

Commenter	Commenting on	Respondent	Date received	Comment	Section	Saved email	EFDC Response
Statutory	Draft v3 (consultation version)	TfL	10/01/2022	Thank you for consulting Transport for London (TfL). I can confirm that we have no comments on the draft guidance.	General	Z:\Planning and Economic Dev/Policy and Conservation/Forward Planning/T. Local Plan Implementation/T.24 Sustainability Guidance/Volume 3 Consultation/Consultation Responses/TfL	No comment
Statutory	Draft v3 (consultation version)	Historic Environment Essex	13/01/2022	Thank you for consulting the Historic Environment advisors to Epping. Certain aspects of the proposed sustainable alterations/additions can have the potential to impact archaeological deposits or sites. It is recommended that similarly to the historic building section (02) the document would benefit from having a section on archaeological impacts which could be included within the submission checklist after 2 and could read: "Are you working within an area of archaeological potential?" For information on archaeology and heritage, refer to: Essex Historic Environment Record (Historic Environment Records / Place Services) or Epping Forest Historic Environment Consultant	Checklist	Z:\Planning and Economic Dev/Policy and Conservation/Forward Planning/T. Local Plan Implementation/T.24 Sustainability Guidance/Volume 3 Consultation/Consultation Responses/Historic Environment Essex	The additional references on useful guidance / documentation on refurbishment and heritage assets is useful and will be incorporated in the final draft of the Sustainability Guidance.
Statutory	Draft v3 (consultation version)	Affinity Water	26/01/2022	Section 9 of the above document is welcomed, focusing on tools for water management within residential properties and extensions. Being within a water stressed area, it is essential that during refurbishments and extensions of residential properties, water efficient fixtures and fittings are considered and integrated into designs and retained thereafter. Incorporating measures such as rainwater harvesting and grey water recycling helps the environment by reducing pressure for abstractions. They also minimise potable water use by reducing the amount of potable water used for washing, cleaning and watering gardens. This in turn reduces the carbon emissions associated with treating this water to a standard suitable for drinking and will help in our efforts to get emissions down in the borough.	Design Principles	Z:\Planning and Economic Dev/Policy and Conservation/Forward Planning/T. Local Plan Implementation/T.24 Sustainability Guidance/Volume 3 Consultation/Consultation Responses/Affinity Water	No comment
Statutory	Draft v3 (consultation version)	Natural England	02/02/2022	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England does not consider that this Sustainability Guidance Volume 3: Extensions & Refurbishments Consultation poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation. The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.	General	Z:\Planning and Economic Dev/Policy and Conservation/Forward Planning/T. Local Plan Implementation/T.24 Sustainability Guidance/Volume 3 Consultation/Consultation Responses/Natural England	No comment
Member of Parish Council	Draft v3 (consultation version)	Clir Elizabeth Burn (Theydon Bos Parish Council)	03/02/2022	*A fellow councillor who is a builder mentioned: It's good to put it as a planning condition but when it's under permitted development rights it is not possible to do it unless it's in the building regulations. *enforcement – not always enforceable *One of the councillors wanted to compliment on the way it is written and that it's very clear guidance to the man in the street thinking to do renovations but as councillors we were concerned about how much weight it could be afforded. Need to do a bit more than encouraging people to look at it. *Quails – would expect the council to follow its own guidance. Use the sites as something to publicise when they get underway to encourage them to incorporate this which in turn gives an example of something that the council is involved in. *The EFDC website is not the easiest to negotiate and it doesn't quite engage they way it used to. *Some years ago, on the old EFDC that did come out and the government was behind it was a leaflet on paving driveways. In our village we've seen the need to put more vehicles and most people in Theydon Bos have 2/3 cars. We've had yellow lines put down because of commuters and people began to pave over their front driveways, some of those are literally just paved. Our village design statement that we delivered to EFDC in 2012 talked about encouraging biodiversity in the front garden areas and we also talked about leaving areas of planting for run-off/drainage. Unfortunately, there was a loophole in the PDR although you are not supposed to put more than 5m2 of hardstanding in your garden and you don't see anyone knocking on your door if you do. The leaflet gave some ideas on planting and would like to see some illustrations in the guidance on things you could do. That sort of little encouragement makes a difference. *Rural Preservation Society & various Residents Associations who could be interested. Think about the groups to email about it and get these people involved in the workshops. Clir Neville would probably like to speak on this when it's adopted. These are the people need to take the message out there.	General, Design Principles	Z:\Planning and Economic Dev/Policy and Conservation/Forward Planning/T. Local Plan Implementation/T.24 Sustainability Guidance/Volume 3 Consultation/Consultation Responses/Public ORA	All comments noted and to be taken in to consideration for the next draft. Response to specific points below; - The Sustainability Guidance is regarded as a working tool for discussions and prompts during pre-app conversations, a next practice guide as well as an assessment tool. It refers to relevant Local Plan policies but is not in itself a policy document and does not set legal requirements. Each development will be assessed relative to its scale, contributions, merit etc. Once approved by Cabinet the guidance document will have major planning weight. It's purpose is to provide a stepping stone for where The Council expects policy to go over the next few years in relation to sustainability. - The suggestion to include information on ensuring biodiversity in paved areas of gardens is useful and will be incorporated in the 'landscaped-led design' section of the guidance.
Member of the Public	Draft v3 (consultation version)	Christine Fuchs-Khahar	03/02/2022	1) Some points that could be added to the section 'design principles': a) Landscape led design: use permeable grid paving stones that let grass grow between and let water soak into the ground to energy efficiency: think of replacing gas energy sources with boilers/boilers etc that will be compatible with switching to hydrogen, because hydrogen will replace gas in the not too distant future c) renewable technology: think of using batteries that store surplus energy from solar panels and other renewable energy sources - maybe instead of for each single dwelling for a whole street (battery manufacture being detrimental to the environment) d) fabric- first: think of installing triple glazed windows for insulation e) materials-finishes: think of using light colours for walls, roofs and even street surfaces 2) Incentives: a) When promoting incentives, most people, especially those not so interested and/or committed to environmental protection and sustainability, will be persuaded by the aspects of cost benefits, also building regulations that enforce environmental standards. These aspects need to be highlighted. b) Funding: of the three websites listed, one (Green Homes Grant) is closed to new applications, another (ecoFlex) is only available for people on low income, and a third (Domestic Renewable Heat Incentive) only applies to replacement with more sustainable heating facilities. Ergo, there is very little funding, if any, available.	Incentives, Design Principles	Z:\Planning and Economic Dev/Policy and Conservation/Forward Planning/T. Local Plan Implementation/T.24 Sustainability Guidance/Volume 3 Consultation/Consultation Responses/Christine Fuchs-Khahar	All comments noted and to be taken in to consideration for the next draft. Response to specific points below; - The suggestion to include information on ensuring biodiversity in paved areas of gardens is useful and will be incorporated in the 'landscaped-led design' section of the guidance. - Note about the rise of hydrogen boilers will be included - list of funding options will be reviewed to ensure all still relevant
Member of the Public	Draft v3 (consultation version)	Christine Fuchs-Khahar	03/02/2022	Questions: a) Will the guidance remain a mere guidance document, with advisory character, leading to optional implementation of its suggestions - or can its principles be enforced by EFDC? I.e., that the principles listed are made a condition for planning approval? b) How will this guidance be disseminated to homeowners? The guidance document is well designed and written clearly and should/could serve as information for homeowners. c) Is the checklist at the end of the document merely optional or will it actually be used as part of the planning process?	General	Z:\Planning and Economic Dev/Policy and Conservation/Forward Planning/T. Local Plan Implementation/T.24 Sustainability Guidance/Volume 3 Consultation/Consultation Responses/Christine Fuchs-Khahar	The Sustainability Guidance is regarded as a working tool for discussions and prompts during pre-app conversations, a next practice guide as well as an assessment tool. It refers to relevant Local Plan policies but is not in itself a policy document and does not set legal requirements. Each development will be assessed relative to its scale, contributions, merit etc. Once approved by Cabinet the guidance document will have major planning weight. It's purpose is to provide a stepping stone for where The Council expects policy to go over the next few years in relation to sustainability. - Once approved and endorsed by the EFDC Cabinet as a material planning consideration, the Checklist will become a requirement for every planning application of work to an existing dwelling
Statutory	Draft v3 (consultation version)	Epping Society	10/02/2022	As summarised by EFDC Officer: - The document's language should be more direct in terms of requirement and enforcement otherwise risks being dismissed by developers. - As an example, as noted on page 8 - the "Checklist should accompany a planning application". Will the application be refused or returned if it does not? Can Council not at the very least make the Checklist an essential requirement of an application? - The foot note on page 32 - "ensure published design standards". We read this hopefully, that there will be at least some requirement for building designs to move in the right direction; but we think that stakeholders might appreciate more detail here. - Epping Society are happy to support the aims of the document. The concepts and technologies included are generally accepted as those likely to move our community in the right sense environmentally and make homes more pleasant to live in. - Owners, architects, developers and builders should be expected to demonstrate that they have considered refurbishment, rather than demolition. - Solar orientation East-West (page 19). Will this be applied also to new buildings? - Not overshadowing neighbours. This is a problem frequently raised by residents looking at proposed extensions, garden rooms and new builds. The Epping Society is pleased to see it included here; is this evidence that it is to be given more credence in Planning Application considerations than in the recent past? - Materials – should include reference to fire safety? - Installing charging points for Electric vehicles. Given the crucial importance of this for air pollution, the forest, a number of EFDC policies and the Soundness of the Local Plan; some reference could have been made – for example, that where an extension is on a driveway or front garden, consideration should be given to installing such. - One technology, grey water systems, is very cheap to install in new build and much more expensive to retrofit. Ongoing and maintenance costs are trivial. Our part of the UK is facing increasing water supply stress, while several parts of the town of Epping already experience low pressure at times, and the developments under the Local Plan will exacerbate this. This might be one technology which the Council could consider making compulsory? - We would have hoped to see some "future-proofing" in the Guidance – as examples, there is an emerging emphasis on insulation, also new energy sources are evolving. One would have hoped to see opportunities left open to include as yet unforeseen technologies. A "keep under review and amend" paragraph might do be included?	General, Design Principles, Checklist	Z:\Planning and Economic Dev/Policy and Conservation/Forward Planning/T. Local Plan Implementation/T.24 Sustainability Guidance/Volume 3 Consultation/Consultation Responses/Epping Society	All comments noted and to be taken in to consideration for the next draft. Response to specific points below; - The Sustainability Guidance is regarded as a working tool for discussions and prompts during pre-app conversations, a next practice guide as well as an assessment tool. It refers to relevant Local Plan policies but is not in itself a policy document and does not set legal requirements. Each development will be assessed relative to its scale, contributions, merit etc. Once approved by Cabinet the guidance document will have major planning weight. It's purpose is to provide a stepping stone for where The Council expects policy to go over the next few years in relation to sustainability. - The emphasis on refurbishment where possible over demolition will be communicated in the guidance. - The "Review and Monitor" section within the guidance's introduction makes note of changing standards and the need to evolve guidelines, and also makes note of the commitment to review the update the document once every 3 years.
Statutory	Draft v3 (consultation version)	Historic England	18/02/2022	While references and links in the guidance and checklist to the relevant Historic England guidance publications on energy efficiency in older houses and historic buildings are welcomed, it may be helpful if these were referenced at the relevant sections within the guidance note rather than deferring them to the checklist. In developing the guidance note you may find the following further guidance to be helpful in understanding the special considerations for historic buildings. The Sustainable Traditional Buildings Alliance (STBA), in association with Historic England, has published practical guidance on retrofitting traditional buildings, based on current research and practice. 'Planning Responsible Retrofit of Traditional Buildings' can be accessed via: https://historicengland.org.uk/images-books/publications/planning-responsible-retrofit-of-traditional-buildings/	Design Principles	Z:\Planning and Economic Dev/Policy and Conservation/Forward Planning/T. Local Plan Implementation/T.24 Sustainability Guidance/Volume 3 Consultation/Consultation Responses/Historic England	Comments noted and reference to further guidance will be included in the next draft.
Statutory	Draft v3 (consultation version)	Canal River Trust	18/02/2022	Based on the information available we have the following general advice: but under 6m of the River Lea passes through the Epping Forest District Council area and the waterways have the potential to be used for heating and cooling. There may well also be other sources of thermal energy available to residents via boreholes and aquifers. Section 4 Renewable Energy should therefore for the sake of completeness include Water Source Heat Pumps (WSHPs), which are the most efficient type of heat pump and can use water from a variety of sources – such as rivers, lakes and boreholes. Single households and District Heat Networks can benefit from the use of WSHPs providing cost-effective energy solutions to occupants, that should be price stable, secure and sustainable.	Design Principles	Z:\Planning and Economic Dev/Policy and Conservation/Forward Planning/T. Local Plan Implementation/T.24 Sustainability Guidance/Volume 3 Consultation/Consultation Responses/Canal River Trust	Comments noted and reference to water source heat pumps+HS will be included in the next draft.

Statutory	Draft v3 (consultation version)	Loughton Town Council	21/02/2022	<p>As summarised by EFDC Officer: 1 There is a propensity for planning applications and alterations to include large expanses of glass, in doors and windows. This is concerning because:</p> <p>A) Large glass windows, doors and skylights cause large amounts of light to pollute the surrounding area. This is detrimental to the health and wellbeing of neighbours.</p> <p>B) Large expanses of glass allow more sunlight in to heat up a property. In Summer this causes overheating, which then requires air conditioning for cooling.</p> <p>The solution to all the above, is...</p> <p>Keep or revert to smaller windows. This will keep the property at a more even temperature. Light pollution will be reduced/not an issue. This in turn will stop all the many problems caused by light pollution, listed in point A) from occurring. Air conditioning units should be avoided whenever possible</p> <p>Large glass windows/doors should only be installed as a last resort. To also make sure there is no light pollution, suitable blinds should be used to stop the escape of light into the wider environment, at dusk and throughout the night. To control the internal temperature during the day a light screening / shading method such as canopies, shades etc should routinely be used.</p> <p>2 Trees/Hedges - Green Screening</p> <p>3 Grass and natural Planting - The removal of natural grass and replacing with plastic grass is detrimental to the natural environment.</p> <p>All properties in the UK have an EPC rating. There should be a way of showing the increased carbon emission due to the loss of garden area, lighting, heating etc when an extension is planned. The EFDC or central government should provide ways to calculate this per square metre. A planning application should also include carbon neutral activities incorporated - such as heat pump, solar panels, rainwater harvesting, additional trees and shrubs planted etc. This may include reduction in the number of cars used by the occupants and the use of electric cars/ bicycles. A user-friendly chart to work out the increased carbon emission/mitigation efforts should be made available and a give a final projected EPC. Finally, whilst members applaud such guidance, taking into consideration the limited resources of EFDC, it was questioned who and what enforcement action would be taken to hold applicants accountable?</p>	Design Principles	2:\Planning and Economic Dev\Policy and Conservation\Forward Planning\T. Local Plan Implementation\T.24 Sustainability Guidance\Volume 3 Consultation\Consultation Responses\Loughton Town Council	All comments noted and to be taken in to consideration for the next draft.
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Statutory	Draft v3 (consultation version)	Theydon Bois Parish Council	21/02/2022	<p>As summarised by EFDC Officer:</p> <p>In summary of our discussions, at Parish level, we would like to comment on the clarity, and accessibility, of the advice offered, which has been clearly written and annotated. However, some concern was raised, as was reflected in the Q&A Session from those participants, as to the extent to which this Guidance may, or may not, be applied to developments which do not require the submission of Full Planning applications (ie. those undertaken by permitted development) or those which may not be governed by Building Regulations.</p> <p>Secondly, some concern was raised that certain forms of modernisation, and refurbishment, may prove expensive to implement, and Government grants are not always offered over an extended period of time. Some updating of the Guidance may also be needed, from time to time, in order to ensure that any currently-available grant award schemes are open, and actively, publicised and promoted.</p> <p>Thirdly, I had mentioned an earlier document which, at one time, was featured on the Epping Forest District Council ('EFDC') website, in relation to hardstandings, primarily on the frontages of properties where they are intended for off-street parking. This dates back to Government Guidance offered in September 2008, but there is a correlation with Schedule 2, Part 1, Class F of the General Permitted Development Order, 2015, in relation to hard surfaces and drainage. The current 'Sustainability Guidance No.3' would seem to be an excellent opportunity to incorporate some of the recommendations of this earlier Guidance, and to consider both the layout and planting of such areas, so adding positively to sustainable drainage systems, biodiversity and the visual amenity of our residential areas.</p> <p>Fourthly, as no District Councillors were present at the Q&A Session, perhaps further Workshops could be scheduled to encourage their attendance, particularly as a number of Members have, in recent years, expressed interest in the topic of Sustainability and Climate Change, and some are believed to contribute to the Interim Air Pollution Mitigation Strategy Panel, which, we understand, has been formed to provide support, constructive input and guidance to the Planning Portfolio Holder. Finally, given the formation of EFDC's new commercial entity, Quails, it was suggested that future developments undertaken by this entity (and, in particular, those anticipated within Epping town), and the refurbishment of council-owned Housing Association properties within the District, should be considered as an opportunity to showcase some of the elements of the suggested Sustainability Guidance (Parts 1, 2 and 3).</p>	Design Principles	2:\Planning and Economic Dev\Policy and Conservation\Forward Planning\T. Local Plan Implementation\T.24 Sustainability Guidance\Volume 3 Consultation\Consultation Responses\Theydon Bois Parish Council	All comments noted and to be taken in to consideration for the next draft. Responses to specific points below:
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- The Sustainability Guidance is regarded as a working tool for discussions and prompts during pre-app conversations, a next practice guide as well as an assessment tool. It refers to relevant Local Plan policies but is not in itself a policy document and does not set legal requirements. Each development will be assessed relative to its scale, contributions, merit etc. Once approved by Cabinet the guidance document will have major planning weight. It's purpose is to provide a stepping stone for where The Council expects policy to go over the next few years in relation to sustainability.
- The suggestion to include information on ensuring biodiversity in paved areas of gardens is useful and will be incorporated in the 'landscape-led design' section of the guidance.