

## **D9 – Impact of Overheating**

- Support - 10
- Neither support of object - 3
- Object - 7

The changes to the supporting text and the Local Plan policies have not only been informed by the responses to the Regulation 18 consultation but they have also taken on board any additional feedback that has come out of discussions/meetings with statutory consultees and members in order to improve the clarity and understanding of the contents of the Local Plan.

<b>Comments in support of D9 – impact of overheating</b>		
<b>Respondent number</b>	<b>Comment</b>	<b>Officer comment</b>
ANON-KSAR-N85J-P	The proposed measures included in the policy are supported, but it should be acknowledged that these issues will be addressed in the recently implemented Part O of the Building Regulations which will require assessment of overheating risk as part of a Building Control submission. It would be worthwhile encouraging applicants to consider Part O prior to submitting a planning application to avoid being caught out by these requirements once permission has been granted.	Comments are noted. On balance it is considered the reference to Building Regulations may cause unintended confusion, as they is subject to review outside of the planning system and may be updated and amended or may not be applicable in the same way as planning policy.
ANON-KSAR-N8Q5-W	Strongly support the section ii) recognising the positive role of trees in addressing over heating.  In support of this policy and other associate climate policies, we recommend setting a target for tree canopy cover on development sites, ideally of 30 per cent, and of at least 20 per cent, to be pursued through the retention of important trees, appropriate replacement of trees lost through	The sentiment is appreciated but it is not clear how the suggested targets are derived or if they could be justified.

	development, ageing or disease and by new planting to support green infrastructure.	
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<b>Comments which neither support nor object to D9 – impact of overheating</b>		
<b>Respondent number</b>	<b>Comment</b>	<b>Officer comment</b>
BHLF- KSAR- N8BF-Y	For consistency with other policies of the plan, including on density, the policy should be clarified such that avoiding over heating is one of many design matters to be considered and that an appropriate design solution for the context of the site is the objective.	<p>Agreed. Wording of Policy D1 amended to reflect this.</p> <p><b>Recommended Response:</b></p> <p>Amend Policy D1 to read as follows:</p> <p>ix. Measures to minimise carbon emissions, <del>utilise passive solar gain</del> <u>considering the potential for both passive solar gain and overheating and promoting the inclusion of...</u></p>

<b>Comments which object to D9 – impact of overheating</b>		
<b>Respondent number</b>	<b>Comment</b>	<b>Officer comment</b>

ANON-KSAR-NKJV-A	<p>The requirements set out in Policy D9 arise from climate change. It is suggested that consideration be given to its deletion, and if absolutely necessary incorporating its requirements into Policy CN1. There is no need for a separate policy on this basis, particularly as this is a matter that will be controlled under Building Regulatory changes. To introduce a further planning requirement introduces unnecessary burden and expense to an already complex process.</p>	<p>Overheating should be considered from the outset of the design process and therefore it is appropriate for the Plan to set out how this should be demonstrated. However, it is agreed that it would be more concise and straightforward to include this issue in Policy CN1.</p> <p><b>Recommended Response:</b></p> <p>Delete policy and incorporate appropriate criteria into policy CN1.</p>
ANON-KSAR-N8N9-X	<p>I don't object to the principle of this policy in regard to planting of additional trees. I support more trees being planting but planting trees close to new properties could lead t future problems with root systems interfering with foundations.</p> <p>There needs to be a minimum distance between closest new trees and dwellings - in addition insurance companies will add a surcharge where trees are within x metres of a dwelling.</p> <p>Is there a specification in regard to size of trees planted as it will take 10 - 15 years for many trees to be latge enough to provide shade to a dwelling.</p>	<p>Agreed there can be issues with tree root system and foundations, and it may not always be appropriate.</p> <p><b>Recommended Response:</b></p> <p>Insert the words “as appropriate” into the policy criterion (which is proposed to be moved to Policy CN1).</p>
ANON-KSAR-N8XZ-9 Denmead Parish Council	<p>Policy D9 calls for planting trees to shade buildings – the type of trees planted by developers will be too small to shade buildings unless they are planted too close – causing problems with subsidence as the trees mature.</p>	<p>Agreed there can be issues with tree root system and foundations, and it may not always be appropriate.</p> <p><b>Recommended Response:</b></p>

		Insert the words “as appropriate” into the policy criterion (which is proposed to be moved to Policy CN1).
ANON-KSAR-N8XY-8	It is important for health the cool centres are created as places for vulnerable people to go during heatwaves. This policy should seek to identify potential locations and support their development.	The proposed action goes beyond the scope of a policy such as this.
ANON-KSAR-N81F-E	Bargate Homes suggest that for consistency with other policies of the plan, including on density, the policy should be clarified such that avoiding over heating is one of many design matters to be considered and that an appropriate design solution for the context of the site is the objective.	Agreed. Wording of Policy D1 amended to reflect this.  <b>Recommended Response:</b>  Amend Policy D1 to read as follows:  ix. Measures to minimise carbon emissions, <del>utilise passive solar gain</del> <u>considering the potential for both passive solar gain and overheating and promoting the inclusion of...</u> ”
ANON-KSAR-N85N-T	Trees for shading are a good idea, but remember that tree roots too close to buildings damage foundations.	Agreed there can be issues with tree root system and foundations, and it may not always be appropriate.  <b>Recommended Response:</b>  Insert the words “as appropriate” into the policy criterion (which is proposed to be moved to Policy CN1).
BHLF-KSAR-N86N-U	For consistency with other policies of the plan, including on density, the policy should be clarified such that avoiding over heating is one of many	Agreed. Wording of Policy D1 amended to reflect this.

	design matters to be considered and that an appropriate design solution for the context of the site is the objective.	<b>Recommended Response:</b>  Amend Policy D1 to read as follows: ix. Measures to minimise carbon emissions, <del>utilise passive solar gain</del> <u>considering the potential for both passive solar gain and overheating</u> <u>and promoting the inclusion of...</u> ”
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	<b>Recommendations</b>	<b>Officer response</b>
Comments from SA	5.80 Policy D9 presently supports the incorporation of green roofs and walls and other types of green infrastructure to help address the potential overheating of buildings. The plan could be particularly supportive of developments that incorporate these types of provisions where they can be demonstrated to provide benefits for biodiversity. Comments from HRA	These elements of the draft policy are recommended to be moved to form part of Policy CN1. That policy already contains includes consideration of biodiversity gain and as such it is considered that this recommendation in the Sustainability Appraisal is addressed.
Comments from HRA	None	None

Delete Policy. Move supporting paragraphs 5.93 to 5.96 to CN1. Delete para. 5.92. Move diagram on page 106 to CN1.

### **Policy D9 Impact of overheating**

~~Development proposals (excluding householder applications and changes of use) should address the matter of overheating in accordance with the following:~~

- ~~i. Design buildings in a way that balances temperature and ventilation throughout the year;~~
- ~~ii. Reduce the amount of heat that enters a building in the warmer months through the orientation of the building, the planting of additional trees and shading from canopy coverage, consideration of the type of vegetation and planting around the outside of the~~

~~building, green roofs and walls that are covered in vegetation, fenestration, insulation, external shutters, and the use of colour of external materials; and~~

~~iii. As a last resort, install mechanical air conditioning systems (ensuring this uses the lowest source of carbon emissions). This information should be included in an Energy and Carbon Statement that accompanies a planning application (Policy CN1).~~