

# Summary of NPPF changes on climate policy areas compared to December 2024 NPPF

Topic (from climate guide)	Major progress	Minor progress	Neutral / uncertain	Minor regression	Major regression	Notes
Carbon literate planning				✓		<ul style="list-style-type: none"> <li>Carbon assessments - no change in status</li> <li>Relationship to current carbon budget not clarified</li> <li>Narrows 'radical reductions' to spatial strategy and allocations</li> <li>Nothing on emissions from speculative applications</li> </ul>
Operational emissions					✓	<ul style="list-style-type: none"> <li>Curtails ability to set higher standards than building regs, even where demonstrably viable</li> </ul>
Embodied carbon			✓			<ul style="list-style-type: none"> <li>Harder for LPAs to require whole life carbon assessment</li> <li>Unclear – contradiction between plan making and design policy</li> </ul>
Sustainable transport			✓			<ul style="list-style-type: none"> <li>PM policy further supports vision led transport approach</li> <li>But DM policies provide weak basis for refusal of development with significant carbon emissions from transport</li> </ul>
Renewable energy		✓				<ul style="list-style-type: none"> <li>Further embeds December 2024 NPPF policy changes</li> <li>Strengthened requirement on identification of areas for renewables and electricity infrastructure</li> </ul>
Resource efficiency				✓		<ul style="list-style-type: none"> <li>No PM hook – limits to DM consideration</li> <li>Scope of action limited by other areas of the NPPF (PM13)</li> <li>Harder for LPAs to require assessment (e.g. whole life carbon)</li> </ul>
Retrofit			✓			<ul style="list-style-type: none"> <li>No PM hook – limits to DM consideration</li> <li>Limited scope – energy efficiency and heat (not overheating, flood resilience, avoiding demolition)</li> </ul>
Long term adaptation				✓		<ul style="list-style-type: none"> <li>Focus on design and site level interventions, rather than strategic</li> <li>Missed opportunity to ensure key objective of SDSs</li> <li>More proactive approach to planning for water (W1)</li> </ul>
Planning for flood risk					✓	<ul style="list-style-type: none"> <li>Surface water flood risk removed from sequential test</li> <li>Permanent presumption in favour undermines strategic approach</li> <li>Weakened consultee oversight (EA and LLFA)</li> </ul>
Coastal change		✓				<ul style="list-style-type: none"> <li>More precautionary approach to coastal development</li> <li>Reference to Shoreline Management Plans</li> </ul>
Water scarcity		✓				<ul style="list-style-type: none"> <li>New policy on water infrastructure (W4) and planning for water (W1)</li> <li>Water efficiency measures appear limited (PM13)</li> </ul>
Design for climate resilience			✓			<ul style="list-style-type: none"> <li>Design principle on climate (DP3 1 c)</li> <li>Standards for green infrastructure (N1)</li> <li>However, scope is curtailed by policy elsewhere (PM13)</li> <li>More detail on tree lined streets and selection of resilient species</li> </ul>
Overheating			✓			<ul style="list-style-type: none"> <li>Contradictory - design hooks curtailed by policy elsewhere (PM13)</li> <li>Building regs on overheating not fit for purpose for many urban areas</li> </ul>