New Forest National Park Authority

Local Plan Review

Climate Change

Topic Paper

August 2026

1. Introduction

1.1. As demonstrated by the Climate and Ecological Declaration in 2019 and throughout consultations on the Local Plan review, the issue of climate change has been identified as a key area for the Authority to address.

1.2. The Authority has set the target of net zero across the New Forest by 2050 through significant cuts in land-based emissions and the conservation and restoration of natural ecosystems. A framework[1] has been developed which sets out actions for the Authority to follow in partnership with other National Parks and organisations to ensure the threat imposed by climate change is reduced long-term.

1.3. The New Forest National Park is unique in its landscape, mix of wildlife and culture. It contains the highest proportion of land protected for nature in any UK national park or local authority area[2], with 56% internationally designated as Special Areas of Conservation, Special Protection Areas, or Ramsar Sites, and a further 5% as locally-important conservation areas. This land is home to the UK's highest concentration of rare species including breeding birds like the curlew and Dartford warbler.

1.4. The presence of this unique wildlife means that the National Park is particularly sensitive to the impacts of climate change and must consider the long-term implications of a changing climate on the natural environment.

1.5. There are many ways in which climate change can be identified and reduced, such as through the restoration of habitat, flood mitigation works, and public campaigning. In terms of the built environment, the UK government has indicated that local government, through the planning system, plays a vital role in enabling the transition to net zero[3].

1.6. The most effective method to address climate change is through plan-making and monitoring whereby policies within the Local Plan can be reviewed to assess their effectiveness in meeting priorities identified by government such as net zero by 2050. This is done through annual monitoring reports and/or the

[1] Net Zero with Nature, see: https://www.newforestnpa.gov.uk/conservation/climate-and-nature-emergency/climate-and-nature-emergency-and-the-new-forest-national-park/
[2] Annual review 2024-2025 - New Forest National Park, see: https://www.newforestnpa.gov.uk/document/annual-review-2024-2025/
[3] The role of local government in reaching net zero - House of Commons Library, see: https://commonslibrary.parliament.uk/research-briefings/cdp-2023-0122/

wider Local Plan review[4] process to allow the Authority to identify areas where local policies should demonstrate a stronger commitment to sustainable development i.e., (environmental objective) … supporting development that reduces the impact of climate change through mitigation and/or adaptive measures[5].

1.7. Many key aspects of national policy, guidance and law relating to National Parks remain unaltered from the time the 2019 Local Plan was prepared, examined and adopted. Consequently, the Authority is undertaking a partial review of the Local Plan rather than preparing a new Local Plan. The Local Plan Review will cover the period 2024 – 2043.

1.8. The New Forest National Park Authority is currently undergoing a review of the Local Plan. Since this topic paper was published in 2025, the plan has undergone Regulation 18 consultation Part 2 (Nov-Dec 2025). A full draft Local Plan, which included a new chapter on climate change, was presented for stakeholders to comment on. This chapter consisted of policies that are considered to play a direct role in reducing the impact of climate change. The outcome of this consultation is discussed later within this topic paper.

1.9. This background paper seeks to clarify the position the Authority has taken to address climate change as a priority for plan-making, whilst also acknowledging that as a National Park the need to reflect on the statutory purposes and duty. These are set out below:

- *To conserve and enhance the natural beauty, wildlife and cultural heritage of the area*.

- *To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public*.

- *A statutory duty to seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes*.

1.10. It is vital that policies within the Local Plan do not conflict with the purposes or duty of the National Park when considering the impact of climate change. Decision-making should weigh the benefits of development that seeks to

[4] Local Plans are expected to be reviewed every 5 years to ensure they are up-to-date and reflect changing needs and national policy (https://www.gov.uk/guidance/plan-making)
[5] Para 8c) of the NPPF (updated December 2024)

improve the New Forest's resilience against climate change against the purposes that seek to protect its unique qualities and landscape.

1.11. In light of this, the updates to the Local Plan (through the review process) will seek to complement the National Park purposes and protect the special qualities of the New Forest, and ensure development can positively contribute towards reducing the impact of climate change.

1.12. This Topic paper will outline:

- What legislation says that planning authorities should do to address climate change;
- The Protected Landscape Duty;
- Responses to the Regulation 18 consultation (Part 1 and 2) and subsequent amendments to the Draft Local Plan;
- Appropriate sources of renewable energy in the New Forest National Park; and
- Conclusion i.e., opportunities looking beyond the Local Plan review.

2. The Legislation

The Climate Change Act 2008

2.1. This Act commits the UK Government to reducing carbon dioxide emissions to net zero by 2050 i.e., carbon dioxide emissions must be reduced to at least 100% below 1990 levels by 2050. Through this framework, interim targets are set, and UK-wide Climate Change Risk Assessments are produced every five years which identify risks and priority areas for action, such as risk to terrestrial and freshwater ecosystems which is a focal point of the New Forest.

2.2. All sectors of the UK economy are required to meet the 2050 target which is statutory.

Section 19(1A) of the Planning and Compulsory Purchase Act 2004

2.3. Sets out the duty for Development Plan Documents to include policies that enables land within the local planning area to mitigate and adapt to climate change. Therefore, this evidences that local planning authorities have a duty to address climate change issues within the plan-making process.

The Planning and Energy Act 2008

2.4. The PEA 2008 establishes that local planning authorities may set higher standards for energy efficiency in their Local Plan policies than the baseline required by the Building Regulations provided that such policies are: a) reasonable, b) not inconsistent with national policies; and c) compliant with the usual provisions around plan making found in section 19 of the Planning and Compulsory Purchase Act 2004.

National Planning Policy Framework (NPPF) (updated December 2024)

2.5. The NPPF outlines that the planning system should support the transition to net zero by 2050 by responding to the identified long-term risks associated with climate change.

2.6. NPPF para 162 states *"Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating and drought from rising temperatures"*.

2.7. Therefore, it is important that the Local Plan is able to demonstrate that a proactive approach to mitigating and adapting against the impacts of climate change. This is especially important at examination stage when the Local Plan Inspector will consider the submitted Development Plan Documents against national planning policy.

Planning Practice Guidance (PPG)

2.8. The PPG provides additional guidance in relation to the NPPF and how its policies should be considered. A climate change chapter is provided within the PPG and sets out the fundamentals as to why it is important that the planning system supports the transition to net zero.

2.9. It outlines that in supporting the NPPF through the Local Plan there is also *"a statutory duty on local planning authorities to include policies in their Local Plan designed to tackle climate change and its impacts"*.

2.10. Local Plans can address climate change through supporting development which provides mitigation and/or adaptation within proposals. The following are examples of mitigating climate change by reducing emissions:

- *Reducing the need to travel and providing for sustainable transport*

- *Providing opportunities for renewable and low carbon energy technologies*
- *Providing opportunities for decentralised energy and heating*
- *Promoting low carbon design approaches to reduce energy consumption in buildings, such as passive solar design*

2.11. These are suggested examples of adapting to a changing climate:

- *Considering future climate risks when allocating development sites to ensure risks are understood over the development's lifetime*
- *Considering the impact of and promoting design responses to flood risk and coastal change for the lifetime of the development*
- *Considering availability of water and water infrastructure for the lifetime of the development and design responses to promote water efficiency and protect water quality*
- *Promoting adaptation approaches in design policies for developments and the public realm*

2.12. Many of the examples are already adopted within the Local Plan in some capacity and will remain unchanged. However, in reflection of representations received during consultation some will be reinforced through stronger wording or the introduction of new policies.

Written Ministerial Statement (WMS)

2.13. There has been conflicting information surrounding the issue of whether local planning authorities are able to set energy performance standards higher than building regulation within their Local Plan.

2.14. Most notably is the WMS December 2023[6] which stipulated that any planning policies that go above current or planned building regulations should be rejected at examination unless they meet the following criteria; 1) the development remains viable and impact on housing supply and affordability is considered in accordance with the NPPF, and 2) the additional requirement is expressed as a percentage uplift of a dwelling' Target Emissions Rate (TER) and calculated using a specific version of the Standard Assessment Procedure (SAP).

2.15. The WMS highlighted that the need to deliver housing and the upcoming release of the Future Homes Standard were the main reasons for government to limit

[6] https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123

local authorities in adopting above national standards. It has been widely debated whether increased energy efficiency targets within Local Plans hinders housing delivery[7].

2.16. However, the notion local planning authorities are limited in their powers has since been dispelled through a court of appeal judgement (*i.e., R (Rights: Community: Action Limited) v SSHCLG [2025] EWCA Civ 990*). Additionally, examples of other Local Plans (e.g., Cornwall, BNES, Merton) demonstrate policies examined by Inspector and deemed sound[8].

2.17. The Winchester District Local Plan recently went under examination in Summer 2025 whereby the Inspector commented on Policy CN3 which proposes higher local energy efficiency standards, utilising an adopted Energy Use Intensity Use (EUI) framework, instead of percentage increase against the Target Emissions Rate (TER). The standards were found to be justified by the Inspector and consistent with national policy, following minor modifications.

2.18. It is worth noting that Winchester forms a more populated and denser city than the New Forest National Park. So, while the emerging Winchester District Local Plan provides a recent Hampshire precedent, it hints at the issue of viability within a given plan-area. For instance, the number of buildings and their proximity to one another differs significantly between the two planning authorities and means that some methods of climate change adaptation/mitigation would not be considered viable, namely district heating networks which capitalise on proximity between buildings.

2.19. The New Forest is also uniquely impacted by its protected landscape designation which means that all relevant bodies have a duty to seek to further the purposes of conserving and enhancing the National Park. This duty would make some sources of renewable energy inappropriate for development due to their impact on the protected landscape.

3. The Protected Landscapes Duty

3.1. Since the adoption of the first New Forest National Park-wide planning policies in 2010 there have been significant changes in national policy, which continues

[7] https://www.apse.org.uk/index.cfm/apse/research/current-research-programme/rising-to-the-climate-change-challenge-the-role-of-housing-and-planning-within-local-councils/
[8] https://goodhomes.org.uk/net-zero-planning-policy

to confirm that national parks have the highest level of protection in relation to landscape and scenic beauty.

3.2. Changes introduced through Section 245 of the Levelling Up & Regeneration Act 2023 require 'relevant bodies' to seek to further these statutory National Park purposes in undertaking their functions. This strengthened duty applies to a wide range of bodies, including national park authorities, constituent local authorities and statutory undertakers.

3.3. In terms of ensuring the plan-making process remains consistent with the duty it is important to consider the following:

- Are such measures appropriate and proportionate to the type and scale of the function and its implications for the area? For instance, are measures in keeping with the natural beauty, the special qualities and key characteristics of the Protected Landscape?

- Could the measures contribute to the conservation and enhancement of the Protected Landscape's wildlife, ecological value and quality, geological and physiographical features, water environment, cultural heritage, dark skies, tranquillity, opportunities for access to nature, and landscape character for which the area was designated?

- Are there ongoing management needs for these measures?

3.4. In reviewing the current Local Plan, it is important to reiterate that any proposed policies which support climate change mitigation/adaptation should not conflict with the protected landscape duty. As a relevant body, the Authority should use the Local Plan to seek to further the conservation and enhancement of the National Park in balance with the need to respond to climate change.

4. Representations to the Regulation 18 Part 1 Consultation (Feb-Mar 2025)

4.1. The Authority received representations from a mix of stakeholders in total, of which many advocated for the Authority to adopt a stronger approach to addressing the climate emergency.

4.2. Stakeholders highlighted the need for the Local Plan to remain consistent with updates in national planning policy/guidance which has implications for climate

change. The Strategic Flood Risk Assessment (SFRA) and water management policies were in need of updating to remain consistent with the NPPF and account for the increase in surface water as a result of climate change. The reviewed Local Plan will look to include additional guidance on Nature-Based Solutions and Sustainable Drainage Systems. Additionally, a new Coastal Management Area policy will be developed to address the pressing issue of coastal erosion and sea level rise, which as evidenced by the Hurst Spit to Lymington Strategy[9] poses a significant risk to local heritage as well as valuable saltmarsh habitat.

4.3. Updates to planning for the natural environment through the Environment Act 2021 were identified. In response the Authority has developed a Biodiversity Net Gain policy which sets out the requirements for development to deliver 10% minimum biodiversity gain. Consideration has been given to increasing the requirement beyond 10% to reflect the ambitions and status of the New Forest as a National Park, however this will need to be informed by commissioned viability work and weighed against other planning pressures. Details regarding the development of the Wiltshire/Hampshire Local Nature Recovery Strategies affecting the National Park are also introduced to the reviewed Local Plan.

4.4. Many representations received noted the importance of sustainable construction methods and adopting standards, such as Passivhaus, to encourage developers to build to reduce their carbon impact/build sustainable homes. The Authority recognises that in meeting the net zero by 2050 target there is a pressing need to encourage development to be carbon neutral / net zero. As such, the revised Local Plan features a new chapter on climate change which pools together relevant policies that seek to ensure development is able to adapt and/or mitigate to climate change. These are summarised below:

New 'Climate Change' chapter policies	**Policy summary**
Policy SP7: Safeguarding and improving water resources	Prevents development which harms the quality and yield of water resources. Development should address surface water run-off and associated flood risk. Sustainable drainage systems (SuDS) have been introduced as measures for development to implement, in combination with nature-based solutions. New water efficiency standard.

[9] https://www.hurstspit2lymington.co.uk/

Policy SP8: Flood Risk	Development should not increase risk of coastal, fluvial or surface flooding. National Planning Policy Framework and Coastal Management Area Plan policies must be followed.
Policy SP9: Sustainable Construction	All development should mitigate and adapt against the impact of climate change through improving building performance and sustainable design.
Policy SP10: Renewable Energy	Renewable energy generation is deemed acceptable where is it 'small-scale' and has minimal visual/adverse impact on the unique character of the National Park e.g., landscape, heritage etc. The Authority remains supportive of energy projects for local community facilities.

4.5. Sustainable construction was identified as an area for review, with representations advising that the Local Plan adopts net zero or carbon neutral development as standard i.e., development must address carbon impact on site and/or offset carbon emissions. As this is only a Local Plan review, the Authority has elected to anticipate the release of the Future Homes Standard (due late 2025) and will therefore expect developers to reduce carbon emissions from new homes by 75%-80%[10]. Building Regulations will remain the primary mechanism in which the Future Homes Standard will be enforced. Policies within the reviewed Local Plan will seek to support this national framework and continue to advocate for sustainable construction, design, renewable energy etc, with the intention of reducing carbon emissions.

5. Representations to the Regulation 18 Part 2 Consultation (Nov-Dec 2025)

5.1. This round of consultation received a much higher response rate than Part 1, and this is primarily attributed to the introduction of the draft Local Plan, with full draft policies, and the supporting evidence base work. There were 1,100+ representations to the consultation, with 32 received on 'Chapter 5 – Climate Change'.

5.2. Comments remained in favour of the policies the Authority had set out to address climate change and largely sought stronger wording and/or additional criteria to policy to provide clarity or stronger reference to national guidance.

[10] https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation

5.3. Updates to the draft Local plan namely concerned water management and included making reference to Source Protection Zones to safeguard public drinking water. Additional text on sustainable drainage systems to note that where suitable drainage systems are not implemented, the risk of flooding increases significantly, which is then exacerbated by the impact of climate change. Updates to wording to note that the Environment Agency's Flood Zones do not account for surface of groundwater flooding, which pose additional risk to fluvial and coastal flooding.

5.4. The draft Local Plan has also been amended to reflect the release of the Future Homes Standard (FHS) which now serves as a framework to guide new residential development towards net zero by 2050. The Future Building Standard for non-domestic development will follow in 2027. The financial implications of the FHS have been considered across evidence work commissioned to support the Local Plan Review, namely the Economic Viability Assessment (EVA) which identified the uplifts in Building Regulations and cements them as an additional cost for development. The viability of increasing building efficiency, or other sustainable measures beyond national standards (e.g., biodiversity net gain), was largely dependent on 'viability headroom' identified throughout the assessment, in addition to local priorities.

5.5. The main purpose of the EVA was to demonstrate that policy could support 50% affordable housing on sites of three or more dwellings within the Defined Villages and on sites allocated for residential development in the Local Plan, and, that the financial burdens associated with national standards would not make development unviable.

5.6. It was concluded that the affordable housing policy could be supported and that legislative requirements currently provide a suitable baseline for the Authority to follow in promoting net zero across new development. The Local Plan will continue to advocate for development that achieves greater feats of sustainable construction. Proposals for all development should implement the criteria outlined within policy, which has been amended following consultation to strengthen the response to climate change.

6. Appropriate sources of renewable energy in the New Forest National Park

6.1. The New Forest National Park is designated as a national park in recognition of its exceptional natural beauty, biodiversity, and rich cultural and archaeological

heritage. This designation protects its special qualities and ensures the planning system can manage development pressures against the need to comply with the protected landscape duty. As such, it has the highest level of landscape protection under the National Planning Policy Framework.

6.2. All forms of development must seek to further the statutory purposes of the National Park i.e., conserve and enhance the natural beauty, wildlife and cultural heritage of the area. This requires recognising that development for renewable energy must be in proportion to the unique landscape of the New Forest.

6.3. Proposals for renewable development should refer to the Landscape Character Assessment, Landscape Action Plan and Tranquillity Mapping Report[11] to ensure that development maintains the special character of the New Forest National Park. The character assessment, in particular, identifies the characteristics and sensitivities of different areas across the National Park and should be used to inform the type, scale and location of renewable energy projects.

6.4. The review of the Local Plan has provided an opportunity to highlight the importance of ensuring planning decisions conserve the landscape character and scenic beauty of the National Park. Policies directly affecting the renewable energy development include: Policy SP9 Sustainable Construction, Policy SP10 Renewable Energy and Policy SP14 Landscape Character.

6.5. Both Policy SP10 Renewable Energy and Policy SP14 Landscape Character have been carried forward without change and continue to support proposals for ‘small-scale’ development that does not have an adverse impact on the beauty and landscape character of the New Forest.

6.6. Policy SP9 Sustainable Construction has been updated to cover a wider range of matters, and was previously known as ‘SP11 Climate Change’. This policy also reaffirms the need for ‘small-scale’ renewable energy sources to respond sensitively to the character of the local area.

6.7. Whether a proposal is deemed ‘small-scale’ or not should be informed by its potential impacts on the local environment and whether the scale, type or location of the proposed would conflict with the statutory purpose to conserve the natural beauty, wildlife and cultural heritage of the National Park. For

[11] https://www.newforestnpa.gov.uk/planning/landscape-policy-documents/

instance, some renewable energy projects can exploit their proximity to other buildings and be deemed 'more acceptable' if suitably screened away from impacting on the visual quality of the landscape.

6.8. In most instances 'small-scale' will be developments designed to serve individual buildings or proposals led by local communities designed to meet local energy need. The National Planning Policy Framework places the responsibility on all communities to contribute towards energy generation from renewable or low carbon sources. Policy SP10: Renewable energy remains supportive of energy projects for local community facilities.

6.9. Para 5.37 of the Local Plan has remained unchanged and outlines "*The New Forest is not an appropriate location for on-shore wind development due to insufficient wind speed and the impact such development would have on the landscape and statutory National Park purposes. Similarly, larger renewable energy developments to meet a wider-than-local need are not appropriate within the National Park.*" This aligns with the strengthened protected landscape duty and should be used as a starting point to guide appropriate renewable energy sources.

7. Conclusion

7.1. The Local Plan review has enabled policies to be pooled together and assessed to ensure greater weight is given to climate change for decision-making within the New Forest. This has been done in recognition of the strengthened landscape duty for protected landscapes.

7.2. Following Regulation 18 consultation (part 1 and 2) the Local Plan has been revised to reflect the need to respond to climate change. This has meant strengthening policy to evidence how development has considered measures to improve building efficiency and/or sustainability. While this does not go beyond national standards, the revised policies within the Local Plan will continue to be monitored and provide an indication of progress in meeting the national target of net zero by 2050.

7.3. Uplifts in other policy areas relating to climate change, such as Biodiversity Net Gain will be a consideration for the next Local Plan, and will be supported by the adopted Local Nature Recovery Strategies, which will enable the focused delivery of measurable habitat enhancement.