



Epping Forest  
District Council

[www.eppingforestdc.gov.uk](http://www.eppingforestdc.gov.uk)



## Representation form for Submission Version of the Epping Forest District Local Plan 2011-2033 (Regulation 19 publication)

This form should be used to make representations on the Submission Version of the Epping Forest District Local Plan which has been published. Please complete and return by 29 January 2018 at 5pm. An electronic version of the form is available at <http://www.efdclocalplan.org/>

**Please refer to the guidance notes available before completing this form.**

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**Please return any representations to:** Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ

Or email them to: [LDFconsult@eppingforestdc.gov.uk](mailto:LDFconsult@eppingforestdc.gov.uk)

**BY 5pm on 29 January 2018**

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This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

***Please attach any documents you wish to submit with your representation***

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### Part A

1. Are you making this representation as? (Please tick as appropriate)

a) Resident or Member of the General Public ☐ or

b) Statutory Consultee, Local Authority or Town and Parish Council ☐ or

c) Landowner ☐ or

d) Agent ☒

Other organisation (please specify)

2. Personal Details		3. Agent's Details (if applicable)	
Title	MR.		MR.
First Name	MARK		ALAN
Last Name	GREGORY		WIPPERMAN
Job Title (where relevant)	PROPRIETOR		PRINCIPAL
Organisation (where relevant)	.....Redacted.....		ALAN WIPPERMAN & Co.
Address Line 1	.....Redacted.....		MILL HOUSE
Line 2	.....Redacted.....		LITTLE BARDFIELD
Line 3	.....Redacted.....		BRAINTREE
Line 4	.....Redacted.....		ESSEX
Post Code	.....Redacted.....		CM7 4TN
Telephone Number	///		01371-811488
E-mail Address			alanw@alanwipperman.co.uk

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**Part B – If necessary please complete a separate Part B form for each representation**

4. To which part of the Submission Version of the Local Plan does this representation relate?  
(Please specify where appropriate) **SEE APPENDIX B AS SUBMITTED.**

Paragraph  Policy  Policies Map

Site Reference  Settlement **SEWARDSTONE**

5. Do you consider this part of the Submission Version of the Local Plan:

\*Please refer to the Guidance notes for an explanation of terms

- a) Is Legally compliant Yes ☒ No ☐  
b) Sound Yes ☐ No ☒

If no, then which of the soundness test(s) does it fail\*

Positively prepared ☒ Effective ☒

Justified ☒ Consistent with national policy ☒

- c) Complies with the duty to co-operate Yes ☒ No ☐

6. Please give details of why you consider the Submission Version of the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments

THERE HAS NOT BEEN A THOROUGH ASSESSMENT OF AVAILABLE/POTENTIALLY AVAILABLE BROWNFIELD/PREVIOUSLY DEVELOPED LAND WITHIN THE DISTRICT AND AT SEWARDSTONE, ESPECIALLY SMALLER SITES BEFORE CONSIDERING AND ALLOCATING SITES FOR STRATEGIC ENVIRONMENTAL ASSESSMENT AND THEN FOR ADOPTION IN THE LOCAL PLAN. THE BROWNFIELD REGISTER SHOULD HAVE BEEN AVAILABLE TO BE CONSIDERED DURING THE CONSULTATION PERIOD OF THE ~~REP~~ SUBMISSION COPY PLAN. THE REGISTER WAS NOT CONSULTED UPON. SITES THAT HAVE BEEN PUT FORWARD IN THE 'CALL FOR SITES' MAY NOT ALL HAVE BEEN FULLY ASSESSED OR CONSIDERED AT ALL, OR INVESTIGATED AS THEY COULD HAVE BEEN. EVIDENCE OF THIS IS THE ~~.....Redacted.....~~ SITE WITH THE FORMER HEADLANDS BUNGALOW. FURTHER EVIDENCE AND CASE IS SUBMITTED IN APPENDICES A & B ATTACHED. NO CONSIDERATION OF SETTLEMENT BOUNDARIES TO SEWARDSTONE HAS BEEN UNDERTAKEN IN (Continue on a separate sheet if necessary) DETAIL, OR WHETHER SEWARDSTONE SHOULD BE TAKEN OUT OF THE GREEN BELT TO ACCORD WITH THE NATIONAL PLANNING POLICY FRAMEWORK. THE PLAN AND APPROACH IS UNSOUND.



7. Please set out what change(s) you consider necessary to make the Submission Version of the Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1/ ALL POTENTIAL SITES FOR DEVELOPMENT THAT ARE WHOLLY OR MAINLY BROWNFIELD SHOULD BE CONSIDERED AND ASSESSED AS PART OF A STRATEGIC ENVIRONMENTAL RE-ASSESSMENT, AND IF NOT, THEN THE .....Redacted..... SITE SHOULD BE RE-ASSESSED.

2/ IF THIS IS NOT CONSIDERED ESSENTIAL THEN THE SITE SHOULD BE ADDED TO THE PREFERRED SITE ALLOCATIONS TO BE AVAILABLE FOR RESIDENTIAL REDEVELOPMENT WITHIN THE 10-15 YEAR PERIOD OF THE PLAN, WHEN THE SITE WILL BECOME AVAILABLE.

3/ THE REASONS FOR THIS BEING DONE AND POSSIBLE ARE SET OUT IN APPENDIX B TO THIS RESPONSE AND IN SUMMARY ARE IN (i) TO (iv) BELOW:

(i) THE SITE IS BROWNFIELD LAND AND SHOULD BE INCLUDED ON PART 1 OF THE AUTHORITY'S BROWNFIELD REGISTER WHEN PUBLISHED, OR NEXT REVIEWED

(ii) THE SITE SHOULD BE CONSIDERED FOR RESIDENTIAL REDEVELOPMENT BEFORE ANY GREENFIELD OR GREEN BELT SITES ARE RELEASED TO ACCORD WITH THE CURRENT NPPF AND NPPG AND THE DRAFT 25 YEAR ENVIRONMENT PLAN TO MEET CURRENT OBJECTIVELY ASSESSED HOUSING NEED OR ANY FURTHER REQUIREMENTS & NEEDS TO BE MET ARISING FROM THE MINISTERIAL STATEMENT, 14 SEPTEMBER 2017.

(iii) NO RESIDENTIAL ALLOCATION HAS BEEN MADE FOR THE SEWARSTONE SETTLEMENT AND THIS DOES NOT ACCORD WITH THE NPPF.

(iv) THE SITE WOULD IMPROVE THE RESIDENTIAL AMENITIES & VIABILITY OF THE

(Continue on a separate sheet if necessary)  
SEWARSTONE SETTLEMENT WHICH HAS SERVICES WITHIN REASONABLE SUSTAINABLE ACCESSIBILITY, E.G. SCHOOLS, SHOPS, SURGERIES, PUBLIC HOUSES ETC.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

(v) SEWARSTONE VILLAGE SHOULD BE TAKEN OUT OF THE GREEN BELT.

☐ No, I do not wish to participate at the hearings

☒ Yes, I wish to participate at the hearings



9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

1. IT IS NECESSARY TO ATTEND TO PROPERLY CONSIDER THE TECHNICAL EVIDENCE AND ASSESSMENT OF PART OF THE FARM TYLES SITE & THE WIDER DEFICIENCIES OF THE AUTHORITY'S FAILURE TO PROPERLY CONSIDER ALL BROWNFIELD LAND POTENTIALLY AVAILABLE IN THE DISTRICT.
2. THE FAILURE TO PREPARE AND PUBLISH THE BROWNFIELD REGISTER PRIOR TO ISSUING THE LOCAL PLAN SUBMISSION DOCUMENT FOR CONSULTATION.
3. THE NEED TO HAVE PROPER REGARD TO HOUSING AFFORDABILITY IN THE OBJECTIVELY ASSESSED HOUSING NEEDS FOR THE DISTRICT AND THE FAILURE TO PROPERLY AND FULLY PREPARE THE PLAN TO AVOID HAVING THE FULL AND PROPER REGARD TO EMERGING NATIONAL METHODOLOGIES TO ASSESS LOCAL HOUSING NEED, AND
4. TO ASSESS & CONSIDER THE MERITS OF THE FARM TYLES SITE AS A PREFERRED SITE FOR HOUSING IN THE PLAN AND THE NEED FOR SOME HOUSING ALLOCATION FOR SEWARDSTONE

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

FOR SEWARDSTONE

10. Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination (Please tick)

☒ Yes

☐ No

11. Have you attached any documents with this representation?

☒ Yes

☐ No

Signature:

.....Redacted.....

Date:

26/9/2018