

## **SUPPLEMENTARY PLANNING DOCUMENT: PLANNING FOR CLIMATE CHANGE**

### **1. RECOMMENDATIONS**

- 1.1 That the Cabinet agrees:
  - i. The draft responses to representations (attached at Annex 1 to this report);
  - ii. That the revised Supplementary Planning Document (SPD) “Planning for Climate Change” (attached at Annex 2 to this report) is formally adopted and published on the Council’s website;
  - iii. That the revised SPD is taken into account as a material consideration in the determination of all relevant applications that are submitted after the date of adoption; and
  - iv. That any final editorial changes to the document prior to publication be agreed by the Strategic Director of Place, Operations and Sustainability in consultation with the Portfolio Holder for Planning and Economy.

### **2. PURPOSE AND OBJECTIVES**

- 2.1 The purpose of this report is to seek approval to adopt the supplementary planning document (SPD) Planning for Climate Change, following public consultation and consequential changes to the document.
- 2.2 The SPD will be used in the determination of planning applications for the construction of new homes, commercial and community buildings. The SPD provides guidance on the interpretation and implementation of policies in the adopted Local Plan 2016-2036 Part 1: Planning Strategy. In particular, parts of Policies STR1: Achieving sustainable development and ENV3: Design quality and local distinctiveness. Taken together these policies require that new development is future-proofed for climate change and incorporates design measures that improve resource efficiency, climate change resilience and reduce environmental impacts.
- 2.3 The key objectives of this SPD are to encourage the development industry to take all reasonable steps to minimise expected carbon emissions when designing and constructing new buildings, and to make new development more sustainable and climate change adapted. A ‘future homes now’ commitment not to install gas or oil-fired boilers in new development is a priority objective.
- 2.4 More detailed climate change policies and standards will continue to be developed through the Local Plan Review, and/or as national policy evolves.

### **3. NATIONAL AND CORPORATE CONTEXT**

- 3.1 On 11 October 2021 New Forest District Council declared a Climate and Nature Emergency. The Climate and Nature Emergency declaration reflects the Climate

Change Act 2008 (as amended 2019), which commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels by 2050. In 2021 the UK committed a 'world leading' 78% reduction target by 2035, set out in the Climate Change Committee's Sixth Carbon Budget.

- 3.2 The Planning for Climate Change SPD sits in the context of the National Planning Policy Framework (NPPF2023). Pursuant to the Climate Change Act, this sets out that the overarching environmental objectives of the planning system include 'using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy'<sup>1</sup>.
- 3.3 This SPD is part of the wider set of actions previously agreed by the Council to deliver on the Declaration, outlined in a Climate and Nature Emergency Action Plan<sup>2</sup>. It also responds to both the Community Matters Corporate Plan 2020-2024<sup>3</sup> commitment to 'ensuring sustainability is at the centre of our decisions to preserve resources and the environment for future generations', and the emerging draft Corporate Plan 2024-2028<sup>4</sup> and its priority of 'protecting our climate, coast and natural world'.
- 3.4 The SPD focuses on new development. Taking new homes as an example, a representative 3-bed terraced house built in the last decade consumes 124 KWh of energy per square meter per annum, of which 95 KWh as gas, and emits about 2 tonnes of CO<sub>2</sub> per annum from gas consumption alone (mostly for water and space heating)<sup>5</sup>. Best practice energy efficient homes consume around 15 KWh/m<sup>2</sup>/year for heating, do not use gas (or oil) boilers, and are carbon neutral in operation if their electricity is provided from renewable or nuclear sources.
- 3.5 To put a dwelling figure in context, of the New Forest district carbon dioxide emissions that are within the scope of influence of local authorities, 25% of these emissions in 2020 arose from natural gas use - 20% from domestic heating and 5% from commercial and other uses<sup>6</sup>.
- 3.6 The SPD complements the Council's Greener Housing Strategy<sup>7</sup> which addresses decarbonising the Council's own affordable house building programme and affordable housing stock and working with private owners and landlords to help decarbonise existing homes. As part of the Greener Housing Strategy, it is intended that new affordable housing schemes designed and built by the Council will be constructed to the draft Future Homes standard<sup>8</sup>.

#### **4. THE REVISED PLANNING FOR CLIMATE CHANGE SPD DOCUMENT**

- 4.1 Consultation on the draft SPD took place between 23<sup>rd</sup> May and 11<sup>th</sup> July 2023. There were 32 respondents to the consultation which can be broadly categorised as follows:

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<sup>1</sup> NPPF paragraph 8

<sup>2</sup> [Climate change - New Forest District Council](#)

<sup>3</sup> [Corporate\\_plan\\_17.11.21.pdf \(newforest.gov.uk\)](#)

<sup>4</sup> [Corporate\\_Plan\\_2024\\_-2028\\_Consultation\\_Draft\\_Cabinet\\_1.pdf \(newforest.gov.uk\)](#)

<sup>5</sup> [Energy consumption in new domestic buildings 2015 to 2017](#), BEIS 2019, and [Greenhouse gas reporting: conversion factors](#), BEIS 2021. Based on an EPC B-rated new build home with a gas boiler in 2017, sample size 93,967 homes.

<sup>6</sup> [UK local authority and regional greenhouse gas emissions national statistics](#), 2020 data (ONS 2022)

<sup>7</sup> [Greener Housing Strategy, Item 11, Cabinet report 6 July 2022](#)

<sup>8</sup> The future Homes Standard sets out envisaged changes to the Building Regulations proposed to come into effect in 2025, including 75-80% lower CO<sub>2</sub> emissions than 2020 standards, and a proposed ban on the installation of gas boilers in new homes.

- 14 residents/individuals
  - 8 developers/planning agents/landowners
  - 3 town/parish councils
  - 3 national organisations (government agencies)
  - 3 local organisations
  - 1 utility company.
- 4.2 There were several respondents who felt that the SPD does not go far enough and more stringent standards should be rigorously imposed. Some respondents from the development industry consider that the SPD will be overly bureaucratic and an additional burden on those trying to bring forward development.
- 4.3 Whilst the SPD will provide the context for the provision of further information from developers to enable consideration of whether development will comply with policies STR1 and ENV3, members should note that it is not possible to introduce new requirements or development standards without progressing those policies through a local plan review. The SPD seeks to strike a balance between highlighting and promoting best practice and ensuring that additional burdens or costs that could make development unviable are not made requirements as a result of the content of the SPD.
- 4.4 A summary of all the representations received, with proposed responses to the matters raised is set out at Annex 1 of this report. The response to representations has informed the changes to the SPD prior to its recommended adoption.
- 4.5 The revised SPD document is attached at Annex 2. The main changes to the document are as follows.

#### Part A

- **Focus on new buildings rather than retrofit** – clarification that the focus of the SPD is on new buildings and masterplanning new development, rather than retrofitting existing buildings. The document now signposts the Council's Greener Housing Strategy and Historic England's advice on retrofitting historic buildings in its Climate Change Strategy.
- **Explaining choices in balancing competing considerations** - The document also now highlights that where there is potential conflict between the need to respect local distinctiveness or heritage issues in design terms, and the need to address climate change through design, the developer's preferred approach and its justification should be articulated in the design and access statement and the climate change statement.
- **References** - A reference to the Cranborne Chase AONB Management Plan has been added.

#### Part B

- **Scope of SPD** – clarification that the guidance on what needs to be submitted with a planning application refers to new buildings and that it is not applicable to applications for changes of use, retrofitting existing buildings or householder applications. Clarification has been added that SUDS are applicable to minor as well as major development.
- **Influence of SPD** - Text has been added to make it clear that it is unlikely that planning applications will be refused if the development fails to meet the

best practice standards set out in the SPD. It is important to note that additional standards or policy requirements cannot be added through an SPD which can only provide guidance on the implementation of adopted local plan policies STR1 and ENV3. The information provided will allow the developer to articulate their case as to how their development meets these policies.

- **Aiding applicants** - Responding to representations that the SPD will require an overly bureaucratic burden on applicants which could delay development from coming forward, the SPD has been amended to include a proforma to assist with providing relevant information in a consistent format. This will hopefully provide further clarity for applicants and reduce the prospect of insufficient information being provided in support of the application.

## Part C

- **Net Zero Carbon Toolkit** - This section is derived from the Net Zero Carbon Toolkit, updated for NFDC circumstance. There have therefore been limited changes to this section. However, text has been added to include a reference to the potential use of modern methods of construction to reduce embodied carbon on buildings. Text has also been added to reference smart controls and energy storage which enable energy to be consumed, retained and released according to specific energy demands.
- **Referencing** - References have been added to nature-based solutions in the 'Supporting ecology and biodiversity' section. The guidance in Natural England's report 'Carbon Storage and Sequestration by Habitat 2021' is signposted, as are the Partnership for South Hampshire's 'Green Infrastructure Strategy' and 'Green Infrastructure Implementation Plan'. Whilst these documents all contain information relevant to climate change mitigation and adaptation, it is considered appropriate to sign post the information rather than repeat or try to summarise it in the Climate Change SPD.

## 5. NEXT STEPS

- 5.1 After any final editing, the SPD will be published on the Council's website as both a downloadable document and also reformatted as a web-version, alongside the adoption and consultation statements. Training for planning officers and elected members will be provided.
- 5.2 Most new planning policy documents are applied to the determination of all applications from the point of adoption. However, in this case it is intended that the best practice highlighted within the SPD should inform an iterative design process and will be a particularly important aspect of pre-application discussion and advice. There would also be the need to seek further information for current applications. The specific circumstances applying to this SPD mean that it is recommended that it be applied as a material consideration to all applications submitted after the adoption of the SPD.

## 6. FINANCIAL IMPLICATIONS

- 6.1 There are no direct financial implications for the Council. However, development viability may be affected as the achievement of more energy efficient and environmentally sustainable buildings may impact on development costs whilst supply chains and processes transition to higher standards and expectations. Equally

development with lower energy running costs and improved environmental credentials is likely to be more attractive to occupiers and may command a price premium.

## **7. ENVIRONMENTAL IMPLICATIONS**

7.1 The Supplementary Planning Document sets out proposals which aim to ensure that new development:

- Reduces its impact on the environment by reducing greenhouse gas emissions that contribute to climate change; and
- Is resilient to the projected future effects of climate change on the environment.

## **8. CRIME & DISORDER, EQUALITY & DIVERSITY AND DATA PROTECTION IMPLICATIONS**

8.1 There are none.

## **9. PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL COMMENTS**

9.1 The Panel endorsed all the recommendations in the report. Members discussed how the SPD would support the current Local Plan and would act as a springboard for the development of the new Local Plan and in addressing climate matters. The Panel made comments on securing renewable energy sources by way of using solar panels in Council car parks and the issues of installation of heat pumps in existing developments, which are outside the scope of this document as it relates to new development.

## **10. PORTFOLIO HOLDER'S COMMENTS**

10.1 **Portfolio Holder for Environment and Sustainability:** The adoption of this supplementary planning document is a crucial step in addressing the climate and nature emergency in our district, recognising that new development needs to play its part in a sustainable and resilient future by reducing its carbon emissions.

10.2 **Portfolio Holder for Planning and Economy:** This document is important to encourage new development to be more sustainably designed and resilient to weather extremes in the future. This Council remains committed to working with the development industry to promote best practice in this area, whilst continuing to deliver the commitments set out in the adopted Local Plan.

### **For further information contact:**

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### **Background Papers:**

None.