

Matters Statement from Epping Sports Club

MATTER 14: Infrastructure and Delivery

Issue 4: Is Policy D4 effective? 1. For the purpose of Parts B and C, how will a developer know specifically whether and what community infrastructure is required as part of the scheme?

Development proposals will be permitted where they:

(i) Retain and maintain existing facilities that are valued by the community; or (ii) Improve the quality and capacity of facilities valued by the community. B. Proposed developments should contribute to the provision of new or improved community, leisure and cultural facilities in a way that is proportionate to the scale of the proposed development and in accordance with the standards in the Infrastructure Delivery Plan and Essex County Council's "Developers Guide to Infrastructure Contributions (2016)"

C. Strategic and larger developments will be expected to make on-site provision for community, leisure and cultural facilities where feasible. For smaller developments a financial contribution will be sought where required.

D. Financial contributions will be sought for the ongoing maintenance of community facilities, where appropriate.

E. The provision of new facilities will be appropriately phased to meet the needs of the community they are provided for.

F. Where opportunities exist, the Council will support the co-location of community, leisure and culture facilities and other local services.

G. Proposals that would result in the loss of valued facilities currently or last used for the provision of community, leisure and cultural activities will only be permitted if it is demonstrated that: (iii) The facility is no longer needed for any of the functions that it can perform; or (iv) It is demonstrated that it is no longer practical, desirable or viable to retain them; or (v) Any proposed replacement or improved facilities will be equivalent or better in terms of quality, quantity and accessibility and there will be no overall reduction in the level of facilities in the area in which the existing development is located;

or (vi) The proposal will clearly provide sufficient community benefit to outweigh the loss of the existing facility, meeting evidence of a local need.

H. The change of use of existing community facilities or premises (whether designated or undesignated) to other uses will not normally be permitted unless the applicant can demonstrate through evidence, including marketing of the site, that there is no longer a reasonable prospect of the site being used for the existing community uses.

I. The Council will work positively with national governing bodies and communities, including local voluntary organisations, and support proposals to

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies.

Epping Sports Club Response

*Given the importance of participating in sports as a part of securing healthy lifestyles, it is not enough to say that development proposals will be permitted where they retain and maintain existing facilities. Development proposals over a certain size should be **required** to improve the quality and capacity of facilities. We appreciate that contributions will need to be proportionate to the scale but the importance of sports and leisure provision should not be underestimated. It is also important that a range is delivered. At present there is a good range of sports clubs in Epping which serve all ages in the local community. It is important the contributions are used to support a range of facilities, that provide opportunities for a whole mix of sporting opportunities and not just traditional main stream sports or fitness facilities / gyms. The Epping Sports Club believes that its re-provision and expansion could help to meet the need that will be created by the new development proposed in and around Epping.*

Consideration should also be given in this policy, to referring the social side of sports and the benefits that this can bring to all those involved. There are over 200 members in the Epping Sports Club and the club plays an important role for all of its members. The Epping Sports Forum represents in excess of 1,000.

We agree that both off site and on site contributions should be made by developers, however it is unclear to us what the expectation is with respect to infrastructure (ie. how much sport provision, open space and community provision should be provided by each development?) to ensure there is a baseline by which to determine the amount and types of contributions required. As far as we can tell, there is no policy within the Local Plan that outlines the quantitative requirements for different types of open space and recreation facilities expected to be generated on a per 1,000 people basis. We therefore question the effectiveness of Policy D1 in delivering the infrastructure needs to support existing and future residents in Epping, without an understanding of the baseline and what each site is expected to deliver.

We believe that the nature of the contributions should not be determined alone by the size of the site, but in discussions with local sports Clubs such as to Epping Sports Club and the Epping Sports Forum to understand at a grass roots level the best and most effective way of creating new provision. For example it may be more appropriate to pay for upgrades to existing facilities e.g. providing flood lights, which will expand its use, rather than providing a new pitch in an isolated location.

It is important to ensure that these contributions filter down to the lowest level to provide additional infrastructure and opportunities and that the funding is not lost in the process. The contributions should be ring fenced to ensure that the agreed contributions cannot be diverted to another source. The Epping Sports Club site was initially allocated for re-provision in the Local Plan with the re-development of the former Sports Club site. This is a key opportunity to secure the delivery of a new sports facility. We would consider this to be an especially prudent move, even more so in light of the ambiguity about what will happen at the St Johns site. Even if the St Johns site is developed, we believe there is such significant demand for new sporting facilities, that it will need to be supported by an additional facility providing further sporting opportunities and a re-provisioned Epping Sports Club adjacent to Bury Lane is well placed to deliver this.

(D) We support the need to secure ongoing maintenance of facilities. The Epping Sports Club is all too well aware of the amount of maintenance required for sporting facilities and the difficulty of securing funding for this. We would also propose that the policy should suggest maintenance to a level required by the Governing body of the individual sports being provided for.

(E) We understand the need for phasing but would note that especially with sports clubs it is often the process that someone joins a club and remains there for many years and therefore the opportunities for provision need to be there from the start, otherwise they will travel to other clubs outside the district. It is this exact reason that existing local clubs should be consulted when funding is being spent to ensure that they can offer new provision, in order to keep new players representing the local area in which they live.

(F) We support the principle of the co-location of services. The re-provision of the Epping Sports Club on a new site with new facilities would be perfectly positioned in close proximity to Epping St Johns School, the Town Centre and Train Station. The opportunity on the re-location site would also allow the potential for other clubs to operate from here.

This would no doubt have significant benefits in providing and greater provision of sporting opportunities in one place, allow the clubs to support each other and would most likely lead to cross pollination of players between different sports. A new facility for the Epping Sports Club is likely to also include a new clubhouse and function room that could be used for local events and by the local community.

(G) We are delighted with the provision of Section G into the policy as under these terms the sports Club relocation site would meet and exceed the aspirations of this policy, especially in relation to part (v) as our proposed replacement would be better in terms of quality, quantity and accessibility and the relocation site is adjacent to the existing sports club location.

This policy is important as the value of facilities is incredibly high and if lost without proper assessment of local need, the facilities will never return. We were supportive of our landlord (Lands Improvements) proposal to relocate the Sports Club site and we are confident in the delivery of significantly better provision. The Epping Sports Forum believes that there is already a deficit in facilities in Epping to meet the current need and this is only likely to get worse with more people living in the area. If this was to reduce further as a result, the impact would be more significant and the ability of new residents to access the required facilities would be exceptionally challenging. On that basis, we would ask the Inspector and Epping Forest District Council to look again at the allocation of the Lower Bury Lane Sports Club site and the re-provision site which clearly meets this policy.

Additionally, the Statement of Common Group Update of 18th March 2019 ref: EB1508 between Essex County Council and Epping Forest Council states that:

EFDC and ECC agree that the proposed amendment supplementing the explanatory text to Policy DM 4 (Green Belt) provides sufficient clarity on the proper application of Policy DM 4 (Green Belt), as follows: "A number of community and education sites in the District are located within areas designated as Green Belt. The Council acknowledges that due to the extent of the Green Belt in Epping Forest District, there may be instances where new buildings related to community or educational uses may be proposed (e.g., a new village hall or new buildings related to an existing school). In accordance with national planning policy such proposals will be considered inappropriate development which should not be approved within the Green Belt except in very special circumstances. As such community and educational facilities are generally considered to be essential uses within the District. When determining whether very special circumstances exist, a clear locational need for such facilities will be a material consideration that weighs in favour of granting planning permission and should be accorded appropriate weight."

In this statement EFDC clearly acknowledges the constraints that the scale of greenbelt in EFDC and states that "there may be instances where new buildings related to community or educational uses

may be proposed.” The relocation site for the Sports Club is within the greenbelt (albeit adjacent to the edge of Epping Town) and contends that the new buildings it requires to secure its future are exactly the type of community provision that this policy agreed by EFDC and ECC should support.

The Epping Sports Club has continued to argue about the importance of the Epping Sports Clubs and their long-term survival to local people in Epping and the surrounding villages. EFDC and ECC’s Statement of Common Ground update acknowledges that community and educational facilities are considered essential and we would argue that the Epping Sports Club is an essential community use. Without it, the local community will not have access to the sporting, health and social opportunities that it provides. Clearly under this policy we believe that the Epping Sports Club allocation on Lower Bury Lane and its re-location and re-provision site on Bury Lane, should be reinstated into the Local Plan.

In relation to (iv) we would also add here that we believe part of the role of EFDC in planning is to assess different applications on their individual merits given the specifics of each scheme – and weigh them in the planning balance. In the case of the Epping Sports Club we have a set of decaying buildings that are in need of significant refurbishment or replacement in order to secure the long term future of the club. The playing of cricket is these days constrained by the houses that have been built adjacent to the ground since its inception at the site in 1910, and flying cricket balls travel further these days and are a potential risk to passers-by and the houses. The cricket pitch itself has drainage problems during rainy periods as the underground drainage system has largely collapsed. The tennis club needs room to expand and grow, and the Bowls Club needs an indoor facility to halt the drift away of members during the winter months, changing it to an all year round facility in keeping with other bowls clubs. In this situation there would be NO loss with the existing facility as the Club would be re-provisioned, there would only be benefit in the form of increased sports provision and potential new affordable and market housing on the current Sports Club site.

(1) We hope that EFDC will work positively with governing bodies and local voluntary organisations. It has been the Sports Club and Sports Forum’s experiences to date that EFDC have been reluctant to work with us to secure the future delivery of sports facilities in Epping. The Sports Club would welcome additional text here including a commitment from EFDC to hold discussions with Local Sports Groups on a regular basis so they can understand the position on the ground. The Sports Club has already stated its disappointment with the level of engagement from the Council and from 4Global.

MATTER 15: Places and Sites (Policies P1-P15)

Issue 2: Are the Plan’s policies for the specific places and sites within the District justified, effective and consistent with national policy; and are the specific site allocations they include justified and deliverable? Policy P1: Epping

Epping Sports Club Response:

The Epping Sports Club has serious concerns that the development proposed for Epping does not come with the necessary infrastructure to support the new housing and that the housing is located in the wrong place. It will be impossible for anyone located on the South Epping site to travel into Epping Town centre by any other means than by car. It is clear that new residents will not walk up the long and fairly steep hill into the Town Centre every time they wish to go there, regardless of

what the preferred policy might be. This is completely unsustainable and does nothing to promote healthy lifestyles within the local community.

The decision to develop the Sports Centre site, will seriously reduce sporting and fitness opportunities in the town. It will negatively impact the Gymnastics, badminton and squash clubs who will have no where to train at all. As far as we are aware there is no certainty at all about the re-provision of the St Johns Road site, we have no way of telling what leisure provision will be made there and as far as we are aware there has been no consultation with the Epping Sports Forum on what should go there. The current development brief for the site is from as far back as 2012. Additionally EFDC has chosen not to re-provision the Epping Sports Club site which also puts the future of the Sports Club in jeopardy. In 2.10.17 the Build Facilities Strategy states:

“Furthermore, with the growth of family-orientated households, demand for team sports and playing pitch provision is likely to increase, with adults also requiring high quality ancillary provision, to improve the overall experience of spectating or coaching.”

Epping Town is facing a very real threat of having very limited sports opportunities on offer in the future, and the Local Plan seems to ignore this statement in the Built Facilities Strategy.

The Sports Club would also question the deliverability of the South Epping site, within the Local Plan period. We believe that there should be a focus on smaller, more deliverable sites that are in more sustainable locations. The proposed new site for Epping Sports Club and the current site are all within easy walking distance of Epping tube station, and Epping Town Centre. The sites are also immediately adjacent to Epping St Johns School.

To this end we strongly propose Policy P1 should include the allocation of the Sports Club site on Lower Bury lane for re-development into residential and the re-provision of the sports clubs onto Lower Bury Lane. We believe this would be sensible because:

- 1. The current site is already bounded by existing residential development on both sides, and therefore housing here would be in keeping with the immediate surroundings.*
- 2. The landowner, Lands Improvement and the Sports Club are committed to working together to deliver a successful and high quality scheme, that would benefit the local community extensively. The Sports Club is unable to sustain their long term future at their current site. They have been a key local group who have been part of the fabric of the town for the past 150 years at least. Our future really is hanging in the balance, and its closure would be a significant loss to Epping. 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 and flourish. This is a position fully supported by the club and the land owner Lands Improvement.*
- 3. We believe that our current site could be developed in the short term, bringing forward much needed housing in a sustainable location.*

MATTER 16: Development Management Policies (DM1 – DM22) Issue 1: Are the Development Management Policies in the Plan justified, effective and consistent with national policy in respect of the specific matters set out below? Are there any other issues concerning their soundness?

Policy DM6: Designated and Undesignated Open Spaces

10. Having regard to paragraph 73 of the NPPF, has a robust assessment of the need for open space, sports and recreational facilities been carried out? Is it justified to base the requirements upon nationally adopted standards rather than local ones and should the appropriate standards be set out in Policy?

Epping Sports Club Response

The Epping Sports Club does not believe that a robust assessment has been carried out. Both the Epping Sports Club and the Epping Sports Forum do not believe that adequate provision exists for the current need or the future need. There is still no clear plan for the St Johns Road site and it appears that much is being made of leisure provision here. However, the site is constrained in terms of its size and therefore it cannot deliver all things to all people.

As a local Sports Club we are only too well aware of the complete disconnect that can sometimes occur between national adopted standards and what is practically possible on the ground. The Sports Club has met with Sport England to discuss our concerns and they wrote a letter supporting our position that the site and its re-provision site should have been included in the Local Plan. Then without any warning we see that Sport England now have a statement of common ground with EFDC. As far as we are aware this is a complete change of position without any discussion with any local sports clubs. We also have letters from Bowls England, Essex Lawn Tennis Association and Essex Cricket Board supporting our position, but it clearly hasn't reached up the chain.

In order to continue to meet the ever-increasing national standards for sport in England, newer and increased provision is needed and the assessments carried out as part of the Local Plan process do not meet this requirement. The Plan needs to be workable in real life to deliver tangible outcomes for the people on the ground. Therefore, it needs to have its base in the local area, not in national policy that is applied across the board with no discretion applied.

11. Which policy in the Plan deals with needs for built facilities for sport and recreation, rather than open space?

Epping Sports Club Response

We cannot find any specific policy in the Local Plan which deals with sports and recreation, either in terms of built facilities specifically or outdoor facilities such as pitches. There are references in the plan to recreational facilities, outdoor sports and infrastructure to support development, but nothing to specifically deliver sports facilities. We believe the plan is very much lacking in this respect and that a clear policy that sets out EFDC's aspirations for the delivering of sporting, relevant recreational facilities and associated infrastructure for both indoor and outdoor sport would be of significant benefit to everyone.

This would also help to give clarity on a number of other areas in the plan including SP3 (ix), the greenbelt policy, Policy D2 and the specific site allocation policies. Through a clear policy we hope that this will help with securing the long term future of sporting facilities in the district.

At no point in time has anyone from 4G Global or from Epping Forest District Council requested to come and view the facilities at the Epping Sports Club. We are aware from other local sports groups

that are part of the Epping Sports Forum that they have also had a similar experience. 1.3.2 of the Build Facilities Strategy talks about key user clubs and we would be keen to understand who these were.

Had 4 Global or EFDC taken the time to meet with us, they would have understood that there is already a lack in provision. The Built Facilities strategy states that there are serious health inequalities within the district and therefore we do not understand why greater importance is not being placed on the provision of sports and recreation facilities. Surely given the overall drive towards having a healthy society, we believe a policy is needed, of which sports can play a key role.

The Build Facilities strategy only looks at sports halls larger than 3 badminton courts, swimming pools and health & fitness suites. It does not consider issues relevant to Epping Sports Club such as indoor cricket nets, indoor bowls, smaller sports halls or pavilions and community spaces associated with sporting provision. If EFDC had taken the time to engage with the sports clubs in Epping they would understand that these span a wide range of clubs which need numerous different types of facilities. A policy that looks to support the development and growth of all of these clubs, rather than make their future even more uncertain than they currently are would be positive for the whole district.

In their Matters Statement (19STAT0024) Essex County Council suggests that the matters of Health and Wellbeing have not been properly addressed in the Local Plan:

“Within policies, health and wellbeing are not necessarily highlighted in that their objective is to achieve net gains to health or to support the meeting of health partners to address their objectives.”

It later goes on to

“recommended that an over-arching Health and Wellbeing policy be included within the Plan so that it is clear to readers that EFDC is fully committed to using the planning process to ensure that positive health and wellbeing is part of the objectives of the Plan”

and the Sports Club believes that such a policy should acknowledge the important role that local sports clubs play in achieving this.

We would propose the inclusion of a policy that addresses health and wellbeing as well as built facilities for sport and recreation and acknowledges that the two are linked. The policy should make clear:

- (i) *The importance of delivering first class sporting facilities in sustainable and accessible locations, to allow opportunities for all those who participate in sports, from an infant level upward to competing on a regional and national level.*
- (ii) *The value sports clubs and facilities in terms of health and wellbeing benefits for all ages within the community, and therefore the necessity of needing to be able to play these sports throughout the year, with both indoor and outdoor facilities, in order to secure the ongoing health benefits.*
- (iii) *The Sports Clubs social and cultural value to the communities they serve. The social side of sports clubs extends much further afield and reaches out into the community, creating a shared sense of being and belonging.*
- (iv) *The importance of ongoing maintenance of such sports provision and services so that they remain a high standard and continue to be well used. This also supports clubs in their development so they in turn can provide ever increasing opportunities.*

- (v) *The need to provide sporting opportunities for the expanding population, and the important role that existing clubs should have in helping to shape this offering, to ensure that it is deliverable, and is actually delivered at a grass roots level.*