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26 January 2018

Local Plan Regulation 19 Representation  
Planning Policy Team  
Epping Forest District Council  
Civic Offices  
323 High Street  
Epping  
Essex CM16 4BZ

Dear Sirs

**RE: FARM TYRES AND LAND ADJOINING AT SEWARDSTONE ROAD XX.  
EPPING FOREST DISTRICT LOCAL PLAN SUBMISSION DOCUMENT.  
CONSULTATION RESPONSE FOR MR MARK GREGORY.**

Please find enclosed a completed Response Form, Parts A and B, together with two Appendices supporting the Response.

Appendix A sets out the background to this Response following the failure of the Local Planning Authority to accept this site which was proposed in a submission of a Call for Sites Response 31 July 2017, and then refers to the subsequent correspondence on the matter. It also summarises attempts to bring the site to the Local Planning Authority's attention for inclusion in their Brownfield Register which at the time of submission still has not been published despite the statutory requirement to publish by the 31 December 2017, with the Emerging Local Plan being progressed without due co-ordination in any event. These documents could and should have been co-ordinated with the Local Plan being published along with the Brownfield Register.

The failure to co-ordinate and publish the Brownfield Register at the same time or at least within the Consultation Period of the Local Plan is a major flaw in the preparation of this Development Plan Document and the current consultation.

Appendix B sets out the further reasons why the Local Plan is unsound and how it needs to be amended. It should properly consider the settlement of Sewardstone, which clearly now is a village settlement of some size, with a built up area population of around 650 at the 2011 Census, and with some facilities, for which development boundaries do now need to be set. It is a location that provides employment and leisure facilities as well as a care home. Further development here would also improve the local rural economy and the viability of existing services.

Furthermore the Local Plan should have had a comprehensive evidence base to fully and properly review all available brownfield/previously developed land for future development, both within, and without, the defined settlement boundaries of the District. This exercise has clearly not been properly or comprehensively undertaken in sufficient detail as this Response will make clear.

The omission of the Farm Tyres site and the land adjoining it being a clear example of this failure. There has been a further failure of the Authority to respond positively to this site being brought to the attention of the Authority in good time for inclusion in the current version of the Plan. This being further evidence of a lack of pro-active plan making and effective consultation. The absence of any reference to Sewardstone in P12 which is said to refer to Sewardstone also suggests a rushed approach.

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Document file reference: EFDC LOCAL PLAN RESPONSE JAN 2018 FARM TYRES 17553.

The omission of a fully comprehensive brownfield evidence base appears to have resulted in more greenfield and green belt land being allocated for residential development than might have proven necessary or needed. Further work by the Local Planning Authority is thus required on the brownfield sites potential and settlement boundaries before this Plan can be adopted as it is unsound.

This needs to be brought to the Examiner's attention.

I should be pleased to discuss the matters arising from this Response with the Authority should it now wish to do so.

Yours sincerely

Alan Wipperman BA MRICS MRTPI C Dip AF

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