in your understanding that the site was included as part of the Regulation 18 Draft Local Plan Consultation, which was undertaken in late 2016. However, a significant number of responses received through the consultation indicated that the site was less preferred by the local community. Taking this into consideration and on the basis of further evaluation, other sites in Epping were considered to be preferable in terms of their overall deliverability, noting the timescales for the availability of the site and its marginal viability. The conclusion reached on deliverability, (the Council must convince any future Planning Inspector that the sites included in the Submission Version 2017 of the Local Plan, could practically come forward during the plan period up to 2033) was based on information provided by the site promoter, Copped Hall Estates. This indicated that the site viability may be marginal as a result of the costs associated with the relocation of the sports facilities.

As a result of these considerations and on the basis that the other alternate sites in Epping allocated, would cumulatively provide the required growth in Epping, the Sports Club site was excluded. Epping Town Council have also not supported the development of the Epping Sports Club in their emerging Neighbourhood Plan.

In answer to your point about liaison with the Sports Club, as per all other sites we have been in communication with, the site promoters, who I now believe are the new owners of the Copped Hall Estate, Land Investments. It was our reasonable assumption that as your landlords they would be in communication with you as the Submission Version was agreed. Land Investments and your Club Members did have the opportunity to make further representations during the publication period from 18 December to the 29 January.

Whilst the District Council acknowledges the important role that voluntary sports clubs play in providing valuable health and wellbeing opportunities, as evidenced by our community development work to include grant-aid etc, ultimately the future of the Sports Club is in the hands of your landlords.

As planning authority we have developed our draft plan based on an evidence based approach in accordance with the National Planning Policy Framework. Unfortunately, it was Members judgement that there were better sites in the District to accommodate the required level of growth.

If a meeting was to be held regarding the future of the Club, I would propose that it would be therefore more appropriate for the Council to send an officer from our community leisure team who could provide advice around future funding/grant aid etc, rather than a policy planner.

Regards

Derek Macnab
Acting Chief Executive

Potential Epping Forest Local Plan Allocation – Epping Sports Club and Land West of Bury Lane, Epping

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CONTINUE EDITINGDISCARD

Mark as unread

Roy Warren <Roy.Warren@sportengland.org>

Fri 11/05/2018 09:44

To:

Oakley, Viktoria <Viktoria.Oakley@lih.co.uk>;

...

Cc:

John Brades <john.brades@live.com>;

Graham Pryke (graham.pryke@essexcricket.org.uk);

...

To help protect your privacy, some content in this message has been blocked. To re-enable the blocked features, click here.

To always show content from this sender, click here.

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: 020 7273 1831

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F: 01509 233 192

E: Roy.Warren@sportengland.org

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

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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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John Brades
Chairman
Epping Sports Club
Lower Bury Lane
Epping
Essex, CM16 5HA

13th December 2019

Subject: Epping Sports Club Letter of Support

I am writing this letter to provide the LTA's support to the proposed facility development at Epping Sports Club in principle to the following development and the comments made by Sport England

In summary as a result of the Epping Forest Local Plan the current Tennis, Cricket and Bowls facilities will be relocated to an area of agricultural land directly to the west of the site on the land west of Bury Lane. While the 4 Tennis Courts, Senior Cricket Pitch, a bowling green and various pavilions are to be replaced on a like for like basis, this relocation project would give the opportunity to rationalise the pavilions into a combined sports pavilion that would be utilised by all 3 sports clubs. The Residential Development could fund the replacement sport facilities.

The relocation proposals would offer the opportunity to improve the quality of facilities available to these clubs and would help to secure the long term sustainability of the clubs. In particular the benefits would be:

- 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. A single shared modern facility would reduce maintenance costs it 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 local education venues
- 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 LTA would have no objection to the site allocation being pursued, provided we are satisfied of the improvement in facilities.

This letter is an indication of support for the scheme but is not a guarantee that the project will receive LTA funding.

In the meantime if you require any further help or assistance then please do not hesitate to contact me.
Yours sincerely,

A handwritten signature in black ink, appearing to read 'JDashwood'.

Joshua Dashwood
LTA Club & County Manager



Chief Executive:
Tony Allcock MBE
Bowls England
Riverside House, Milverton Hill,
Royal Leamington Spa,
CV32 5HZ
01926 334 609
www.bowlsengland.com

John Brades – Chairman
Epping Sports Club
Lower Bury Lane
Epping, Essex
CM16 5HA

14th January 2019

Dear John,

EPPING BC, ESSEX

I am writing on behalf of Bowls England in support, in principle, of the proposed development at Epping Sports Club. 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 Bowls Club, Epping Cricket Club and Epping Tennis Club.

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

1. A new shared pavilion that 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 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 are not able to offer due to their age, design and condition.
2. 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.
3. The new site would offer better vehicular access and car parking provision than the existing site.

Subject to Sport England raising no objection to the proposals, Bowls England would have no objection to the site allocation being pursued, provided we can be satisfied that the Bowls Club is gaining improved facilities. Bowls England reserves the right to object to any subsequent planning application.

I trust this letter meets your requirements but if you do need more information or assistance please contact Alistair Hollis on 07765 050408 or e-mail: alistair@bowlsengland.com

Yours sincerely

Tony Allcock MBE
Chief Executive – Bowls England

RE: Epping Sports Club (Site SR0132Ci)
DELETE REPLY REPLY ALL FORWARD
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John Brades <IMCEAEX-
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To:

Shirley Hawkins <SHawkins@eppingforestdc.gov.uk>;

Cc:

Will Breare-Hall <wsbh@hotmail.co.uk>;

Councillor Holly Whitbread <holly.whitbread@btinternet.com>;

Julie Chandler <JChandler@eppingforestdc.gov.uk>;

William Marr-Heenan <wmarrheenan@eppingforestdc.gov.uk>;

cwhitbread@eppingforestdc.gov.uk;

Dear Mr McNab,

Thank you for your email and coming back to me on behalf of Councillor Whitbread.

In your email and as now published in Appendix B, there is reference to the *“significant number of responses received through the consultation indicated that the site was less preferred by the local community.”* I would be very grateful if you could provide more detail on these, and ideally copies of the responses to the Regulation 18 consultation in relation to the site?

Please could you also explain what is included within *“further evaluation”* which suddenly meant the allocation was removed?

I understand that the site is not included in the Epping Neighbourhood Plan, but unfortunately the executive of the Sports Club committee has never been contacted or consulted on the Neighbourhood Plan or involved in the process.

With regards to your suggestion that we meet a representative from the community leisure team, I had already previously met with James Warwick and Fabrizio Ferrari from the Council. At that meeting they both expressed their surprise about the change in the allocation and now fully understand my concerns over the future of the Club.

Both Chris and Holly Whitbread are Ward Councillors for the Epping Sports Club and I would be grateful for the opportunity to meet with them to talk through the issues that the club is facing and reasons why we were supportive of the allocation and linked development in the Draft Local Plan. Without the allocation our very existence is threatened which would be a huge loss to the Town. In conjunction with the loss of the Sports Centre, it feels as if the Council has no regard to the sports provision in the town and would prefer to see services elsewhere in the district rather than fight to retain them in Epping.

I look forward to hearing from you or indeed Councillor Whitbread.

With best wishes,

John Brades

Chairman, Epping Sports Club

Appendix - Epping Sports Club Photos

Epping Sports Club Photos

Epping Cricket Club





Epping Tennis Club



Epping Sports Club Car Park

