



**National
Landscapes
Association**

NATIONAL PLANNING POLICY FRAMEWORK

National Landscapes Association consultation response

Open consultation: Ministry of Housing, Communities and Local Government

Deadline: 10 March 2026

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Key points:

1. **We welcome the change from 'landscape and scenic beauty'** (current NPPF para 189) to **'natural beauty'** N4 (1) in the proposed draft, as this **aligns better with the underpinning legislation for National Landscapes.**
2. **We have concerns that some of the wording changes in the proposed draft NPPF will inadvertently reduce protections** and lead to the degradation of nationally designated protected landscapes. These changes include some crucial and long-standing tenets of the protection, merit and scrutiny afforded to these places by Local Planning Authorities, developers and others; removing these would convey the message that such scrutiny or merit is no longer warranted.
3. **There needs to be a better way for decision-makers to differentiate between the many 'substantial weights' now proposed in the draft** – the current parity of weights looks neat but fails to recognise the statutory, nationally designated status of National Landscapes and National Parks, which has a greater weight than other considerations without a statutory basis. **We recommend that the 'substantial weight' of the draft should therefore be reverted to the current 'great weight' when referring to protected landscapes.**
4. We think that Spatial Development Strategies (PM1) offer the opportunity to create genuinely holistic spatial strategies for delivering affordable homes, healthy and green neighbourhoods, space for nature, sustainable living and vibrant communities, sufficient provisioning and accessible routes and ways. **Considering protected landscapes at a genuinely strategic scale should be a critical component of such strategies**, and the NPPF revisions should require that **National Landscapes, National Parks and National Trails are considered as critical national infrastructure or as key components of such Spatial Development Strategies.**
5. It is critical that a consistent position is taken to major development in protected landscapes at both plan-making and decision-making stages. In the proposed draft NPPF, there are several policies that create inconsistency, which we expect will give rise to confusion.
6. The emphasis in the current NPPF requires strategic policies and plans to address economic, social and environmental priorities together, as well as to conserve and enhance landscapes and address climate change. These are not carried forward into the proposed draft NPPF. We are concerned that this discontinuity would have the effect of deprioritising the environment in plan-making, thus upsetting the balance of sustainable development.

1: Introduction

Question 5) Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

The National Landscapes Association are very concerned about the switch from the current 'great weight' of current NPPF in relation to protected landscapes to 'substantial weight' throughout the proposed new NPPF.

We understand that this might be intended to provide consistency across the policies of the NPPF, however, protected landscapes and designated heritage assets are statutorily designated, unlike numerous other themes in the proposed NPPF to which substantial weight is attributed, and which are purely policy based. We consider there should be a clear difference between the weight afforded to statutorily designated assets (i.e. protected landscapes and designated heritage assets) and the weight afforded to the other policy-based themes in the NPPF. The weight to be applied should reflect the statutory, nationally designated status of these assets. We therefore consider the wording needs to revert to "great weight" in those two instances.

2: Plan-making policies – The Plan-making framework

PM1 Spatial Development Strategies

Question 6 Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly disagree

a) Please provide your reasons, particularly if you disagree.

The National Landscapes Association are very concerned that PM1 currently contains no explicit requirement for the new Spatial Development Strategies (SDS) to address landscape issues.

National Landscapes are outstanding, iconic landscapes whose distinctive character and natural beauty are so precious that they are safeguarded in the national interest. They are of immense value to the nation, offering a wide range of public goods and services. Nationally designated National Landscapes will often be at an SDS level, and are a strategic plan-making matter, critical to setting the context for, and informing, subsequent Local Plans. SDSs offer the opportunity to create a genuinely holistic spatial strategy for delivering affordable homes, healthy and green neighbourhoods, sustainable living and vibrant communities, and considering impacts on landscapes (including protected landscapes) at a strategic scale is a critical component of such strategies.

We consider that the wording of PM1 (1) should be amended to read "*Spatial development strategies should set a positive vision for future growth and change at a sub-regional scale and provide a clear spatial framework for investment and growth including for new housing, along with **addressing other economic, social and environmental priorities***" (text = additions, which includes text from current NPPF para 15).

We also advise that, to ensure adequate consideration of National Landscapes at the strategic plan-making level, (with regard to section 85 of the CRoW Act), the wording of PM1 (2) should be expanded with an addition sub-point to set out "***making sufficient provision for the conservation and enhancement of the natural, built, and historic environment, including protected landscapes and green infrastructure.***" (bold text = additions, which includes text from current NPPF para 20).

To the same end, and for clarity, we consider PM1 (2) (b) needs to include specific reference to the presumption against major development in protected landscapes, (as set out in decision-making policy N4 (2)). Suggested additional wording: "***When considering potential allocations within Protected Landscapes, the requirements of Policy N4 (Protected Landscapes) relating to major development should be applied.***"

A further concern is that while the SDS approach offers potential for a larger area in which housing provision can be considered, there is currently no reference in PM1 (2) (a) as to how such '*apportionment to local planning authorities in the strategy area of objectively assessed needs for housing*' also would reflect to S1 (1) (a) (i). That policy importantly allows Local Planning Authorities (LPAs) to plan for less than the objectively assessed need (OAN) in certain circumstances, i.e. where the application of the policies in this Framework that protect assets such as protected landscapes provides a strong reason for restricting the overall scale, type or distribution of development in the plan area.

We are genuinely concerned that this disconnect between PM1 and S1 in this respect would render the application of S1 highly difficult, if pre-empted by an SDS which pre-set the housing requirement of an LPA. We therefore consider it essential that PM1 (2) (a) also includes reference to taking account of S1 (1) (a) in such apportionment.

We would also take this opportunity to highlight a broader concern with OAN and protected landscapes – the December 2024 change to the standard method for calculating OAN has resulted in significant increase in housing need figure for most LPAs who have substantial areas within National Landscapes. For LPAs without an up-to-date local plan, this increase in OAN has resulted in a significant decrease in the LPA 5-year housing land supply figures, increasing the pressure for LPAs to seek to accommodate a much larger amount of housing in their emerging local plans, (despite the provisions of current NPPF para 11 (b) (i), new proposed S1 (1)) and increasing the pressure for LPAs to grant approval for inappropriate development within National Landscapes and their settings. Whilst we would welcome changes to the standard method to reflect the presence and importance of protected landscapes in plan-making areas, in the meantime it is critical that PM1 gives confidence to plan-makers of SDSs and Local Plans that it is not their OAN that they will be expected to accommodate, but rather their housing requirement, devised with regard to SP1, H02 (1) and H02 (3) (a).

PM2: Local Plans

Question 9 Do you agree with the role, purpose and content of local plans set out in policy PM2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly disagree

a) Please provide your reasons, particularly if you disagree.

The National Landscapes Association are very concerned that several requirements of the current NPPF for plan-making regarding the environment and landscapes (current paras 11, 15 and 20) have not been carried forward into PM2 or S2.

Currently para 20 (d) of the current NPPF requires the overall strategy in plan-making to '*make sufficient provision for... conservation and enhancement of the natural, built and historic environment, including landscapes*' (inter alia). This is critical to ensure that environmental matters and landscape are given appropriate consideration at the plan-making stage.

We therefore consider that PM2 (1) (a) (iv) should be expanded to read "*has particular regard to meeting the identified development needs of the area in a sustainable manner in accordance with policy S1, **along with addressing other economic, social and environmental priorities***" (bold text = additions, reinserted text from current NPPF para 15).

And that PM2 (1) (a) should be expanded with a point (v) as follows: "***makes sufficient provision for the conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.***" (bold text = additions; includes reinserted text from current NPPF para 20).

Further, we consider that PM2 (1) (b) needs to include specific reference to the presumption against major development in protected landscapes, i.e. to N4 (2), which is presently solely a 'decision-making' policy. Suggested additional wording: "***When considering potential allocations within Protected Landscapes, the requirements of Policy N4 (Protected Landscapes) relating to major development should be applied.***"

It is critical that a consistent position is taken to major development in protected landscapes at both plan-making and decision-making stages.

Indeed, legal advice provided to the South Downs National Park Authority by Landmark Chambers concluded that “it would arguably amount to an error of law to fail to consider paragraph 116 [currently 190, proposed N4 (2)] at the site allocations stage of plan making for the National Park. The consequence of doing so would be to risk allocating land for major development that was undeliverable because it was incapable of meeting the major development test in the NPPF”.

PM14 Examining spatial development strategies

Question 19 Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly disagree

a) If not, please explain how this could be improved to ensure a proportionate assessment, making it clear which type of plan you are commenting on?

We are concerned with the inclusion of the phrase in proposed policy PM14 (2) (a) “*A strategy which does not provide for objectively assessed needs should be considered an exception*”; we are concerned that this would fail to reflect S1 (1) (a) (i). That policy importantly allows Local Planning Authorities to plan for less than the objectively assessed need (OAN) in certain circumstances, i.e. where the application of the policies in this Framework that protect assets such as protected landscapes provides a strong reason for restricting the overall scale, type or distribution of development in the plan area. We are genuinely concerned that this disconnect between PM14 and S1 in this respect would render the application of S1 highly difficult, if pre-empted by the OAN in an SDS. We therefore consider it essential that PM14 (2) (a) also includes explicit reference to taking account of S1 (1) (a), in the same way that PM15 (1) (a) does with regard to examining Local Plans.

4. Achieving sustainable development

Plan-making policies

S2 Producing a Spatial Strategy

Question 34 Do you agree with the proposed approach to setting a spatial strategy in development plans? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

a) Please provide your reasons, particularly if you disagree

The National Landscapes Association are very concerned that several of the requirements of the current NPPF for plan-making regarding the environment and landscapes have not been carried forward into PM2 or S2. We are worried that cumulatively this results in the de-prioritisation of the environment in the plan-making policies.

Currently para 20 (d) of the current NPPF requires the overall strategy in plan-making to ‘*make sufficient provision for...conservation and enhancement of the natural, built and historic environment, including landscapes*’ (inter alia). This is critical to ensure that environmental matters and landscape are given appropriate consideration at the plan-making stage. S2 (1) (c) is considered inadequate in this regard, failing as it does to mention the natural, built and historic environment, including landscapes.

We therefore consider that S2 (1) (c) needs to be expanded as follows “*Land that is protected or proposed to be enhanced for specific purposes (such as habitat improvement) and which places limits on whether development proposals may be acceptable or where specific policies apply, **including making sufficient provision for the conservation and enhancement of the natural, built and historic environment, including landscapes**; and...*” (bold text = additions; including reinserted text from current NPPF para 20):

Further, we consider that S2 (1) (c) needs to include specific reference to the presumption against major development in protected landscapes, i.e. to N4 (2), which is presently solely a 'decision-making' policy. Suggested additional wording: "***When considering potential allocations within Protected Landscapes, the requirements of Policy N4 (Protected Landscapes) relating to major development should be applied.***"

It is critical that a consistent position is taken to major development in protected landscapes at both plan-making and decision-making.

Indeed, legal advice provided to the South Downs National Park Authority by Landmark Chambers concluded that "*it would arguably amount to an error of law to fail to consider paragraph 116 [currently 190, proposed N4 (2)] at the site allocations stage of plan making for the National Park. The consequence of doing so would be to risk allocating land for major development that was undeliverable because it was incapable of meeting the major development test in the NPPF*".

National decision-making policies

S3. Presumption in favour of sustainable development

S4. Principle of development within settlements

S5. Principle of development outside settlements

Questions 36, 37, 38 and 39

36) Do you agree with the revised approach to the presumption in favour of sustainable development? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly disagree

37) Do you agree to the proposed approach to development within settlements? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly disagree

38) Do you agree to the proposed approach to development outside settlements? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly disagree

39) Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly disagree

a) Please provide your reasons.

The following comments relate to the three new decision-making policies S3, S4, and S5 (sustainable development) proposed to replace current NPPF para 11 (c) and (d).

The National Landscapes Association are very concerned that the current 'exception' or 'qualification' regarding the presumption in favour of sustainable development in the context of protected landscapes (and indeed other 'assets' such as heritage assets) set out in 11 (d) (i) of the current NPPF, has been omitted

in proposed new policies S3, S4 and S5. This caveat in existing policy is currently heavily used, and a cornerstone of ensuring the delivery of appropriate new housing in National Landscapes to support thriving rural communities, which is compatible with, and does not compromise, the character and natural beauty of National Landscapes. The omission of this caveat would significantly weaken the protection of National Landscapes and would undermine the application of N4 Protected Landscapes.

It is critical that the presumption in favour of sustainable development in national decision-making policies S3 and S4 retains the same qualification as current para 11d(i): "*unless: i. the application of policies in this Framework that protect areas or assets of particular importance [see footnote 7, above] provides a strong reason for refusing the development proposed*".

Without such qualification, the proposed S4 policy sets out a presumption in favour of development within settlements, without recognition of policies in the Framework that protect areas or assets of particular importance such as protected landscapes and designated heritage assets. (National Landscape impacts can often still be highly relevant within settlements, and settlement is often a key character component of the natural beauty of protected landscapes, while historic settlements often include a Conservation Area (a designated heritage asset)).

Meanwhile proposed S5 (1) sets out a presumption in favour of certain types of development outside settlements (including at (j) provision of housing where the LPA cannot demonstrate a five-year supply of deliverable housing sites), again without recognition of policies in the Framework that protect areas or assets of particular importance, and without distinguishing between statutorily designated and undesignated landscapes. This would significantly reduce the ability for effective application of policy N4 in Protected Landscapes.

Indeed it seems inconsistent that S5 (5) sets out that S5 does not apply to development proposals in the Green Belt or on land designated as Local Green Space (neither of which are statutory designations, but rather simply policy designations), but the same exemption is *not* given in that policy to protected landscapes, which are statutorily designated. We would strongly advocate for protected landscapes to also be listed in the 'exemptions' of S5 (5), with policy N4 being referred to as the relevant policy against which development proposals should be assessed.

S4 (2) (c) and S5 (2) set out circumstances in which '*the benefits of approving development proposals are likely to be substantially outweighed by adverse effects*', placing special significance on those policies in the NPPF that use the word 'refused'. While in the main these are the same as in the current NPPF, but as discussed above, one significant exception is the current paragraph 190, now encapsulated in N4(2) relating to major development within protected landscapes, which no longer contains the word 'refused'. This means that the proposed change of wording in N4 (2) is even more troubling when considered in the light of S4 (2) (c) and S5 (2). Notwithstanding, this would still only introduce the 'tilted balance' element of current para 11 (d) (ii). The stronger, more important 11 (d) (i) - which allows for the situation where "*the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed*" - is still not reflected in proposed S4 or S5.

We therefore consider it essential to reinstate the current wording of para 11 (d) (i) into S3, S4 and S5. This will ensure consistency in the decision-making policies with plan-making policy S1 (a) (i) and give clarity regarding the application of other policies in the Framework (i.e. N4 for protected landscapes). We advise the wording of current 11 (d) (i) needs to be added to the end of both S3 (1) (a) and S3 (1) (b), and, for clarity and completeness, after S4 (1) and S5 (1).

13. Protecting Green Belt land

Plan-making policies

GB5: Beneficial Use of Green Belt Land

Question 134 Do you agree the expectations set out in policy GB5 are appropriate and deliverable in Local Plans? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree

The National Landscapes Association welcomes the explicit reference to protected landscapes, in this context.

However, we are concerned that the Glossary definition of 'Grey Belt' is proposed to be amended to omit the current phrase: "*'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development*". We consider this phrase provides important clarification regarding Protected Landscapes and Grey Belt, and should be reinstated.

14: Achieving Well-designed places

DP1 A strategy for Design

Question 146 Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree

a) Please provide your reasons, particularly if you disagree.

The National Landscapes Association are concerned that useful descriptive, scene-setting text has been cut out from current NPPF chapter 12 para 131, which currently sets out that "*The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development*". Whilst the intention to 'slim down' the NPPF policies is acknowledged, the loss of such phrases means that important messages are not communicated to applicants and decision-makers. We consider this phrase should be included in the contextual text box at the beginning of chapter 14, and if the phrase cannot be accommodated in DP1, then at the very least, we advise this type of cut text should be incorporated into additional paras in the NPPG.

17. Pollution, public protection and security

P1: Planning for clean and safe places

Question 165) Do you agree with policy P1 as a basis for identifying and addressing relevant risks when preparing plans? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly disagree

a) Please provide your reasons, particularly if you disagree

We would like to see the list of types of pollution listed in P1 (1) (c) expanded to include light pollution, for completeness and consistency with P3.

19. Conserving and enhancing the natural environment

Plan-making policies

N1. Identifying environmental opportunities and safeguards.

Question 179 Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree

Partly disagree

a) Please provide your reasons, particularly if you disagree

The National Landscapes Association are pleased to see the reference to Protected Landscape Management Plans in N1 (1).

However, we are very concerned about the loss in proposed N1, of the phrase "*recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services*" currently in para 187 (b) of the current NPPF. This is an incredibly important perspective that underpins the more specific protections of protected landscapes. It is a key tenet of rural planning policy that was previously in PPS7 (2004), before being taken forward in the NPPF. We note that the phrase is incorporated in the introductory text box to Section 4: Achieving Sustainable Development, but we are concerned that without highlighting it in N1, policies and intentions are weakened (particularly as paragraph 10 states that the objectives at the start of each chapter are 'for context only and should not be applied as either plan-making or decision-making policy').

In order to better reflect a key tenet of rural planning and to set a context for the subsequent clauses of N1, we consider N1 (1) should be amended as follows:
*"Development plans should **recognise the intrinsic character and beauty of the countryside**, safeguard and enhance the natural environment, and reflect the wider benefits from natural capital and ecosystem services, by..."*(bold text = suggested additions)

National decision-making policies

N4. Protected Landscapes

Question 182 Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly disagree

a) Please provide your reasons, including how policy can be improved to ensure compliance.

N4 (1)

We welcome the change from 'landscape and scenic beauty' to 'natural beauty' in the proposed draft, as this aligns better with the underpinning legislation for National Landscapes.

The National Landscapes Association are very concerned about the omission in proposed N4 (1) of the statement (in current NPPF para 189) "which have the highest status of protection in relation to these issues [landscape and scenic beauty]". This status-affirming phrase is a key tenet of planning policy for designated landscapes; it is a long-standing legacy from the old PPS7 in published in 2004, which set out "*Nationally designated areas comprising National Parks, the Broads, the New Forest Heritage Area and Areas of Outstanding Natural Beauty (AONB), have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty*" (PPS7 para 21).

National Landscapes are outstanding, iconic landscapes whose distinctive character and natural beauty are so precious that they are safeguarded in the national interest. They are of immense value to the nation, offering a wide range of public goods and services. For over 20 years, this context has helped support the delivery of appropriate new housing in National Landscapes, including affordable housing based on local needs, making an important and positive contribution to support vibrant and thriving rural communities, which is compatible with, and does not compromise, the character and natural beauty of the National Landscape.

The phrase "highest status of protection" gives a powerful message to LPAs and developers regarding the status of these landscapes and the level of scrutiny that needs to be applied to assessing proposals. The removal of this phrase would send a harmful negative message, the perception that protected landscapes no longer warrant such status nor merit such scrutiny.

We therefore consider it essential that the phrase clarifying that protected landscapes "***have the highest status of protection in relation to this issue*** [natural beauty]" is reinstated into N4 (1).

Further, in N4 (1) issues of weight and importance are described. We are very concerned about the switch from the current 'great weight' (of current NPPF para 189) to 'substantial weight' in the proposed policy, which now reads '*Substantial weight should be placed on the importance of conserving and enhancing the natural beauty of these areas*'.

We understand that this might be intended to provide consistency across the policies of the NPPF, however, the conservation and enhancement of protected landscapes reflects a statutory requirement associated with their national designation, (e.g. for National Landscapes in s85 of the CRoW Act), unlike numerous other themes in the proposed NPPF to which substantial weight is attributed, and which are purely policy based rather than having any statutory basis. We consider there should be a clear difference between the weight afforded to conserving statutorily designated assets (i.e. protected landscapes and indeed designated heritage assets in HE6) and that afforded to the other policy-based themes in the NPPF, as these two alone have a statutory basis. The weight to be applied to protected landscapes should reflect the statutory, nationally designated status of these assets.

We therefore consider the wording needs to revert to "***great weight should be placed on the importance of conserving and enhancing the natural beauty of these areas.***" We also consider a footnote should be added to clarify that 'great weight' is higher than 'substantial weight' in any weight hierarchy.

Further, in N4 (1) we are concerned about inclusion of the phrase "...to avoid harm to their statutory purposes and special qualities" – not only is 'special qualities' not a term recognised in the relevant legislation for National Landscapes (CRoW Act 2000), but we would be concerned that this approach could open the door to a reductive argument that focusses on how a specific proposal relates to the individual 'special qualities' of a protected landscape without recognising the holistic impact, and that fails to recognise that the landscape value of a protected landscape is greater than the sum of individual parts.

We therefore consider that, for clarity and consistency, this sentence should instead end "***...to avoid harm to their natural beauty and statutory purposes.***"

We consider it would be helpful for N4 (1) to include a footnote clarifying "***the natural beauty of each protected landscape will usually be described in their respective statutory Management Plans.***"

We also consider that it would be helpful to add on to the end of the last sentence of N4 (1) the following text, to reflect the content of the current NPPF: ***"...which are also important considerations in National Landscapes."***

We also consider that the text of proposed N4 (4) relating to setting of protected landscapes would be better located within N4 (1), for clarity and consistency.

N4 (2)

National Landscapes are outstanding, iconic landscapes whose distinctive character and natural beauty are so precious that they are safeguarded in the national interest. They are of immense value to the nation, offering a wide range of public goods and services. Current NPPF para 190 is already considered too lenient regarding major development in National Landscapes, and we are concerned that the wording of proposed N4 (2) would further dilute this.

We are very concerned that the proposed change to the current NPPF explicit presumption of refusal of major development in protected landscapes (i.e. 'should be refused' in para 190), to a 'caveated approval' (i.e. 'should only be supported...') in N4 (2) of the proposed new NPPF, represents a weakening of protection of these landscapes.

The term 'should be refused' is included in a significant number of proposed policies in the new NPPF, therefore, to retain the current presumption of refusal in protected landscapes would be consistent with other proposed NPPF policies.

We therefore consider it essential that the wording of the opening line of N4 (2) be amended from the proposed 'caveated approval' to revert the presumption of refusal in the current NPPF, suggested wording: **"Proposals for major development within protected landscapes should be refused other than in...."**

Further we consider Footnote 70 to N4 (2) should be expanded to clarify that the term 'exceptional' denotes rarity.

Also, we are concerned about the proposed text amendment from the current 'other than in exceptional circumstances, **and** where it can be demonstrated that the development is in the public interest', to the proposed version which omits the word 'and'. The 'and' is particularly important as it represents a dual requirement.

Further in N4(2) we consider the term 'public benefit' should be accompanied by a footnote to clarify that 'public benefit' in this context should reflect that protected landscapes are statutorily designated landscapes and protected for the nation's benefit, in the national interest.

N4 (3)

The National Landscapes Association considers the subject of mitigation is effectively covered in N4 (2) (c), and therefore N4 (3) is superfluous, and to avoid confusion should be deleted.

If it is retained, then we are concerned by proposed Footnote 71 to proposed N4 (3): *"Where significant harm cannot be mitigated, it may be appropriate to consider whether suitable compensation would be acceptable."* Under N4 (2) (c), and indeed under N4 (1), proposals that cause significant harm to protected landscapes that cannot be mitigated should not be being approved - and therefore the footnote is contradictory to the rest of the policy.

We therefore consider that if N4 (3) is retained, then proposed Footnote 71 should be deleted. The matter of compensation would instead be better dealt with by adding onto the end of N4 (3) suggested additional wording ***"....and, as a last resort, considering whether compensation for any residual harms following mitigation would be acceptable"***

20: Conserving & Enhancing the Historic Environment

HE6: Proposals affecting designated heritage assets

Question 189 Do you agree with the approach to considering impacts on designated heritage assets in policy HE6, including the change from "great weight" to "substantial weight", and in particular the interactions between this and the statutory duties? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly disagree

a) Please provide your reasons, particularly if you disagree.

The National Landscapes Association are concerned about the switch from the current 'great weight' (of current NPPF para 212) to 'substantial weight' in the proposed policy, which now reads '*substantial weight should be given to the asset's conservation*'.

We understand that this might be intended to provide consistency across the policies of the NPPF, however, designated heritage assets are statutorily designated, unlike numerous other themes in the proposed NPPF to which substantial weight is attributed, and which are purely policy-based. We consider there should be a clear difference between the weight afforded to statutorily designated assets (i.e. designated heritage assets and protected landscapes) and that afforded to the other policy-based themes in the NPPF. The weight to be applied to designated heritage assets should reflect the statutory, nationally designated status of these assets. We therefore consider the wording needs to revert to "**great weight should be given to the asset's conservation.**"

Further Questions

Question 193 Do you have any further thoughts on the policies outlined in this consultation?

The National Landscapes Association have an overall general concern about the dilution of the clear messaging of the current NPPF regarding the importance of protected landscapes in the draft consultation version, through both individual points and cumulative impact.

National Landscapes are outstanding, iconic landscapes whose distinctive character and natural beauty are so precious that they are safeguarded in the national interest. They are of immense value to the nation, offering a wide range of public goods and services.

For over 20 years, current national planning policy has helped balance the protection of such landscapes along with supporting the delivery of appropriate new housing in National Landscapes, including affordable housing based on local needs. It has helped ensure new development makes an important and positive contribution to support vibrant and thriving rural communities, which is compatible with, and does not compromise, the character and natural beauty of the particular National Landscape. We would therefore be very concerned about any change to national planning policy which would diminish that potential.