

DRAFT COMMENTS ON THE NATIONAL PLANNING POLICY CONSULTATION

Context

The Government is currently consulting on proposed revisions to the National Planning Policy Framework (NPPF). The consultation finishes on 10 March 2026.¹

The revisions include several changes in the way in which National Landscapes are addressed in national planning policy. I have addressed explicit references to National Landscapes (and designations that include National Landscapes, e.g. Protected Landscapes) in the table below.

The draft NPPF is here:

https://assets.publishing.service.gov.uk/media/6941965758a21370f58f304e/Draft_NPPF_December_2025.pdf

The current (December 2024) iteration of the NPPF is here:

https://assets.publishing.service.gov.uk/media/67aaf8f3b41f783cca46251/NPPF_December_2024.pdf

The consultation also includes a narrative on the proposed reforms, which I haven't looked through yet:

https://assets.publishing.service.gov.uk/media/69417a0958a21370f58f3010/December_2025_NPPF_Consultation_document.pdf

There is also a set of consultation questions, which I haven't looked through yet (as my main focus, to-date, has been on the changes relating specifically to National Landscapes).

Summary

Arguably, the most significant adverse change relating directly to National Landscapes is that the draft NPPF makes no explicit reference to the circumstances in which the application of NPPF policies relating to National Landscapes can provide a strong reason for refusal in decision-making (which is addressed in paragraph 11d(i) of the current NPPF).

It is also disappointing to see the removal of the statement that Protected Landscapes have the highest status of protection in relation to landscape and scenic beauty / natural beauty.

There are some beneficial changes such as Protected Landscape Management Plans being explicitly referred to (Policy N1 in the draft NPPF).

The draft NPPF also introduces the issue of compensation in relation to major development that is permitted in National Landscapes. This is a controversial issue. However, in principle, I am supportive of this change (although I think that the wording would need to be amended).

Given that the main thrust of the draft NPPF is to streamline the planning system and to have more of a pro-growth agenda, there are likely to be other changes that have implications for National Landscapes. I will undertake a broader review of the draft NPPF and associated consultation documents in the next few weeks.

¹ <https://www.gov.uk/government/consultations/national-planning-policy-framework-proposed-reforms-and-other-changes-to-the-planning-system>

Proposed changes relating directly to National Landscapes

Current NPPF:

- National Landscapes are explicitly mentioned five times (paragraph 189 (page 54), paragraph 190 (page 55), paragraph 224 (page 64), Annex 2: Glossary (page 72 and 75).
- National Landscape is explicitly mentioned once, in the context of areas or assets of particular importance (footnote 7 (page 6)).
- Areas or assets of particular importance, which include National Landscapes, are explicitly mentioned three times (paragraph 11 (page 6) (twice) and paragraph 76 (page 20)).
- Designated rural areas, which include National Landscapes, are explicitly mentioned twice (paragraph 65 (page 17) and Annex 2: Glossary (page 72)).
- Valued landscapes are explicitly referred to once (paragraph 187, page 54).

Draft NPPF:

- National Landscapes are explicitly mentioned four times (Policy M1, page 50 (digital page 52), Annex B: Glossary (three times - pages 104 (digital page 104), 108 (digital page 110) and 110 (digital page 112)).
- National Landscape is explicitly mentioned once, in the context of areas or assets of particular importance (Footnote 23, page 22 (digital page 24)),
- protected landscapes, which include National Landscapes, are explicitly mentioned eight times, mainly replacing reference to both National Parks and National Landscapes (Policy GB5, page 60 (digital page 62); Policy N1, page 87 (digital page 89); Policy N4 (five times), pages 89-90 (digital pages 91-92), Annex B: Glossary, page 110 (digital page 112)).
- Areas or assets of particular importance, which include National Landscapes, are explicitly mentioned once (Policy S1, page 22 (digital page 24)).
- Designated rural areas, which include National Landscapes, are explicitly mentioned twice (Policy HO5, page 33 (digital page 35); and Annex B: Glossary, page 104 (digital page 106)).
- The term 'valued landscapes' is not used but policy N1 refers to '*the hierarchy of international, national locally designated sites and areas of importance for their landscape ...value*'.

These references are shown in the table below. I have underlined the relevant designation and used italics where I have quoted the text from the NPPF documents. The policies are listed in the order that they appear in the current (December 2024) iteration of the NPPF.

Table of proposed changes relating explicitly to National Landscapes

Current NPPF wording	Proposed wording	Comments
<i>2. Achieving sustainable development</i>	<i>4. Achieving sustainable development</i>	
<i>Presumption in favour of sustainable development</i>	<i>Plan-making policies</i>	
	<i>S1: Positive plan-making</i>	
	<i>1 (page 22, digital page 24)</i>	
<i>11 (page 6). Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:</i>	<i>1. The development plan should plan positively for future growth and change by: a. Seeking to meet the development needs of their area as a minimum. For</i>	The wording related to 'areas or assets of particular importance', including National

Current NPPF wording	Proposed wording	Comments
<p><i>a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;</i></p> <p><i>b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:</i></p> <p><i>i) the application of policies in this Framework that protect <u>areas or assets of particular importance</u> [see footnote 7, below] provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or</i></p> <p><i>ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.</i></p> <p><i>Footnote 7: The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.</i></p>	<p><i>spatial development strategies, and for local plans where a spatial development strategy is not in place, this means providing for objectively assessed needs for housing and other uses (including supporting infrastructure), as well as any needs that cannot be met within neighbouring areas, unless:</i></p> <p><i>i) the application of the policies in this Framework that protect <u>areas or assets of particular importance</u> [see footnote 23, below] provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or</i></p> <p><i>ii) any adverse impacts of doing so would substantially outweigh the benefits, when assessed against the policies in this Framework taken as a whole.</i></p> <p><i>b. Providing for new development, and improvement of the environment, in a way which promotes a sustainable pattern of growth and seeks to mitigate climate change and adapt to its effects.</i></p> <p><i>Footnote 23: The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets; and areas at risk of flooding or coastal change.</i></p>	<p>Landscapes, remains the same.</p>
	<i>National decision-making policies</i>	
	<i>S3. Presumption in favour of sustainable development</i>	
<p><i>11 (page 6). Plans and decisions should apply a presumption in favour of sustainable development... For decision-taking this means:</i></p> <p><i>c) approving development proposals that accord with an up-to-date development plan without delay; or</i></p>	<p><i>1 (page 23, digital page 25). Decisions on development proposals should apply a presumption in favour of sustainable development. This means:</i></p> <p><i>a. Policy S4 in this Framework should be applied when considering development proposals within settlements;</i></p>	<p>The draft NPPF does not address areas or assets of particular importance in the context of decision making. In other words, paragraph 11d(i) of the current NPPF is not</p>

Current NPPF wording	Proposed wording	Comments
<p>d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:</p> <p>i. the application of policies in this Framework that protect <u>areas or assets of particular importance</u> [see footnote 7, above] provides a strong reason for refusing the development proposed; or</p> <p>ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.</p>	<p>b. Outside settlements, policy S5 should be applied; and</p> <p>c. In all locations, development proposals that accord with an up-to-date development plan and also the decision-making policies in this Framework should be approved without delay.</p>	<p>carried forward into the draft NPPF.</p> <p>This is a very significant issue as we rely on paragraph 11d(i) a lot when commenting on planning applications. In this regard, the draft NPPF is a lot weaker than the current NPPF.</p> <p>Also Policy S5, which sets out what development should be permitted outside of settlement boundaries, is a significant cause for concern.</p>
13. Protecting Green Belt land	13. Protecting Green Belt land	
	<i>Plan-making policies</i>	
	GB5: Beneficial Use of Green Belt Land	
<p>151 (page 44). Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. Where Green Belt land is released for development through plan preparation or review, the 'Golden Rules' in paragraph 156 below should apply.</p>	<p>1 (page 60, digital page 62). Green Belt land should provide benefits for communities and nature, which means that the development plan should, at the most appropriate level, set out:</p> <p>a. Proposals for securing improved public access to greenspace within the Green Belt, including for outdoor sport or recreation, allotments and community food production;</p> <p>b. How the Green Belt can contribute to the priorities for nature recovery set out within relevant Local Nature Recovery Strategies;</p> <p>c. Opportunities to support the objectives of the National Forest, England's Community Forests and <u>Protected Landscapes</u>, where these lie wholly or partly within the Green Belt; and</p> <p>d. How the impact of any proposals to remove land from the Green Belt by altering Green Belt boundaries can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.</p>	<p>The explicit reference to Protected Landscapes, in this context, is new and is welcomed.</p>
15. Conserving and enhancing the natural environment	19. Conserving and enhancing the natural environment	
	<i>Plan-making policies</i>	

Current NPPF wording	Proposed wording	Comments
	<i>N1. Identifying environmental opportunities and safeguards.</i>	
<p>187 (page 54). Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <p>a) protecting and enhancing <u>valued landscapes</u>, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);</p> <p>b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;</p> <p>c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;</p> <p>d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;</p> <p>e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and</p> <p>f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.</p>	<p>1 (page 87, digital page 89). Development plans should safeguard and enhance the natural environment, and reflect the wider benefits from natural capital and ecosystem services, by using Local Nature Recovery Strategies, <u>Protected Landscape Management Plans</u>, River Basin Management Plans, National Forest Strategies, Community Forest Plans and other relevant evidence at the most appropriate level to:</p> <p>a. Set out <u>the hierarchy of international, national and locally designated sites and areas of importance for their landscape</u>, geological (including soil) or biodiversity <u>value</u> in the plan area, and identify other features which require particular consideration in managing development due to their environmental value such as chalk streams;</p> <p>b. Identify opportunities for the conservation, enhancement and recovery of landscapes, sensitive waterbodies, habitats and species of principal importance, including through habitat restoration, the use of nature-based solutions, and the creation and strengthening of ecological networks that are more resilient to current and future pressures (including opportunities which exist at a catchment or landscape scale across plan boundaries);</p> <p>c. Steer the location of development, including through site allocations, in ways which utilise land of least environmental value where that would be consistent with other policies in this Framework. This should include limiting the scale and extent of development within <u>protected landscapes</u>, avoiding the use of higher quality agricultural land where land of poorer quality is available and avoiding and minimising harm to designated sites of importance for nature. Areas which could become of particular importance for nature identified in Local Nature Recovery Strategies</p>	<p>The draft NPPF introduces explicit reference to Protected Landscape Management Plans for the first time. This is excellent.</p> <p>The loss of the phrase ‘valued landscapes’ may have implications for landscapes that aren’t officially designated. However, it is not likely to have implications for National Landscapes because these are covered in the 1a (although not explicitly mentioned).</p>

Current NPPF wording	Proposed wording	Comments
	<p>should be taken into account as opportunities to integrate development with environmental restoration, but should not necessarily preclude the allocation of land for development; and</p> <p>d. Set out standards for green infrastructure provision, in a way which complements and/or incorporates those for recreational land (as set out in policy HC1).</p>	
	National decision-making policies	
	N4. Protected Landscapes	
<p>189 (pages 54-55): <i>Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.</i></p>	<p>1 (page 89, digital page 91). <i>Development proposals within Protected Landscapes should be limited in scale and extent and sensitively located and designed to avoid harm to their statutory purposes and special qualities. Substantial weight should be placed on the importance of conserving and enhancing the natural beauty of these areas, and to conserving and enhancing wildlife and cultural heritage in National Parks and the Broads.</i></p> <p>4. <i>Development proposals within the setting of protected landscapes should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.</i></p>	<p>The draft wording replaces 'great weight' with 'substantial weight'. As I understand it, this is to provide consistency in the weight that is applied to various factors in the NPPF. It was never totally clear which level of weight was greater than another. In principle (and on first impressions), I don't mind this change. The sentence about substantial weight should come before the sentence about limiting the scale and extent of development.</p> <p>The phrase 'landscape and scenic beauty' has been replaced with 'natural beauty'. This is something that we have advocated in previous NPPF consultation and support. This is because 'natural beauty' better reflects the purpose of designation. It would be helpful (at least in theory) if the glossary including a definition of natural beauty.</p> <p>The phrase 'which have the highest status of protection in relation to these issues' has been removed. I do not support this change.</p>

Current NPPF wording	Proposed wording	Comments
		<p>The current NPPF refers to development in the setting of protected landscapes being sensitively located and designed. The draft text applies this both to development within protected landscapes and development within their settings. I would support this change.</p> <p>I'm not sure about the additional text relating to the scale and extent of development being limited (i.e. to avoid harm to their statutory purposes and special qualities). I'll need to give this more thought.</p>
<p>190 (page 55). <i>When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development [see footnote 67, below] other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:</i></p> <p><i>a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;</i></p> <p><i>b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and</i></p> <p><i>c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.</i></p>	<p>2 (page 89, digital page 91). <i>Proposals for major development within protected landscapes should only be supported in exceptional circumstances [see footnote 67, below] where it can be demonstrated that the development is in the public interest. To inform a decision about whether exceptional circumstances exist, consideration of such proposals should include an assessment of:</i></p> <p><i>a. The need for the development, including in terms of any national considerations such as maintaining a sufficient supply of minerals, and the impact of permitting it, or refusing it, upon the local economy;</i></p> <p><i>b. The cost of, and scope for, developing outside the designated area, or meeting the need for the development in some other way; and</i></p> <p><i>c. Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which it could be moderated.</i></p>	<p>The current NPPF states 'permission should be refused', whereas the draft NPPF states 'should only be supported'. With the current wording, it was easier to refer to this as a presumption against development, whereas it is not so easy to do that with the draft wording. As such, I would consider the draft wording to be a bit weaker in this regard. I'm not sure if it merits an objection though.</p> <p>I'm not sure why the example of 'maintaining a sufficient supply of minerals' has been added in to (a). This seems unnecessary.</p> <p>The wording relating to exceptional circumstances and public interest has changed. I'll have to give some thought to the implications of this.</p>

Current NPPF wording	Proposed wording	Comments
	<p>3 (page 89, digital page 91). <i>Where, exceptionally, proposals for major development are approved within protected landscapes, steps should be taken to mitigate potential adverse impacts on their special qualities and statutory purposes [see footnote 71, below], including on features such as tranquillity and dark skies.</i></p> <p>Footnote 71: <i>Where significant harm cannot be mitigated, it may be appropriate to consider whether suitable compensation would be acceptable.</i></p>	<p>This is a new paragraph and footnote.</p> <p>In theory, the issue of mitigation should be addressed in part c of the previous paragraph. As such, this addition isn't strictly necessary. However, I think it is better to have some extra reference to mitigation than not. It might be worth recommending that the wording should be changed to 'steps should be taken to avoid and mitigate'.</p> <p>The most interesting aspect of this addition is footnote 71 and the issue of compensation. Personally, I would be very supportive of explicit reference to compensation (although I know some National Landscape teams wouldn't be). However, I don't think that the proposed wording has the right emphasis. Compensation should come into play if it is considered that exceptional circumstances apply. I don't think that it should be part of the justification for demonstrating exceptional circumstances.</p>
17. Facilitating the sustainable use of minerals	11. Facilitating the sustainable use of minerals	
	Plan-making policies	
	M1: Planning for a sufficient supply of minerals	
223 (page 63): <i>In considering proposals for mineral extraction, minerals planning authorities should: a) as far as is practical, provide for the maintenance of landbanks of non-energy minerals from outside National Parks, the Broads, <u>National</u></i>	6 (page 50, digital page 52); ... <i>Where further extraction is necessary, landbanks of non-energy minerals should so far as practical be maintained through sites which lie outside National Parks, the Broads,</i>	The wording, relating to National Landscapes, is almost identical. If anything, the new text is a bit clearer.

Current NPPF wording	Proposed wording	Comments
<i>Landscapes and World Heritage Sites, scheduled monuments and conservation areas ...</i>	<i><u>National Landscapes</u> and designated heritage assets ...</i>	
<i>Annex 2: Glossary</i>	<i>Annex B: Glossary</i>	
<i>Designated rural areas</i> (page 72): <i>National Parks, <u>National Landscapes</u>, areas designated as rural under Section 157 of the Housing Act 1985.</i>	<i>Designated rural areas</i> (page 104, digital page 106): <i>National Parks, <u>National Landscapes</u>, areas designated as rural under Section 157 of the Housing Act 1985 and other areas with a population of 3,000 or less and a population density of two persons or less per hectare.</i>	The text relating to National Landscapes remains unchanged.
<i>National Landscapes</i> (page 75): <i>Areas legally designated as areas of outstanding natural beauty under the National Parks and Access to the Countryside Act 1949 and Countryside and Rights of Way Act 2000.</i>	<i>National Landscapes</i> (page 108, digital page 110): <i>Areas legally designated as areas of outstanding natural beauty under the National Parks and Access to the Countryside Act 1949 and Countryside and Rights of Way Act 2000.</i>	
	<i>Protected landscapes</i> (page 110, digital page 112): <i>Refers to National Parks, the Norfolk and Suffolk Broads and <u>National Landscapes</u> in England.</i>	The phrase 'protected landscapes' isn't used in the current (December 2024) version of the NPPF but is used eight times in the draft NPPF (mostly to replace references to both National Parks and National Landscapes).