



## **Consultation Statement**

### **Planning for Climate Change Supplementary Planning Document**

#### **Public Consultation on the Draft 'Planning for Climate Change' Supplementary Planning Document**

The Draft 'Planning for Climate Change' Supplementary Planning Document (SPD) was subject to a consultation period that ran from 23 May 2023 to 11 July 2023.

Together with publishing the document on the Council's website and issuing of a news release, all contacts on the Local Plan Database were notified of the consultation inviting them to comment. This includes all the bodies and groups set out in Appendix 1 of the Council's Statement of Community Involvement (October 2020).

The responses to that consultation and how they were taken into account are provided in full on the Council's website at <https://newforest.gov.uk/planningforclimatechange>

In total there were 36 respondents to the consultation:

- Local residents/individuals (16)
- Town and Parish Councils (3)
- National organisations (government agencies) (5)
- Local organisations (3)
- Developers/planning agents (8)
- Utility company (1)

The consultation asked a series of questions about the scope and contents of the draft SPD as well as allowing people to make comments more generally on a specific section, paragraph or table.

The comments received ranged from general views on the overall content and principles of the document, to both positive and negative views on more specific elements of detail on certain aspects. 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.

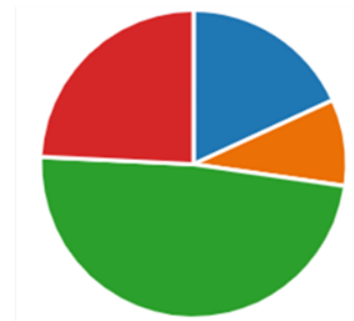
Some of comments which encouraged the SPD to go further and impose stricter standards should be addressed through the local plan review. This would be the appropriate place to introduce new policy rather than an SPD which should only explain and amplify on the application of existing adopted local plan policies.

The following is a summary of the questions asked during the consultation:

**1. The main aims of the SPD**

What are your views on the main aims of the CC SPD as summarised in paragraph 3?

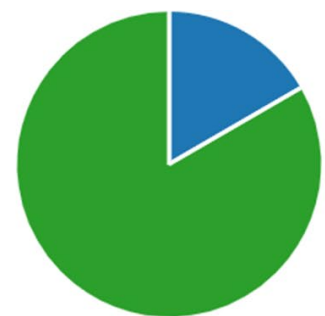
● Neutral or no opinion	5
● Goes too far	3
● About right	16
● Does not go far enough	8



**2. Benefits and costs of net zero carbon development**

Would you be prepared to pay more to rent or purchase a home or premises that had higher energy efficiency standards and that was more climate change resilient, but was otherwise of a comparable standard to current new builds?

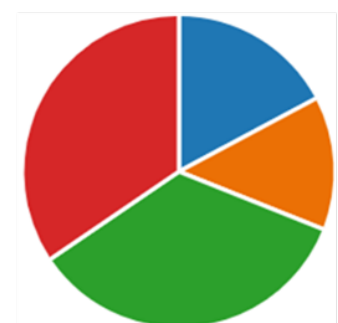
● Could not afford to pay more	3
● May be able to afford to pay m...	0
● May pay more if the standards a...	14



**3. CCS 1 - Minimising energy demand and targeting net zero carbon in operation**

What are your views on the proposed best practice objective that new buildings should be zero carbon in operation wherever possible, and at the very least future proofed to be zero carbon ready?

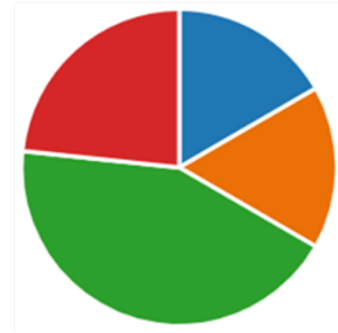
● Neutral or no opinion	5
● Goes too far	3
● About right	10
● Does not go far enough	10



**4. CCS 2 - On-site renewable energy generation**

What are your views on the proposed best practice objective that new buildings should, wherever practicable, provide sufficient renewable energy generation on-site to run the building?

Neutral or no opinion	5
Goes too far	4
About right	12
Does not go far enough	7



### 5. CCS3 – Reducing embodied carbon emissions

What are your views on the proposed interim best practice objective that developers take all practicable steps to reduce carbon embodied in construction processes?

‘Absolutely essential and the sooner the better...’

‘...this is largely outside the developer’s control...’

‘...the potential deliverability and viability of tackling embodied carbon is largely unknown’

### 6. CCS4 – Sustainable travel

What are your views on the proposed requirements to help encourage more sustainable travel?

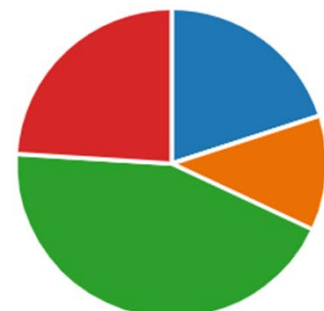
Neutral or no opinion	4
Goes too far	2
About right	9
Does not go far enough	9



### 7. CCS5 – Avoiding overheating

What are your views on the proposed best practice objective that developments are designed to enable urban cooling and to reduce overheating risks?

Neutral or no opinion	4
Goes too far	3
About right	11
Does not go far enough	6



### 8. CCS6 – Flood risk reduction and sustainable urban drainage

What are your views on the proposed best practice objective to naturally and safely manage surface water run off, including under extreme climate conditions?

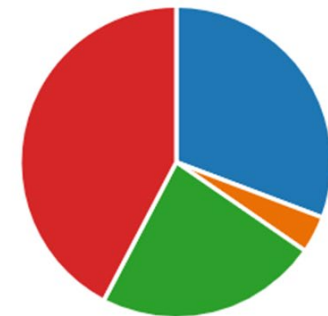
● Neutral or no opinion	4
● Goes too far	1
● About right	8
● Does not go far enough	11



### 9. CCS7 – Drought resilience and using water efficiently

What are your views on the proposed best practice objective to use mains and surface water more efficiently to improve drought resilience?

● Neutral or no opinion	7
● Goes too far	1
● About right	6
● Does not go far enough	11



A summary of the main issues raised in those representations and how those issues will be addressed in the final SPD proposed for adoption are set out below:

Summary of issue raised	How the issue was taken into account
Queries about the scope of the SPD and the type of development that it will be applied to.	The SPD has been amended to clarify that it applies to new buildings and not applications for changes of use, retrofitting existing buildings or householder applications.
General comments that the provision of further information at planning application stage will be overly bureaucratic and be an additional burden that could prevent development coming forward in a timely way.	The SPD has been amended to include the provision of a proforma to clarify how relevant information can be provided in a consistent way.
Comments that there are too many 'get out' clauses that mean that developers can avoid meeting higher standards.	The SPD has been amended to clarify the 'best endeavours' approach. Responses to representations have clarified that new standards or policies can only be introduced through the local plan review.
Suggestion that the SPD should refer to lithium-ion cells for energy storage.	The SPD has been amended to refer to 'smart controls and demand flexibility', 'intuitive & flexible energy use' and 'energy storage' as referenced in the net zero carbon toolkit.
Suggestion that SuDS should apply to all development and not just major development.	The SPD has been amended as suggested.
Comment that the SPD should refer to modern methods of construction in relation to embodied carbon.	Text has been added to the SPD to reference the potential use of modern methods of construction in relation to embodied carbon.
Comment that the SPD does not mention the importance of plants and trees in cooling and shading.	The SPD has been amended to reflect the importance of trees and plants in helping to provide heatwave mitigation in the best practice section
Comment that nature-based solutions can help provide for climate change mitigation and adaptation.	The SPD has been amended to include references to nature-based solutions and to signpost other relevant documents.

### Preparation of the Draft SPD

In preparing the draft SPD for consultation in 2023, several key experts and advisory bodies were engaged to provide insight on technical specification. This included advice on Passivhaus design principles, the net zero-carbon toolkit and performance targets for space heating demand published by RIBA, LETI and UKGBC.

Officers also engaged with internal planning team colleagues and the joint climate change officers' group from Hampshire County, and District Councils, many of whom work within

organisations that have also declared both a climate & nature emergency and have worked on related policy.

The draft document was developed in early 2023 before being scrutinised internally by the Council's senior officers and management. This was then taken forward to Cabinet in March of 2023 where the draft document was approved for consultation. The draft SPD was then published for consultation which ran from the 23rd of May 2023 to Tuesday 11th of July 2023.

### **Sustainability Appraisal of the SPD**

Section 180 (5) (d) Planning Act (2008) removed the compulsory requirement for a Sustainability Appraisal for an SPD, as they are supplementary to adopted local plans that have already been subject to one.

Accordingly, there is no formal requirement under the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) to undertake a sustainability appraisal of this draft SPD.

The draft Planning for Climate Change SPD is supplementary to the NFDC Local Plan Part One: Planning Strategy (adopted 2020). As SPD it sets out policy implementation advice and recommended best practice standards, rather than new policy.

The sustainability appraisal for the adopted local plan can be found at:

[Local Plan 2016-2036 part 1: Planning strategy - New Forest District Council](#)

**April 2024**