

**LOCAL PLAN REVIEW DEVELOPMENT STRATEGY OPTIONS AND POLICY OPTIONS -
JANUARY TO MARCH 2022**

SUMMARY OF RESPONSES TO Q22

Question 22 – Do you agree with the preferred policy approach for overheating? If not, why not?

A summary of the comments received are set out below:

Comment	NWL Officer Response
Multi-functional Green Infrastructure (GI) and SuDS have an important role in preventing overheating. Design elements such as street trees and open swales can have a significant impact on overheating whilst providing a plethora of other biodiversity, wellbeing and amenity benefits. These GI/SuDS elements could be included within any checklists for developments to demonstrate that the risk of overheating has been considered.	These comments are noted.
Support the proposal for specific requirements to address 'Embodied Carbon' through life cycle carbon assessments. The proposals in Option 3, which are supported, represent a useful step forward from the existing rather general Local Plan policy that "new development should have regard to sustainable design and construction methods".	These comments are noted.
It is recognised that real estate is a significant contributor to carbon emissions through the construction and operation of buildings. In setting policy on sustainable design, given the rapidly changing technologies and approaches, it is important to avoid policy wording that is too inflexible or could conflict with government legislation and building regulations.	These comments are noted.
The need to address climate change is being addressed on a co-ordinated and industry wide basis through Building Regulations changes, agreed targets and joint multi-agency working relationships. It is important that local planning policies do not accelerate beyond the requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF. Therefore, the requirement for applicants to submit an	Refer to paragraph 7.35 – 7.37 of the main report.

industry recognised assessment that considers overheating is not appropriate.	
The assessment is not nationally required. Paragraph 154 of the NPPF outlines that any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.	Refer to paragraph 7.35 – 7.37 of the main report.
The ability for large developments to source a certain percentage of their energy supply from on-site renewables will need to be balanced with the burden of delivering other infrastructure requirements that will be required to support the chosen spatial strategy to ensure the delivery of sustainable communities.	These comments are noted.
No evidence has been provided to suggest this has been viability tested and therefore it is unclear whether it is deliverable.	All policies will be tested as part of Local Plan Viability Assessment.
In setting planning policy on sustainable design, given the rapidly changing technologies and approaches, it is important to avoid policy wording that is too inflexible or could conflict with Government legislation and building regulations.	These comments are noted.
Suggested that Overheating Assessments remain a discretionary part of any planning applications. As part of the 5-year local plan review cycle, this could be an area of change when there is a wider range of businesses offering to complete Overheating Assessments and a greater knowledge within the LPA to interpret them.	Refer to paragraph 7.35 – 7.37 of the main report.
It is appropriate to consider building design including orientation when it comes to overheating.	These comments are noted.
The policy should retain the clause regarding technical feasibility and economic viability to ensure each scheme and any constraints can be assessed individually. The preparation of a Supplementary Planning Document would assist applicants in preparing developments and understanding the Council's requirements. Any requirements should also be tested to ensure that viability and deliverability is not adversely impacted	These comments are noted. The Levelling Up and Regeneration Bill: reforms to national planning policy consultation document states that authorities will no longer be able to prepare supplementary planning documents. It is therefore suggested that the reference to Supplementary Planning Document be deleted.
Requirement should apply to ALL developments. There seems little point in having a policy that can be evaded in smaller developments resulting in Non-compliant properties being built.	These comments are noted. The NPPF recognises the contribution small and medium sized builders can make to meeting the housing requirement of an area. However, small and medium sized

	builders do not benefit from the same level of resources as volume housebuilders therefore, requirements need to be balanced against resource levels.
The policy should specify that solutions for the overheating issue should be passive – i.e. Not installing air con.	Refer to paragraph 7.35 – 7.37 of the main report.
The policy at 9.55 is headed reducing carbon emissions, whereas overheating should address wellbeing. These issues are related, but separate. The policy does not take overheating seriously and needs to be comprehensively reassessed and rewritten.	Refer to paragraph 7.35 – 7.37 of the main report.
The approach of having a simple checklist in place for small developments to demonstrate that risk of overheating has been considered as part of the house design appears reasonable and is supported.	These comments are noted.
Support the policy approach for climate change assessment of development. Without consideration of this issue at an early stage in the planning process there is the risk that future maladaptation of new build schemes, to reduce any increase in heating that may occur, which could affect the setting of heritage assets in a way that was not taken into account at application stage.	These comments are noted.
Support the preferred policy approach as it covers both small and large developments and will become more important in the future as climate change comes into play.	These comments are noted.
Option 3 seems logical.	These comments are noted.
No strong view but would lean toward Option 2. Where are the recourses to manage this? The Mediterranean and most of the 3rd World manages without too much mollycoddling - why can't we?	These comments are noted.