



**National  
Landscapes  
Association**




## **National Planning Policy Framework: proposed reforms and other changes to the planning system**

### **National Landscapes Association response key messages**

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 to support vibrant and thriving rural communities, which is compatible with, and does not compromise, the character and natural beauty of the National Landscape.

- 1. We want to 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 do have concerns that some of the wording changes in the draft NPPF will inadvertently reduce protections and lead to the degradation of nationally designated protected landscapes.**
- 3. We want to retain the phrase “*the highest status of protection*” (para 189) in proposed policy N4 (1): Protected Landscapes. This is a crucial and long-standing tenet of the protection, merit and scrutiny afforded to these places by LPAs, developers and others; removing it would convey the message that such scrutiny or merit is no longer warranted.**
- 4. There needs to be a better way for decision-takers 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’ of the para 189.**
- 5. The current NPPF has explicit presumption of refusal of major development in National Landscapes and National Parks (i.e. ‘should be refused’ in para 190). This changes to a ‘caveated approval’ (i.e. ‘should only be supported...’) in the current draft’s N4 (2); this would weaken in-practice protection of these landscapes, which should not be the direction of travel for a new NPPF.**
- 6. The proposed new decision-making policies S3, S4 and S5 no longer recognise existing policies that protect areas or assets of particular importance. The omission of the current ‘qualification’ in NPPF para 11 (d) (i) (“*unless: i. the application of policies in this Framework that protect areas or assets of particular importance ... provides a strong reason for refusing the development proposed*”) means there is no longer a presumption in favour of sustainable**

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development in the context of protected landscapes, and no clear distinction made between statutorily designated and undesignated landscapes. This would significantly reduce the ability to effectively apply policy N4 in protected landscapes, threatening internal consistency of the NPPF.

7. We suggest 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. We are therefore concerned that the new policy PM1 does not mention or require the new SDSs to consider National Landscapes, National Parks or National Trails as critical national infrastructure or as key components of such Spatial Development Strategies.
8. It is critical that a consistent position is taken to major development in protected landscapes at both plan-making and decision-making stages. We consider that both PM1 SDS and PM2 Local Plans need to include presumption against major development in protected landscapes (as set out in N4), in order to ensure consistency across the NPPF. PM1 needs to explain how apportionment of 'objectively assessed needs for housing' (OAN) to local planning authorities (LPAs) reconciles with S1 (1.a.i), which importantly allows LPAs to plan for less than the OAN in certain circumstances, including in protected landscapes.
9. 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 (current paras 11, 15, 20). These are not carried forward into the current draft. We are concerned that this discontinuity would have the effect of deprioritising the environment in plan-making, thus upsetting the balance of sustainable development; we therefore recommend that these requirements are carried forward by adding them into PM2 Local Plans or S2 Producing a Spatial Strategy.
10. 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 NPPF is an important perspective and long-standing tenet of rural planning policy that underpins the more specific protections of protected landscapes. We are concerned about the loss of this phrase in proposed N1. Without recognition in N1 that the countryside does have intrinsic character and beauty that is worth protecting, all subsequent policies and intentions are weakened.