

## **Epping Town Neighbourhood Plan Examination**

### **Questions of Clarification and Note of Interim Findings from the Examiner to the Town Council and EFDC**

Having completed my initial review of the Neighbourhood Plan (the Plan), I would be grateful if both Councils (as appropriate) could kindly assist me in answering the following questions which either relate to matters of fact or are areas in which I seek clarification or further information. Please do not send or direct me to evidence that is not already publicly available. I also set out some interim findings and a proposed course of action.

#### ***Questions of clarification***

1. Please confirm the dates of the pre-submission (Regulation 14) consultation period.
2. **Policy 1: Protection of the Forest and Green Belt** refers to 'Epping Greenways' to accord with the District Council's Green Infrastructure Strategy and proposals are shown on Map 1. Please could you give the reference for the Greenways in that document or point me to any other already published evidence that supports this policy and tell me what is the premise of this idea and how might these be delivered?
3. There are various references to a Design Guide and Character Appraisals – Annex C in the Plan. These do not appear to have been included in the Plan? Please advise.
4. **Policy 9: Epping Town Centre**; please could you clarify the intent of this policy?
5. In line with the representation from EFDC, please could Table 2 on page 36 of the Plan be updated and paragraph 10.1 updated accordingly? Please provide me with this Table and updated paragraph so I can recommend an appropriate modification.

#### ***Interim Findings and Likely Recommended Modifications to the Plan and its Policies***

##### **Potential Changes to the Plan**

At this stage, I would like to make the Town Council aware that unfortunately I have found that it will be necessary to make quite a lot of modifications to policies and the supporting text. In some cases, I regard these changes to be minor revisions, but others could be regarded as more significant particularly by those involved in the production of the Plan and of course by the local community.

In essence, the policies subject to deletion are likely to be Policies 2, 4, 5 and those subject to modification are likely to be Policies 7, 8, 10, 11, 13, 14, 15, 16 and 17 with varying degrees of amendment. Policies 1, 3, 6 and 9 are discussed elsewhere in this Note.

I have also identified a number of sections of the Plan which I consider would benefit from editing. This is largely as a result of references which are now out of date as time has passed and things have moved on such as the Local Plan has now been adopted or where there is some repetition for example. I consider that, with some editing, these sections would be clearer and more robust. I would therefore like to invite the Town Council, working with EFDC, to prepare some revised wording to help me to recommend

appropriate modifications in my report. The revised text should be agreed between the Town Council and EFDC working together. I have set out the likely list of potential deleted policies above and so of course there is little merit in altering the supporting text for these policies. I hope by setting out those areas which, in my view, would benefit from an edit, it will be clear as to the scope of the work I am seeking.

**Section 2** of the Plan should be updated in the light of the adopted Local Plan and to make it clear that the Plan does not allocate sites for housing development or modify Green Belt boundaries over and above what is in the Local Plan. In addition, now historic information could be removed.

**Section 5** of the Plan would benefit from some updating and revision to help with accuracy and clarity in relation to **Policy 3: Development Proposals**. Policy 3 seems to be a partial list of sites allocated in the Local Plan. The policy should either refer to all of the site allocations in the Local Plan which are still applicable or none of them. If this policy simply duplicates policies at Local Plan level, it is not needed. Depending on the answer to this, please provide me with substitute text that has been agreed between the Town Council and EFDC. This will then help me to recommend an appropriate modification in my report. As part of this, details about site selection are given, but it is my understanding that the Local Plan has allocated the sites and the Plan does not seek to allocate any new or different sites? I am also unclear as to what Annexes A and B are? What is the source for Table 1; does this need updating? Has a Masterplan for South Epping been prepared?

**Section 6** of the Plan would benefit from some updating and correction. Is **Policy 6: Enhancing Epping Station** still relevant given the stance of the adopted Local Plan?

Additionally, a number of representations point to the need for the Community Aspirations boxes on pages 21 and 22 of the Plan to be changed, amended and updated. Please provide me with substitute text that takes account of the representations from Essex County Council, City of London and Transport for London and has been agreed between the Town Council and EFDC to enable me to recommend an appropriate modification in my report. If aspirations such as the desire for a health hub for example are important to the local community, these can be retained in the Plan as long as it is clear they are an aspiration and do not form part of any planning policy.

**Section 11** of the Plan contains a lot of information and is a little repetitive, particularly in relation to what are community aspirations in both reviewing the Conservation Areas and developing a list of non-designated heritage assets. Some correction is also needed to paragraphs 11.1, 11.2 and 11.4 and the Community Aspirations box in the interests of accuracy.

**Section 13** of the Plan contains an ambitious Action Plan which is, in principle, to be welcomed as a structured method of looking at proposals and responsibilities and how these might be achieved. Please could I ask that the Town Council and EFDC consider the action plans and items in paragraphs 13.4 and 13.5 and perhaps consider amalgamating the policies and aspirations together and change the title?

It is important for me to emphasise that these changes should be to make corrections to ensure that the Plan is accurate, update the Plan in the light of the now adopted Local Plan, remove historic information, avoid repetition and be clear. It is not an opportunity to add new or different content to the Plan. I should also point out that, depending on the nature of the changes, consideration will be given as to the need for a further short period of public consultation after receiving the suggested revisions. The need for further public consultation will depend on the difference between the text in the submitted Plan and the changes put forward. This is therefore another reason to keep any changes within the scope set out above.

I understand this will be disappointing news to those involved in the production of the Plan. I am drawing the Town Council's attention to this scenario now as recommending numerous changes can come as an unpleasant surprise on receipt of my report and mean that community ownership of the Plan becomes diluted. I must also ensure I am not rewriting the Plan (and indeed would not wish to, or be appropriate for me to, do so) in making modifications.

In inviting the Town Council working with EFDC to suggest these changes, this is an unusual situation where I find that the content of most of the policies can largely be modified to meet the basic conditions as necessary, but that the supporting text seems to have evolved over a number of years and is now not quite right to retain as presented. For me the best approach is to invite an 'edit' of the relevant sections to be undertaken and put forward by the authors of the Plan alongside EFDC.

I am not inviting any comments on the potential changes to the Plan at this stage. I am also not seeking, and will not accept, any representations from other parties regarding any of the matters covered in this Note at this stage.

I am conscious that the responses to the queries and the edits will take some time to prepare, but I am keen momentum is not lost. I would therefore be grateful to receive this information by Wednesday 30 April. If this is completed earlier, then I will be able to progress the examination more quickly.

It may be the case that on receipt of your anticipated assistance on these matters that I may need to ask for further clarification or that further queries will occur as the examination progresses. These queries are raised without prejudice to the outcome of the examination. Where I have invited changes to be suggested, this is entirely without prejudice to my consideration of the issue.

This Note will be a matter of public record and should be placed on the relevant websites at earliest convenience.

With many thanks,

Ann Skippers MRTPI  
Independent Examiner  
31 March 2025