

## **NAAONB Response to the Ministry of Housing, Communities and Local Government's consultation on the draft National Planning Policy Framework**

### **Cover note and recommendations**

Thank you for consulting the National Association for Areas of Outstanding Natural Beauty (NAAONB) on the draft National Planning Policy Framework (NPPF).

The NAAONB is the voice of the AONB Partnerships and Conservation Boards and represents the AONB Family network on national issues including policy and advocacy, communications, training, and securing resources. We are delighted to have this opportunity to feed into national planning policy to ensure that it helps to deliver the core purpose of AONB designation – to conserve and enhance the natural beauty of AONBs.

The Government's 25 Year Environment Plan states that AONBs comprise some of our most unique, cherished and valuable natural assets. It also states that the Government will make sure that AONBs continue to be conserved and enhanced. We strongly support this objective. However, as outlined in our consultation response, AONBs are facing unprecedented and unsustainable pressure from development, which is eroding the character, special qualities, and purpose of designation of AONBs.

In order to achieve the aspirations of the Government's 25 Year Environment Plan – and to deliver the statutory purpose of AONB designation – there is a need to strengthen and clarify the level of protection given to AONBs in the NPPF and in supporting guidance. The NPPF review provides a unique opportunity to make this happen.

We believe that the recommendations set out overleaf – and, more fully, in our associated online consultation response - will help the Government to achieve its stated ambition of delivering “the right homes in the right places”.

**The National Association for  
Areas of Outstanding Natural Beauty**

Belmont House, Shrewsbury Business Park  
Shrewsbury, Shropshire, SY2 6LG

07576 321614

[howard.davies@landscapesforlife.org.uk](mailto:howard.davies@landscapesforlife.org.uk)

Twitter @NAAONB

A company limited by guarantee no: 4729800  
Charity Number: 1158871  
Registered office as above

Our full response to the NPPF consultation is provided in the following pages. However, our **key recommendations** can be summarised as follow:

- **Top priority:** Reinstate the principle that protected landscapes have the highest status of protection (paragraph 170, end of the first sentence). This should be supported by guidance which explicitly states that AONBs have equal planning status to National Parks and, at least, equal planning status to Green Belt.
- **Second priority:** Require development in AONBs to be based on specific evidence of a convincing local need arising from within the designated area (paragraph 170, end of the third sentence). This should be supported by guidance which explicitly states that the constraints that apply to development in National Parks should also apply to development in AONBs, given that they have the same planning status.
- **Other recommendations**
  - Give great weight to ‘conserving and enhancing natural beauty’, rather than ‘conserving landscape and scenic beauty’ (paragraph 170, first sentence).
  - Set criteria-based policies for development in – and within the setting of – AONBs and have regard to AONB Management Plans (paragraph 170, new sentence).
  - Apply the major development ‘tests’ in para 170 to plan-making (i.e. site allocations) as well as decision-taking (paragraph 170, fourth sentence of draft NPPF).
  - Simplify paragraph 11, in relation to the designations listed in Footnote 7, providing a more balanced approach to achieving sustainable development.
  - Reinstate reference to Local Wildlife Sites / locally designated sites in the NPPF, including in Footnote 7.
  - Extend the requirement, in paragraph 72, that such developments ‘*should not compromise the protection given to areas or assets of particular importance in this Framework*’ to other relevant paragraphs of the NPPF, including paragraphs 80, 85, 112 and 117.

Thank you, once again, for consulting the NAAONB on the draft NPPF. We look forward to working with you to incorporate our recommendations.

Yours sincerely,



Howard Davies  
Chief Executive

# Full response to the Ministry of Housing, Communities and Local Government's consultation on the draft National Planning Policy Framework

## 1.0 CHAPTER 2: ACHIEVING SUSTAINABLE DEVELOPMENT

### 1.1 Question 2: Do you agree with the changes to the sustainable development objectives and the presumption in favour of sustainable development?

1.1.1 No, the National Association for Areas of Outstanding Natural Beauty (NAAONB) does not agree with the proposed changes to the presumption in favour of sustainable development. In essence, we believe that the proposed changes weaken the level of protection given to AONBs and the other designations that were listed in footnote 9 of paragraph 14 of the 2012 NPPF and which are now listed in footnote 7 of paragraph 11 of the draft NPPF.

1.1.2 Both paragraph 14 and the draft paragraph 11 have a presumption in favour of approving development unless certain, restrictive policies apply. This weighting in favour of approving development is known as the 'tilted balance'. The wording of paragraph 14 of the 2012 NPPF has been interpreted in two different ways in case law, in relation to this 'tilted balance'. This can be summarised as either

- (a) the 'tilted balance' is disapplied where there is a potential harm which requires consideration under one of the restrictive policies<sup>1</sup>, or
- (b) the 'tilted balance' is only disapplied if one of the restricted policies requires that the permission should be refused.

1.1.3 We believe that (b) is a misinterpretation of the current policy. Whilst we encourage the re-wording of the NPPF to address this issue, we do not believe that the revised wording proposed in paragraph 11 provides a suitable solution. As mentioned above, we believe that the new wording actually weakens the level of protection given to AONBs and other designations.

1.1.4 Paragraph 14 of the 2012 NPPF limits development where '*specific policies in this Framework indicate development should be **restricted***'. In contrast, paragraph 11 of the draft NPPF limits development where '*the application of policies in this Framework that protect areas or assets of particular importance provides a strong [or clear] reason for*':

- (i) '**restricting** the overall scale, type or distribution of development in the plan area' (in the case of 'plan-making'); or
- (ii) '**refusing** the development proposed' (in the case of 'decision-taking').

---

<sup>1</sup> The policies covered by Footnote 9 of the 2012 NPPF and Footnote 7 of the draft NPPF.

- 1.1.5 So, for example, paragraph 115 of the 2012 NPPF (and the first half of paragraph 170 of the draft NPPF) provides a reason for **restricting** development (e.g. the need to give *'great weight'* to conserving landscape and scenic beauty in AONBs and – in the case of the draft NPPF - the need for development in these areas to be limited). However, it does not necessarily provide an explicit reason for **refusing** development. As such, it could be interpreted that the draft NPPF is explicitly supporting the granting of planning permission for all non-major development proposals in AONBs, regardless of impact, in the circumstances outlined in section (d) of paragraph 11. The proposed wording of paragraph 11 would, therefore, be a perverse distortion of protected landscape policy. The extent to which development is permitted in AONBs should not be dependent on an up-to-date development plan being in place. Great weight should be given regardless of the status of the development plan.
- 1.1.6 The requirement for the policies relevant to footnote 7 to provide a 'strong' or 'clear' reason for restricting or refusing development should be removed as we consider this requirement to be unnecessarily onerous. We consider that all planning reasons have to be 'strong' and 'clear', so imposing this requirement specifically for footnote 7 policies is superfluous and capable of misinterpretation in relation to considerations which are often subjective rather than clear cut. The requirement, in paragraph 11b(i), for the footnote 7 policies to provide a strong reason for *'restricting the overall scale, type, or distribution of a development in the plan area'* also overcomplicates the requirements of paragraph 11 and the meaning of the presumption in favour of sustainable development. As such, the proposed wording in paragraph 11 is likely to have multiple interpretations.
- 1.1.7 We believe that the requirements of paragraph 11 and the presumption in favour of sustainable development should be simplified and clarified in order to reduce ambiguity and misinterpretation. To achieve this, we recommend that paragraph 11 of the draft NPPF should be amended to make it clear that the 'tilted balance' (i.e. the scales being loaded in favour of approving development) should not apply for development affecting those designations listed in footnote 7 of the draft NPPF. This should also provide a more appropriate balance between the three overarching objectives of sustainable development, in line with paragraph 8 of the draft NPPF.
- 1.1.8 On this basis, **we recommended that sections b(i) and d(i) of paragraph 11 should be changed to:**
- ***policies in this Framework, that protect areas or assets of particular importance, apply<sup>7</sup>.***
- 1.1.9 We support the addition of the following sites / designations into footnote 7:
- irreplaceable habitat including ancient woodland, and
  - aged or veteran trees.

1.1.10 However, we are concerned that footnote 7 currently omits a number of key designations, including Local Wildlife Sites.

1.1.11 **We recommend that Local Wildlife Sites should be added to the list of footnote 7 designations<sup>2</sup>. Furthermore, we recommend that the designations listed in footnote 7 should remain as examples, as in footnote 9 of the 2012 NPPF, rather than as a definitive list, so as not to explicitly exclude other relevant designations.**

## 2.0 CHAPTER 3. PLAN-MAKING

### 2.1 Question 6: Do you have any other comments on the text of Chapter 3?

#### 2.1.1 Paragraph 24

2.1.1.1 As indicated in our response to Question 34, the NAAONB believes that development in AONBs should be based on specific evidence of a convincing local need arising from within the designated area. To align the over-arching principles of plan-making with this aspiration, **we recommend that that the following sentence should be added to the end of paragraph 24 of the draft NPPF:**

- **Where a Strategic Plan covers all, or part of, an AONB, National Park and/or the Broads, the Strategic Plan (and any review of policies and/or housing needs) should make it clear that development within these designated areas should focus on addressing demonstrable local need arising from within the designated area.**

#### 2.1.2 Paragraph 27

2.1.2.1 AONBs are statutory designations that cover a large proportion of the land in England and Wales, particularly in high growth areas, such as the south-east of England. As outlined in response to Question 36, AONBs, particularly in these high growth areas, are facing increasing development pressures. These pressures risk eroding the character, special qualities and purposes of AONB designation.

2.1.2.2 On this basis, **we recommend that AONB Conservation Boards and AONB Partnerships should be included within the list of bodies in paragraph 27 of the draft NPPF**, which strategic plan-making authorities should engage with when seeking to identify strategic matters which they need to address in their plans.

---

<sup>2</sup> The 2012 NPPF included several references to Local Wildlife Sites (or their equivalent, such as 'locally designated sites'), for example paragraphs 113 and 119 and in the Glossary. Unfortunately, these references have been removed in the draft NPPF. These references should be reinstated in relevant paragraphs of the draft NPPF, for example paragraph 173 and the Glossary, with Local Wildlife Sites being considered within the context of the hierarchy of nature conservation sites. This would then enable reference to Local Wildlife Sites in Footnote 7 of the draft NPPF. We support the more comprehensive responses of other consultees, such as Wildlife and Countryside Link, on this issue.

### **3.0 CHAPTER 5: DELIVERING A WIDE CHOICE OF HIGH QUALITY HOMES**

#### **3.1 Question 13: Do you agree with the new policy on exception sites for entry-level homes?**

3.1.1 Although the NAAONB doesn't take a view on the development of entry level exception sites, in the context of the NPPF consultation, per se, we welcome the requirement, in paragraph 72, that such developments '*should not compromise the protection given to areas or assets of particular importance in this Framework*' – including AONBs - as defined in footnote 27 and, by extension, in footnote 7. **We recommend that this requirement should be extended to other relevant paragraphs of the NPPF, including paragraph 80 (rural housing), 85 (rural economy), 112 (high quality communications) and 117 (making effective use of land).**

### **4.0 CHAPTER 15. CONSERVING AND ENHANCING THE NATURAL ENVIRONMENT**

#### **4.1 Question 34: Do you agree with the approach to clarifying and strengthening protection for areas of particular environmental importance in the context of the 25 Year Environment Plan and national infrastructure requirements, including the level of protection for ancient woodland and aged or veteran trees?**

##### **4.1.1 Paragraph 170 of the draft NPPF**

4.1.1.1 The NAAONB cautiously welcomes the new text in paragraph 170 of the draft NPPF, which clarifies that development within Areas of Outstanding Natural Beauty and National Parks should be limited.

4.1.1.2 However, we recommend that some amendments are made to this new text, as outlined below. We also have a number of concerns about the wider proposed changes in paragraph 170, with regards to their implications for AONBs. In addition, we would like to recommend some further amendments to enhance the level of protection give to AONBs and to bring NPPF policies relating to AONBs more in line with relevant legislation - such as the Countryside and Rights of Way (CRoW) Act 2000 - and relevant guidance from Government, Natural England and Defra.

##### **4.1.2 Paragraph 170, sentence 1**

4.1.2.1 Whilst we welcome the continued emphasis on giving 'great weight', the NAAONB objects to the removal of the following text:

- '*... which have the highest status of protection.*'

4.1.2.2 We believe that this text helps to clarify that, in planning terms, AONBs have equivalent status to National Parks. The Government's Planning Practice Guidance

(PPG) should explicitly state this. It also clarifies the high planning status of the collective family of protected landscapes. The removal of this text potentially risks undermining this planning status. This is a vitally important issue, particularly at a time when AONBs are facing unprecedented pressure from housing (and other) development. This development pressure risks eroding the character, special qualities and purposes of designation of AONB and other designated landscapes.

4.1.2.3 To ensure AONBs and other protected landscape retain the highest level of protection (including in comparison to other designations), **we recommend that an amended version of this text should be re-incorporated into the first sentence of paragraph 170, as follows:**

- ***... with these designations having the highest status of protection.***

4.1.2.4 The re-insertion of this text is our highest priority in our response to the NPPF consultation.

4.2.2.5 We do not recommend the re-insertion of '*...in relation to landscape and scenic beauty*'. This is because we believe that this highest status of protection should apply when comparing the level of protection given to these designated landscapes with that given to non-landscape designations, such as Green Belt. AONBs are included in footnote 7 to paragraph 11, with equivalent status to Green Belts and the other environmental assets listed. However, there are many examples of Green Belt designation being given a higher level of protection – in both plan-making and decision-taking – than AONB designation. Re-instating the wording in the way that we have suggested should help to ensure that AONBs are given at least equal weight to Green Belt. It should also help to ensure that AONBs are not seen as appropriate locations for major development and that any development accords with their statutory purposes. The PPG should re-iterate these points.

4.1.2.6 The primary purpose of AONB designation, as defined in the Countryside and Rights of Way Act 2000, is to conserve and enhance the natural beauty of the AONB. As such, it would be sensible for paragraph 170 to use this terminology in its opening sentence. The term 'natural beauty' covers a wide range of issues, including landform and geology, plants and animals, landscape features and the rich history of human settlement over the ages<sup>3</sup>. Landscape and scenic beauty are, in effect, subsets of 'natural beauty' and, as such, do not merit a separate reference in the wording of this NPPF policy, especially as they are not part of the statutory purpose of AONB designation.

4.1.2.7 Based on the points raised above, **we recommend that the wording of the first sentence should be changed to**

---

<sup>3</sup> Areas of Outstanding Natural Beauty: A Guide for AONB Partnership members, Countryside Commission 2001

- ***Great weight should be given to conserving and enhancing the natural beauty of National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection.***

4.1.2.7 This revised wording should be supported by additional guidance – including the PPG - on the meaning of ‘natural beauty’. As indicated above, paragraph 170 should make direct reference to the designated area Management Plans, to ensure that they are given due recognition as an important material consideration. The PPG should direct decision-makers to these Plans for a definition of what constitutes natural beauty in each protected landscape.

#### **4.1.3 Paragraph 170, sentence 2**

4.1.3.1 We acknowledge that wildlife and cultural heritage are an explicit component of the purposes of designation for National Parks and the Broads. However, wildlife and cultural heritage are also key considerations in the designation of AONBs. As such, we believe that the conservation of wildlife and cultural heritage should be given great weight in AONBs, as well as in National Parks and the Broads. **We recommend that the second sentence in paragraph 170 should therefore be changed to:**

- ***The conservation of wildlife and cultural heritage are important considerations in all of these areas and should also be given great weight.***

#### **4.1.4 Paragraph 170, sentence 3**

4.1.4.1 As indicated above, in our opening response to Question 34, the NAAONB cautiously welcomes the introduction of this new sentence, which states that ‘*the scale and extent of development within these designated areas should be limited*’. However, we recommend that the sentence should be amended, as outlined below.

4.1.4.2 There has been a significant increase in the amount and scale of development permitted in AONBs in recent years, as evidenced in the 2017 CPRE/NAAONB research report: Independent Review of Housing in England’s AONBs. For example, the report highlights that the number of applications for housing schemes comprising more than 10 units has increased by 105% between 2012/2013 and 2016/2017.

4.1.4.3 As the 2010 Circular on National Parks makes clear, National Parks are not suitable locations for unrestricted housing and housing should be focused on meeting affordable housing requirements, supporting local employment opportunities and key services. Given that AONBs have the same planning status as National Parks, these principles should also apply to AONBs. The expectation that development in these designated areas should be primarily for local needs, with general housing needs met outside these areas, should be clearly stated in the NPPF.

4.1.4.4 On this basis, **we recommend that the wording of this sentence should be changed to**

- ***The scale and extent of development within these designated areas should be limited and be based on specific evidence of a convincing local need arising from within the designated area.***

4.1.4.5 The words ‘scale’, ‘extent’ and ‘limited’, as proposed in the new sentence, will inevitably be subject to a wide range of interpretations. The PPG should provide clarity on this issue. The PPG should also

- explicitly state that the constraints that apply to development in National Parks should also apply to development in AONBs, given that they have the same planning status, and
- state that any development in these areas should be of the highest design quality and reflect and enhance local landscape character.

#### **4.1.5 Paragraph 170, sentence 4**

4.1.5.1 The inclusion of a definition of major development in ‘Annex 2: Glossary’ of the draft NPPF has significant implications for AONBs and other protected landscapes. We comment on this issue in response to Question 43.

4.1.5.2 At present, the text on major development just relates to planning applications and the granting of planning permission. However, we believe that the major development text should apply at the plan-making stage, when the scale and location of development is being decided, as well as (i.e. not instead of) the planning application stage. In this way, the NPPF would ensure that a proportion of major development proposals can be ruled out at the ‘plan-making’ stage. However, even if the major development text is applied at the plan-making stage, it is still important that it is applied at the planning application stage as well. This is because many of the factors affecting the potential impact of a development on an AONB, such as design and layout, only emerge at the planning application stage. So, although applying the major development tests at the plan-making stage should rule out some (but not all) major development, planning applications for major development on allocated sites might still have unacceptable impacts that it wouldn’t have been possible to predict at the plan-making stage.

4.1.5.3 On this basis, **we recommend that the wording of this sentence should be changed to**

- ***Planning permission should be refused – and allocations avoided - for major development, other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. Consideration of major development at the plan-making and decision-taking stages should include an assessment of ...***

4.1.5.4 The requirement for this policy to be applied at both the plan-making stage and at the planning application stage should also be addressed in supporting guidance,

including the PPG. The supporting guidance should also clarify what is meant by 'exceptional circumstances' and 'in the public interest'. For example, it should make clear that national and local (district-wide) demand for housing is the 'norm' and, as such, does not constitute 'exceptional circumstances'.

4.1.5.5 To align with our recommendation that '*development in AONBs should be based on specific evidence of a convincing local need arising from within the designated area*', we also recommend that criterium (a) is re-worded as follows:

**(a) *evidence of the need for the development at the time the decision is to be taken, including in terms of any national considerations ...***

#### **4.1.6 Paragraph 170, suggested additional text relating to the setting of AONBs**

4.1.6.1 An important consideration in conserving and enhancing the natural beauty of AONBs is the potential impact of developments that are outside an AONB boundary but still 'within the setting' of the AONB.

4.1.6.2 The only (indirect) reference to this issue in the current (2012) NPPF is paragraph 113, which requires local planning authorities to '*set criteria based policies against which proposals for any development on or **affecting** protected ... landscape areas will be judged*'. In an AONB context, '*affecting*' equates to 'within the setting of'.

4.1.6.3 However, with this paragraph now being removed in the draft NPPF, the NPPF provides no policies that address development within the setting of AONBs (other than a very tenuous link through the requirement to give '*great weight ... to conserving landscape and scenic beauty* in [protected landscapes]').

4.1.6.4 **We recommend that paragraph 113 should be reinstated into the NPPF.**

4.1.6.5 However, if this does not happen, **we recommend the inclusion of an additional sentence in paragraph 170 as follows:**

- ***Local planning authorities should set criteria-based policies against which proposals for any development in – and within the setting of – these protected landscapes will be judged, having regard to the relevant Management Plan.***

4.1.6.6 On this basis, the criteria-based approach - and the requirement to have regard to the relevant Management Plan - would relate to both development in the AONB and development in the setting of the AONB.

4.1.6.7 The new text should be supported by additional guidance in the PPG, which explains the meaning of 'within the setting of'. This should clarify that 'within the setting of' does not just relate to visual impact but also relates to issues such as biodiversity, water corridors, the impact of increased traffic, light pollution (including impacts on 'dark skies') and noise (including impacts on 'tranquillity').

#### **4.1.7 Summary of revised wording for paragraph 170.**

4.1.7.1 Based on the comments made above, we recommend that the wording of paragraph 170 should now be as follows. The significance of major development seems sufficiently great to warrant a separate paragraph, as in the 2012 NPPF. Re-instating two paragraphs would also allow for an appropriate level of detail in each section.

- ***Great weight should be given to conserving and enhancing natural beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection. The conservation of wildlife and cultural heritage are important considerations in all of these areas and should also be given great weight. The scale and extent of development within these designated areas should be limited and based on specific evidence of a convincing local need arising from within the designated area. Local planning authorities should set criteria-based policies against which proposals for any development in – and within the setting of – these protected landscapes will be judged, having regard to the relevant Management Plan.***
  
- ***Planning permission should be refused – and allocations avoided - for major development, other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. Consideration of major development at the plan-making and decision-taking stages should include an assessment of:***
  - a) evidence of the need for the development at the time the decision is to be taken, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;***
  - b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and***
  - c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated***

**4.2 Question 35. Do you have any other comments on the text of Chapter 15?**

**4.2.1 Paragraph 178**

4.2.1.1 The NAAONB supports paragraph 178 of the draft NPPF, particularly the requirements relating to tranquil areas and intrinsically dark landscapes, as tranquillity and dark skies are key features of AONBs. In many areas, AONBs are the most significant locations for tranquil areas and dark skies. As such, protecting these features is particularly important in AONBs.

**5.0 GLOSSARY**

**5.1 Question 43. Do you have any comments on the Glossary?**

- 5.1.1 As indicated in response to Question 34, the NAAONB believes that the inclusion of a definition of ‘major development’ has significant implications for AONBs.
- 5.1.2 The definition of major development in the Glossary of the draft NPPF originates from the Town and Country Planning (Development Management Procedure) Order 2015, which is a consolidation of previous Orders. As such, this definition of major development pre-dates the original NPPF, which came into force in 2012.
- 5.1.3 However, the definition of major development provided in the 2015 Order has not, to-date, been applied to major developments in AONBs, in the context of paragraph 116 of the current NPPF (paragraph 170 in the draft NPPF). Indeed, applying this definition of major development to AONBs, under paragraph 116 of the NPPF, conflicts with UK case law.
- 5.1.4 In UK case law, the meaning of major development, in the context of paragraph 116 of the NPPF, has been deemed to be a ‘*matter of planning judgement*’, taking into account the potential impact that the development may have on the AONB by reason of its scale, character or nature.
- 5.1.5 On the basis of current UK case law, it can be argued that a housing development of fewer than 10 homes in an AONB might be deemed as major development if it has potential to have a serious adverse impact by reason of its scale, character or nature. The same argument could potentially apply to non-residential development of less than 1,000 square metres or sites of less than one hectare. However, applying the definition of major development in the Glossary of the draft NPPF, as it is currently worded, to AONBs would not provide this flexibility.
- 5.1.6 On the other hand, many AONBs have experienced local authorities using the current ambiguity to avoid classing much larger housing developments as major development. Applying the Annex 2 definition could actually be helpful in these circumstances, ensuring that these larger developments that can significantly impact on AONBs have to meet the exceptional circumstances test.
- 5.1.7 On balance, the NAAONB believes that, whilst the definition of major development in Annex 2 of the revised NPPF provides a useful threshold, it should not be allowed to prevent smaller scale developments in AONBs being considered as major development if they are deemed to have the potential to have a serious adverse impact on the AONB by reason of their scale, character or nature.
- 5.1.8 As such, **we recommend that the definition of major development should be retained in Annex 2 of the revised NPPF, but with the addition of the following sentence:**
- ***In the context of paragraph 170, relating to major developments in National Parks, the Broads and Areas of Outstanding Natural Beauty, smaller scale developments may be considered to be major development if they are deemed***

***to have the potential to have a serious adverse impact by reason of their scale, character or nature.***

5.1.9 The Planning Practice Guidance (PPG) should state that AONB Management Plans may provide additional guidance on major developments in AONBs.

5.1.10 On a separate point, the figure of 1,000m<sup>2</sup>, in relation to non-residential development should be changed to 1,000 square metres, to reflect the wording of the 2015 Order and to avoid ambiguity (i.e. to avoid 1,000m<sup>2</sup> being interpreted as 1,000m x 1,000m = 1,000,000 square metres = 1 square kilometre, rather than the intended meaning of, for example, 31.62m x 31.62m = 1,000 square metres).

**NAAONB  
May 2018**