

Supplementary Committee Agenda 2



**Epping Forest
District Council**

Stronger Place Select Committee Tuesday, 29th September, 2020

Place: Virtual Meeting on Zoom

Time: 7.00 pm

Democratic Services: V Messenger Tel: (01992) 564265
Email: democraticservices@eppingforestdc.gov.uk

9. LOCAL ECONOMIC BUSINESS RECOVERY

Please note that a verbal report will be provided at the meeting.

10. PLANNING DEVELOPMENT AND IMPROVEMENT PROGRAMME

(a) To consider progress on the North Weald Airfield Masterplan

Please note that a verbal report will be provided at the meeting.

11. DRAFT SUSTAINABILITY GUIDANCE FOR THE DISTRICT AND HARLOW AND GILSTON GARDEN TOWN (Pages 3 - 22)

To consider the Cabinet report on the Draft EFDC Sustainability Guidance - Appendices E (Quality Review Panel Report) and F (Equality Impact Assessment).

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Harlow and Gilston Quality Review Panel

Report of Chair's Review Meeting: Harlow and Gilston Garden Town Sustainability Guidance

Friday 24 January 2020

Frame Projects, 44-48 Wharf Road, London, N1 7UX

Panel

Peter Maxwell (chair)

Sophia Cox

Judith Sykes

Attendees

Tara Gbolade

Epping Forest District Council

Ione Braddick

Epping Forest District Council

Alison Blom-Cooper

Epping Forest District Council

David Watts

Harlow District Council

Allison De Marco

Frame Projects

Sarah Thwaites

Frame Projects

Apologies / report copied to

Nigel Richardson

Epping Forest District Council

Deborah Denner

Frame Projects

1. Project name

Harlow and Gilston Garden Town Sustainability Guidance

2. Aims of the Quality Review Panel meeting

The Quality Review Panel provides impartial and objective advice from a diverse range of highly experienced practitioners. This report draws together the panel's advice and is not intended to be a minute of the proceedings. It is intended that the panel's advice may assist project and development management teams in making design improvements where appropriate and in addition may support decision-making, in order to secure the highest possible quality of development.

3. Background

The Harlow and Gilston Garden Town Sustainability Guidance and Checklist is being prepared to promote sustainability standards supporting the delivery of the Harlow and Gilston Garden Town vision and principles, and the local planning authorities (Harlow, Epping Forest District and East Herts) environmental and sustainability policies. The document has been produced by the in-house Harlow and Gilston Garden Town project team. It is intended to be used by planning officers and applicants. A RAG (Red, Amber, Green) checklist is intended to be used by officers and at QRP review sessions.

The Sustainability Guidance will be reported to the Garden Town Member board with a recommendation for endorsement and agreement to take back to three district councils- giving it some material planning weight when considering applications.

The panel is asked to comment on: the document's legibility, whether it is sufficiently robust to be implemented by officers and applicants; whether it is ambitious enough; any omissions; and how strong incentives can be incorporated to encourage applicants to aim for 'best practice'.



4. Quality Review Panel's views

Summary

The Quality Review Panel warmly welcomes and supports the work being undertaken in developing the Sustainability Guidance – it promises to be a helpful tool in guiding applicants and officers in interpreting and applying adopted sustainability policies within the Garden Town. While the panel commends the broad scope and audience of the Guidance, it recommends prioritising and focusing on where it can have the greatest and most immediate impact. It will also be important that the document can adapt as targets shift over the Garden Town project's long-term delivery. The panel strongly recommends being clearer about outcomes sought – this will ensure the document's longevity and relevance. While the panel thinks the Sustainability Guidance will be an excellent tool supporting pre-application discussions, it would like to hear more about how the Guidance will be applied during the planning application stage and post-completion. It will be critical to consider training and resourcing as part of the business case for the Garden Town project. It also recommends setting higher targets – these should match the ambition of the Garden Town. While the panel supports the overarching aims and structure of the document it recommends refinements including: work to close the gap between sustainability and placemaking; greater emphasis on the importance of masterplanning; clarity about definitions, including zero carbon; renewable / low carbon hierarchy; fabric performance; circular economy; and socio-economic sustainability. It also provides advice on testing the guidance and notes some omissions. Further details on the panel's views are provided below.

Approach and priorities

- The panel strongly supports the aim of the Sustainability Guidance – in providing timely guidance on how to implement the adopted and emerging environmental and social sustainability policies of the five authorities, within the Garden Town.
- The scope of the Guidance is broad, as is its potential audience. It will be critical to prioritise elements that are more readily achievable in the short term, against those that need more time.

The case for change

- The panel has been asked to comment on how developers can be incentivised to aim for best practice.
- The panel thinks this can be achieved by developing a strong narrative describing the inevitability of changes being made across the industry, including the national regulatory context. A low carbon future will bring huge opportunities for built environment professionals with expertise delivering net zero schemes. The panel highlights that the future will reward these developers – and those that do not adapt, will become uncompetitive.



- It thinks the case for change, and incentives for adopting best practice standards, can be worked into the front section of the document – possibly articulated as a ‘manifesto for change’.

Outcomes

- The Guidance will benefit from greater clarity in the strategic sustainability outcomes that it seeks to achieve. This will set a framework for understanding and evolving individual sustainability requirements over time.
- For example, the panel points to the ‘Green Infrastructure and Biodiversity’ section which sets requirements using an Urban Greening Factor matrix. While these granular requirements will aid sustainable outcomes, it recommends more explicitly emphasising a key desired outcome – such as net biodiversity gain.

Efficacy and application

- The panel thinks the Sustainability Guidance will be an excellent tool supporting pre-application discussions.
- It wonders however how the Guidance will be applied during the planning application stage. It questions the type and volume of documentation the Guidance will require that developers submit – and by whom and how it will be assessed. The panel thinks it will be critical to consider training and resourcing as part of the business case for the Garden Town project (see below).
- It also wonders how commitments made at planning application stage will be monitored and enforced.

Ambition and targets

- Given the long-term delivery of the Garden Town’s strategic sites, up to 25 – 30 years, it will be important to ensure minimum requirements are aspirational enough.
- The panel understands the pressures that will come with setting ambitious targets – but it will be important that the Garden Town clearly ‘sets out its stall’. It does not think some of the targets are high enough to be considered best practice – and recommends they be further considered. For example, it recommends setting the minimum BREEAM targets higher.
- It will be important to show leadership – championing high sustainability standards for the Garden Town’s own public sector projects.



Audience

- The panel understands the Guidance is intended to be read by a broad audience – from homeowners, to housebuilders and local authority officers. It thinks this is a challenging ambition.
- The panel questions whether aiming the document at such a broad audience from the outset is the most effective way of implementing the ambitious changes required, quickly.
- The panel recommends, in the first instance, focusing on audiences who will have the biggest purchase. For example, housebuilders and local authority officers.
- If elements of the Guidance are to be aimed at homeowners they will need to be more explicit – and further work undertaken on how digital presentation could aid accessibility.

Placemaking and masterplanning

- The panel recommends further work to close the gap between environmental and socio-economic sustainability and placemaking. It recommends giving the document more spatial specificity – to show how environmental and socio-economic sustainability objectives can go hand in hand.
- It commends the way the Sustainability Guidance identifies the importance of Orientation and Form as part of the ‘Design Approach: First Principles’ at Pages 12 – 13. However, the panel recommends this should also emphasise other aspects of masterplanning in supporting sustainability.
- Decisions made at a masterplan scale will be fundamental in either supporting or hindering how individual buildings perform. It points to BioRegional and CABI guidance produced to support the eco-towns – which emphasised the importance of exemplary placemaking and masterplanning.
- It recommends being explicit about a hierarchy of masterplanning issues – for example, green infrastructure, biodiversity and water. It recommends including masterplanning as a category within the RAG Checklist.

Final score v final RAG checklist

- The panel has been asked to comment on whether the Guidance should aim to provide a ‘final score’ for schemes assessed against the requirements set. It thinks a ‘final score’ could have unintended consequences.
- It suggests a final RAG checklist that sets ‘mandatory’ minimum requirements for specific core / important categories – where it would be unacceptable to fail. For example, mandatory requirements in respect of potable water use.



- It recommends looking at a combination of ‘mandatory’ minimum requirements plus ‘recommended’ minimum requirements.

Implementation and monitoring

- The panel wants to understand how implementation will be monitored, to ensure commitments made at planning application stage are delivered on the ground. It highlights how post-planning decision pressures such as value-engineering and user behaviour can impact on how schemes perform in reality.
- A monitoring and evaluation process will also enable a circular process, where feedback influences future iterations of the Guidance.

Local authorities: resourcing and upskilling

- The panel highlights the importance of supporting behavioural change, to enable the Guidance to be implemented effectively.
- It strongly recommends directing efforts and resources on training, support and upskilling – and thinks this should be part of the business case for the project. It recommends including building control officers.

Developers: incentivisation and capacity building

- Developers will be incentivised to apply the Guidance if they are provided with ongoing support, rather than being left to apply the Guidance in isolation.
- The panel recommends trialling the Guidance with developers – with support to help them design and implement schemes using the Guidance. For example, Garden Town Officers could undertake capacity building with developers to demonstrate new technologies such as heat pumps.
- The panel also recommends considering how applicants can be incentivised to apply the Guidance, through accelerated planning application management.

Zero carbon

- It will be important to be clear about what is meant by ‘zero carbon’. The panel suggests further work to define this, and points to UKGBC work providing a framework definition. It suggests augmenting the glossary at page 2 to provide a fuller definition – which could illustrate the approach for achieving ‘zero carbon’ diagrammatically.
- In respect of operational energy, the panel recommends setting a heating target, not just an overarching operational target. It highlights that factors such as occupancy can significantly change the amount of energy being used, so it is important to set a heating target.



- Reporting requirements should be made clear, particularly if zero carbon is being targeted. UKGBC guidance includes minimum reporting requirements summarised in template documents specifying how the scheme should be quantified.

Testing

- It will be important to sense check what is being asked of developers, including by testing the Guidance with them.
- The panel points to examples of design teams testing undertaken when developing Design Codes – testing design options against proposed Codes, to establish whether these are sufficiently robust. i.e. whether they can be ‘broken’.

Document structure

- The panel applauds document layout, and thinks it is already a clearly legible document. It likes the consistent layout adopted across the document.
- It supports the document’s digital interactivity – including interactive Table of Contents and Index.

Energy efficiency and carbon reduction (p.14)

- The panel questions if best practice energy efficiency standards should be higher and recommends being clearer about minimum requirements in order to achieve zero carbon, where this is targeted.

Climate change – domestic and non-domestic (p.16 & 18)

- The panel is unclear about the intent of the climate change sections. These sections refer to carbon reduction rather than climate adaption or resilience to climate change. If these sections are about carbon reduction, it recommends refinements and relabelling.
- Guidance aimed at climate adaption / resilience, such as flood risk management, overheating and microclimatic analysis, could be drawn into a separate section.

Renewable energy (p.20)

- The panel recommends adjusting the hierarchy of renewable / low-carbon technologies. For example, connected CHP is shown as a ‘satisfactory requirement’ within the submission checklist, whereas emerging policy documents are already removing references to gas fired CHP.



- The panel recommends placing heat pumps at the top of the hierarchy – and recommends explaining the case for heat pump technology as the preferable option. Heat pump technology will become increasingly important, particularly in the lead-up to 2025 – when gas heating in new homes will be banned.
- The panel does not think hydrogen or biogas will be a feasible, scalable alternatives. It also explains that solar photovoltaic and solar thermal technologies will not be sufficient to meet energy needs – placing additional onus on heat pump technology and building fabric efficiency.
- The panel recommends adding guidance on energy storage in respect of solar photovoltaics.

Construction quality (p.32)

- The panel supports how the Guidance emphasises the importance of a ‘fabric-first approach’ in the Design Principles section upfront. However, it thinks fabric performance should then be given much greater emphasis when detailing requirements – including setting minimum requirements.
- It recommends revisiting the circular economy references and providing clearer about guidance about what is being asked here. It however cautions that there is a need to be proportionate in respect of circular economy minimum requirements. It notes that there are significant cost implications, potentially increasing costs by 30 – 35%.
- Guidance could be provided in this section on post-commissioning processes and post-occupancy evaluations.

Combined checklist (p.34)

- The panel supports inclusion of the Combined Checklist. It recommends the team test the checklist, and requirements throughout, by assessing current schemes, at pre-application or post-submission stage.

Socio-economic sustainability (p.40)

- Socio-economic sustainability will be driven by understanding the critical strategic moves that are needed – to articulate local needs. Work undertaken on other strategic documents could start to form a list of key local assets and infrastructure requiring enhancement, for example cycle route improvements identified through strategic transport work. These should then form a framework for guidance on social value.
- The socio-economic section would also benefit from further work on social indicators.



- The panel points to community building precedents such as those on the Queen Elizabeth Olympic Park – where significant work has been undertaken building community spirit to support new neighbourhoods.

Omissions

- The panel recommends refinements and additional work on: waste, including food waste and other operational waste; logistics and deliveries; and cycling infrastructure.
- It recommends a joined-up approach to waste and logistics. For example, considering how storage and waste associated with deliveries such as Amazon could be centrally coordinated and managed.

Next steps

The panel strongly supports the work undertaken on the Sustainability Guidance. It would like to know how this work is influencing the Garden Town's strategic sites, including existing schemes already submitted as planning applications.



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Section 1: Identifying details

Your function, service area and team: **Planning Directorate**

If you are submitting this EqlA on behalf of another function, service area or team, specify the originating function, service area or team: **N/A**

Title of policy or decision: **Endorsement for Public Consultation: Draft HGGT Sustainability Guidance and Checklist and Draft EFDC Sustainability Guidance documents (Major Developments and Minor Developments)**

Officer completing the EqlA: **Ione Braddick** Email: **ibraddick@eppingforestdc.gov.uk**

Date of completing the assessment: **04 September 2020**

Section 2: Policy to be analysed

2.1	Is this a new policy (or decision) or a change to an existing policy, practice or project? No
2.2	<p>Describe the main aims, objectives and purpose of the policy (or decision):</p> <p>This draft HGGT Sustainability Guidance and Checklist will provide practical and technical guidance in relation to sustainability indicators and policies (environmental, social, and economic) to be applied to new strategic developments in the Garden Town.</p> <p>What outcome(s) are you hoping to achieve (ie decommissioning or commissioning a service)?</p> <p>To ensure members are fully briefed on the requirement for a HGGT Sustainability Guidance and Checklist and agreement that the draft Guidance and Checklist can be approved for public consultation</p>
2.3	<p>Does or will the policy or decision affect:</p> <ul style="list-style-type: none"> • service users • employees • the wider community or groups of people, particularly where there are areas of known inequalities? <p>The report is to provide an overview of the Draft HGGT Sustainability Guidance and EFDC Sustainability Guidance documents (Major Developments and Minor Developments) to be approved for public consultation – they are guidance documents to support policies in the emerging Local Plan and the principles and indicators in the Harlow and</p>

	<p>Gilston Garden Vision, in relation to sustainability and high-quality design. The intention is for the Sustainability Guidance documents to return to Cabinet following public consultation and be approved as a material consideration in the development management and implementation process.</p> <p>This decision will not affect any group at this stage as it is being recommended that the draft guidance documents should be subject to consultation</p> <p>Will the policy or decision influence how organisations operate?</p> <p>Following consultation if the guidance documents are agreed then the guidance and checklists will be used to determine planning applications within the District and within the Harlow and Gilston Garden Town.</p>
2.4	<p>Will the policy or decision involve substantial changes in resources?</p> <p>No</p>
2.5	<p>Is this policy or decision associated with any of the Council's other policies and how, if applicable, does the proposed policy support corporate outcomes?</p> <p>The work being undertaken is required to support policies in the emerging Local Plan in relation to sustainability, high quality design and social equity. If endorsed to be a material planning consideration, the guidance documents will inform development management and implementation processes to ensure delivery of high-quality and sustainable growth in the District and within the Harlow and Gilston Garden Town.</p>

Section 3: Evidence/data about the user population and consultation¹

As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, eg service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).

3.1	<p>What does the information tell you about those groups identified? The current position affects the District as a whole.</p>
3.2	<p>Have you consulted or involved those groups that are likely to be affected by the policy or decision you want to implement? If so, what were their views and how have their views influenced your decision?</p> <p>Early engagement on the draft EFDC Sustainability Guidance has been taking place in part alongside engagement for the HGGT Sustainability Guidance, upon which the EFDC documents are based. There has been extensive input from officers from all HGGT partner authorities into the draft HGGT Sustainability Guidance and Checklist, with a number of rounds of engagement across various services and departments in order to create a holistic and agreed guidance and checklists questions on a broad range of topics. This has included whole-document reviews as well as specific topic-focused workshops with relevant officers. External sustainability expertise has also been sought via the HGGT Quality Review Panel and UK Green Building Council.</p> <p>The Council has and will continue to conduct workshops specifically with EFDC officers and Members for the EFDC Sustainability Guidance documents. Informal engagement has been undertaken with the EFDC Leadership team, Local Plan Implementation Forum and officers across different service departments including Planning, Housing, Community, Culture and Wellbeing, Technical and Regulatory Services, and Economic Development.</p> <p>Members have been engaged on the draft Sustainability Guidance, to provide early comments and queries in order to shape the documents. Two All-Member HGGT briefing and workshop sessions were held on 27th July 2020 and 26th August 2020, with another EFDC Member workshop held on 21st September 2020. Further engagement with members is scheduled in October and during the public consultation period in November/ December.</p>
3.3	<p>If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary:</p>

In accordance with the Council's Statement of Community Involvement (SCI), the Council is required to consult stakeholders and the general public on the draft Sustainability Guidance. The proposed period of consultation in line with the SCI is six weeks. All those on the Council's planning policy database will be notified, information including the documents, an online survey/questionnaire and potential video content explaining the document will be made available on the Council's website and by notification to statutory consultees.

Public Consultation on the draft HGGT Sustainability Guidance and Checklist and the draft EFDC Sustainability Guidance documents will take place over a six week period from October – December 2020. Given current restrictions on in-person engagement due to COVID-19, we will focus on reaching a broad audience primarily through digital and, where possible, non-digital means. The consultation will seek to include:

Digital engagement:

- HGGT Sustainability Guidance and Checklist and pre-recorded and accessible overview video available for viewing on HGGT website, with links to this from partner authority websites.
- EFDC Sustainability Guidance documents available for viewing on EFDC website.
- Digital questionnaire / survey available for viewing and completing on HGGT website and Council Websites.
- Staffed online webinars and Q&A for particular stakeholder groups (e.g. Local residents and Community Groups, Developers, Members, Youth Councils, Partner Officers)
- Social Media awareness campaign (via HGGT, partner authorities and EFDC Comms Team).
- Notification of consultation via LPA Planning Policy databases and statutory consultees.

Non-digital engagement:

- Postal/ leaflet/ poster information to provide link/ QR Code to online document, and to provide hard copies of questionnaire/ survey where possible.
- A COVID-19 secure staffed event, with a small number of hard copies of the document and survey available for review and completion, if this is considered safe to do so.

Consultation arrangements will be put in place over the coming month and will be advertised ahead of the consultation, in accordance with the Statement of Community Involvement.

The intention is to simultaneously consult publicly on the HGGT Sustainability Guidance and Checklists, the EFDC Sustainability Guidance documents (Major Developments and Minor Developments), and also the HGGT Healthy Town Framework (approved for consultation by the Council's Cabinet in March 2020). Therefore, particular attention will be given to explaining these separate documents, their purpose, use and audience, and where they align or diverge.

Following the consultation, the responses will be collated and where appropriate amendments made to the documents. The HGGT Sustainability Guidance and Checklists, and the EFDC Sustainability Guidance documents (Major Developments and Minor Developments) will then return to Cabinet for formal endorsement as material planning considerations.

Section 4: Impact of policy or decision

Use this section to assess any potential impact on equality groups based on what you now know.

Description of impact	Nature of impact Positive, neutral, adverse (explain why)	Extent of impact Low, medium, high (use L, M or H)
Age	Adverse – potential for restrictions due to COVID-19 to make non-digital engagement more difficult, with potential for this to affect consultation with age groups (possibly children and the elderly) who are less digitally enabled.	M
Disability	Adverse – potential for restrictions due to COVID-19 to make non-digital engagement more difficult, with potential for this to affect consultation with those with disabilities that affect their ability to engage digitally enabled.	M
Gender	Neutral – no impact	L
Gender reassignment	Neutral – no impact	L
Marriage/civil partnership	Neutral – no impact	L
Pregnancy/maternity	Neutral – no impact	L
Race	Neutral – no impact	L
Religion/belief	Neutral – no impact	L
Sexual orientation	Neutral – no impact	L

Section 5: Conclusion

		Tick Yes/No as appropriate	
5.1	Does the EqlA in Section 4 indicate that the policy or decision would have a medium or high adverse impact on one or more equality groups?	No <input type="checkbox"/>	
		Yes <input checked="" type="checkbox"/>	If ' YES ', use the action plan at Section 6 to describe the adverse impacts and what mitigating actions you could put in place.

Section 6: Action plan to address and monitor adverse impacts

What are the potential adverse impacts?	What are the mitigating actions?	Date they will be achieved.
Adverse – potential for restrictions due to COVID-19 to make non-digital engagement more difficult, with potential for this to affect consultation with age groups (possibly children and the elderly) who are less digitally enabled.	Utilise forums such as the authority’s Youth Council(s) to engage younger audience and seek to hold a non-digital staffed event or drop in which is COVID-19 secure. Advertise consultation in non-digital manner (through Town and Parish Council magazine, posters/ leaflets). Ensure that online material is accessible for all and easy to read and feedback and questionnaires are simple to understand and complete.	Oct - Nov 2020
Adverse – potential for restrictions due to COVID-19 to make non-digital engagement more difficult, with potential for this to affect consultation with those with disabilities that affect their ability to engage digitally enabled.	Seek to hold a non-digital staffed event or drop in which is COVID-19 secure. Advertise consultation in non-digital manner (through Town and Parish Council magazine, posters/ leaflets). Ensure that online material is accessible for all and easy to read and feedback and questionnaires are simple to understand and complete. This will include captioning any video material.	Oct - Nov 2020

Section 7: Sign off

**I confirm that this initial analysis has been completed appropriately.
(A typed signature is sufficient.)**

Signature of Head of Service: Alison Blom-Cooper

Date: 04 September 2020

Signature of person completing the EqlA: Ione Braddick

Date: 04 September 2020

Advice

Keep your director informed of all equality & diversity issues. We recommend that you forward a copy of every EqlA you undertake to the director responsible for the service area. Retain a copy of this EqlA for your records. If this EqlA relates to a continuing project, ensure this document is kept under review and updated, eg after a consultation has been undertaken.

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