

The Moorland Association (MA) welcomes the opportunity to respond to the Government's consultation on proposed changes to the National Planning Policy Framework (NPPF).

The NPPF is the national policy “rulebook” that guides local plan-making and day-to-day planning decisions in England, and therefore has direct implications for the long-term management of moorland landscapes, rural communities and businesses, and the protection and enhancement of the natural environment.

Given the breadth of the consultation, the MA has focused its response on those questions most relevant to our members’ interests and to effective, workable planning outcomes in upland and rural areas. We are responding to the following questions: 1-3, 34-39, 42-47, 85-87, 96-98 and 179-184.

1) Do you have any views on how statutory National Development Management Policies could be introduced in the most effective manner, should a future decision be made to progress these?

The Moorland Association has no substantive comments on the introduction and welcomes the stated aim of providing a clear national policy framework for both plan-making and decision-taking.

However, we suggest two improvements to ensure the introduction better reflects material planning considerations in upland and rural areas:

1. Explicitly acknowledge climate adaptation risks beyond flooding, including wildfire and smoke impacts. In upland and moorland landscapes, wildfire is an increasingly material risk affecting public safety, air quality, water, carbon stores (including peat), biodiversity and infrastructure access. The introduction should flag that climate adaptation in planning extends to these risks, not solely flood-related impacts.
2. Clarify that “environmental improvement” includes land management functions that underpin resilience, including maintenance of habitat condition, access and operational capability for emergency response, and measures that reduce fuel loads and ignition risk where appropriate. These are relevant to both plan-making evidence and decision-taking.

Overall, MA supports the introduction’s direction, but recommends these additions to ensure it sets the right context for consistent application in rural and protected landscape settings.

2) Do you agree with the new format and structure of the draft Framework which comprises separate plan-making policies and national decision-making policies?

Partly agree.

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

1. Greater clarity is welcome, but only if the split strengthens (not weakens) delivery on the ground.

Separating plan-making from decision-taking could help reduce confusion about what must be done in plans versus what should be applied to individual proposals. That said, MA members’ experience is that the most damaging outcomes often arise where decision-making is treated as a “box-tick” exercise and the plan context is sidelined. The new structure should explicitly prevent that.

2. Avoid “policy dilution” through separation—especially for climate adaptation, wildfire risk, and the natural environment.

MA’s core concern is that issues such as wildfire risk, smoke impacts, peat/soil vulnerability, hydrology and habitat condition can be treated as secondary considerations unless the decision-making policies make them unmistakably material and consistently weighted. Where these matters are dealt with in plan-making only, there is a risk that decisions (including permitted development / exceptions) proceed without robust, site-specific safeguards.

3. Stronger cross-referencing is essential.

If the Framework is split, Government should ensure:

1. every decision-making policy that depends on plan evidence signposts clearly to the relevant plan-making requirements, and
2. decision-making policies cannot be applied in isolation where the plan is absent, out of date, or silent on a key risk (eg. wildfire).

4. The structure must still allow legitimate local differentiation in upland and protected landscape contexts.

National decision-making policies should provide consistent baselines, but plans must retain scope to reflect the distinct characteristics of upland areas, protected landscapes and their setting - particularly where risks and constraints are materially different (eg. access limitations for fire and rescue, water availability, steep terrain, deep peat, sensitive designations, cumulative impacts on habitat networks).

5. If statutory National Development Management Policies (NDMPs) are the direction of travel, this split must not pre-emptively narrow local plan scope.

MA's concern is that a strict "no duplication" approach could unintentionally prevent plans from setting place-specific safeguards (e.g., wildfire resilience measures, fuel and access management expectations, smoke-sensitive receptors, peat risk considerations) that are necessary for effective implementation.

Practical recommendations to make the new structure work:

1. Include a clear "how to use this Framework" gateway early on, with worked examples showing how plan-making and decision-taking policies interact for:
(i) development in/near protected landscapes; and (ii) development in wildfire-risk locations.
2. Make sure the decision-making section explicitly requires consideration of climate adaptation and wildfire risk where relevant, even if the local plan evidence is incomplete or dated.
3. Provide stronger signposting so that plan-making policies cannot be bypassed at application stage.
4. Ensure accompanying guidance (PPG or equivalent) is updated at the same time, to avoid uncertainty and inconsistent interpretation.

Summary. The MA supports the intention to improve clarity, but can only agree in part unless the split is accompanied by robust cross-referencing and explicit safeguards to ensure that climate adaptation (including wildfire) and the natural environment are consistently protected in decision-taking, not just plan-making.

3) Do you agree with the proposed set of annexes to be incorporated into the draft Framework?
Partly agree

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

The MA supports the direction of travel, but only in part unless annexes are tightly defined, their status is made explicit, and the framework avoids pushing outcome-critical matters into annexes where they are harder to find and more inconsistently applied.

1. In principle, the consolidation is helpful.

The MA supports the use of annexes where they *genuinely improve clarity and usability* by bringing together material that decision-makers and applicants routinely need, and by reducing reliance on scattered statements and add-ons.

2. Annexes must not become a “back door” for substantive policy change.

Annexes should be clearly limited to:

1. definitional / methodological material,
2. lists of superseded statements (where relevant),
3. technical or procedural detail that supports the main policy text. Where an annex changes outcomes on the ground, the operative policy should be in the main body and clearly consulted on as such.

3. Make the status and weight of annex content explicit.

To avoid inconsistent interpretation, each annex should state plainly whether it is:

1. policy,
2. methodology / inputs, or
3. supporting reference material, and how it should be used in plan-making and decision-taking.

4. Ensure key rural/upland risks are not lost between annexes and guidance.

From an upland and protected landscape perspective, The MA's priority is that nationally significant risks and constraints (particularly climate adaptation issues such as wildfire risk and smoke impacts, alongside peat/soil and hydrological sensitivity) remain easy to locate and consistently applied. If annexes are used to carry information requirements or technical “inputs”, they should explicitly signpost where these risks must be assessed and how proportionality should work for smaller schemes.

5. Keep annexes maintained alongside PPG and avoid duplication/conflict.

If annexes are expanded, the government should commit to updating PPG in parallel and to avoiding parallel “rules” that drift apart over time (a common cause of confusion for applicants and LPAs).

34) Do you agree with the proposed approach to setting a spatial strategy in development plans?

Partly agree

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

The Moorland Association supports the principle of requiring plans to include a clear spatial strategy, including clearer settlement boundaries/criteria, because this should improve predictability and reduce ad-hoc decision making.

However, the MA can only partly agree unless the policy is strengthened to ensure spatial strategies properly reflect rural and upland realities, protected landscape purposes, and climate adaptation risks (including wildfire).

1. Spatial strategy must be genuinely “place-based”, not just housing distribution

A spatial strategy should be more than a map of where growth goes. It should explicitly integrate:

1. landscape sensitivity (including protected landscapes and their setting),
2. access constraints and infrastructure capacity (including emergency response access), and
3. climate adaptation risks, including wildfire and smoke impacts, peat/soil vulnerability and water-related impacts.

Without this, the approach risks steering development into locations that look “available” on paper but are operationally and environmentally inappropriate.

2. Require plans to identify “high-risk / high-sensitivity” areas early

MA recommends policy S2 (and associated guidance) explicitly expects plans to identify areas where development should be avoided or tightly managed due to:

1. wildfire likelihood and consequence (including where evacuation, access and response times are limiting),
2. peatland/organic soil sensitivity and hydrological risk, and
3. cumulative landscape/ecological effects. This would reduce conflict at application stage and support more consistent decisions.

3. **Avoid perverse outcomes from boundary-setting**
Clear settlement boundaries can help, but in rural areas they can also create edge pressures and “boundary gaming” unless the policy requires:
 1. transparent criteria,
 2. consistent application across the authority area, and
 3. explicit consideration of landscape character and settlement-edge function (including green buffers, access land, and ecological networks).
4. **Ensure compatibility with protected landscapes duties and objectives**
Where plans cover, or affect, protected landscapes (and their setting), the spatial strategy should be required to demonstrate how it will conserve and enhance those areas while meeting development needs in the most suitable locations.

In summary. The MA supports the direction of travel (a clear spatial strategy is necessary) but the approach should be strengthened so it clearly embeds upland/protected landscape constraints and climate adaptation (including wildfire risk) as core determinants of spatial strategy, not optional add-ons.

35) Do you agree with the proposed definition of settlements in the glossary?

Partly agree

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

The Moorland Association supports the principle of a clearer national definition of “settlement” because inconsistent interpretation is a frequent source of uncertainty in rural areas. A clearer definition could improve plan-making and decision-taking, and reduce appeal risk.

However, the MA can only partly agree unless the definition and accompanying policy:

1. **Avoids “one-size-fits-all” outcomes in rural and upland contexts**
In many upland areas, development patterns are dispersed and service provision differs significantly from lowland towns. A rigid definition risks classifying traditional clusters, hamlets, and working land-based communities as “open countryside” even where they function as settlements in practice.
2. **Recognises functional characteristics, not just scale**
The MA recommends the definition (and guidance) use functional criteria alongside size, such as:
 1. presence of a recognisable built-up area and coherent form,
 2. level of day-to-day services (even if limited),
 3. public transport/access realities,
 4. relationship to local employment (including land-based businesses),
 5. capacity to accommodate change without harmful landscape impacts.
3. **Does not unintentionally penalise land management and rural business needs**
A strict definition can push essential development for farming, moorland management, conservation, wildfire mitigation infrastructure, and rural diversification into a “non-settlement” category, where it becomes harder to justify despite clear operational need. The Framework should ensure that necessary development supporting rural land management and climate resilience is not blocked simply because it sits outside a narrowly defined “settlement”.

4. **Works alongside protected landscape policy and landscape character**

In or near protected landscapes (and their setting), the settlement definition should not be used to justify growth patterns that harm landscape character. Plans should still be required to demonstrate that settlement-based growth locations are environmentally appropriate and resilient.

Recommended wording approach. The MA would support a definition that provides national consistency but explicitly allows Local Plans to refine settlement identification through transparent criteria reflecting local geography, accessibility, and landscape sensitivity.

In summary the MA supports a clearer definition in principle, but it must be flexible enough to reflect rural/upland settlement patterns and avoid unintended constraints on essential land-based and climate resilience development.

36) Do you agree with the revised approach to the presumption in favour of sustainable development?

Partly agree

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

The Moorland Association recognises the intention behind the revised approach: to make the presumption clearer and more “rules-based” by linking decisions directly to location-based policies (S4 within settlements and S5 outside settlements), rather than relying on a more generic “tilted balance” trigger.

However, The MA can only partly agree unless the revised presumption is strengthened to avoid unintended consequences for rural areas, protected landscapes, and climate adaptation risks (including wildfire).

1. Clarity is improved, but only if safeguards are consistently “front and centre” in decision-taking

A more locational presumption can reduce ambiguity, but it also risks becoming a default approval mechanism unless the Framework makes it unambiguous that material constraints (eg. protected landscape purposes, peat/soil vulnerability, wildfire risk and smoke impacts, access for emergency response, hydrology) must be properly assessed and weighted at application stage - not just noted in plan-making.

2. Avoid creating a perverse incentive to approve poorly-evidenced proposals where plan evidence is weak or out of date

If the presumption becomes “approve unless...” in a rules-based way, it is essential that the “unless” includes clear requirements for proportionate but robust evidence where key risks are present (eg. wildfire exposure, likely smoke pathways, deep peat/organic soils, water quality impacts). Otherwise, the approach could increase dispute and appeals rather than reduce them.

3. Ensure the approach does not disadvantage necessary rural land-management and resilience development

The MA supports a selective approach outside settlements, but the Framework must ensure that land management infrastructure and operations that underpin climate resilience and environmental delivery (including wildfire prevention/mitigation measures, access and water provision for firefighting where appropriate, and essential rural enterprise development) are not unintentionally made harder to deliver because they are treated as “exceptions” rather than recognised as part of sustainable development in rural contexts.

4. **Explicitly connect the presumption to climate adaptation duties, not only climate mitigation**

In upland and moorland areas, adaptation is often the immediate planning issue (wildfire risk, smoke and public health, erosion/hydrology impacts, constrained access). The revised presumption should clearly signal that “sustainable development” in practice includes resilience and risk reduction, not simply directing development to locations.

Recommended revisions the MA would support

1. Add clearer wording to ensure that where wildfire risk (and smoke impacts) or peat/soil/hydrological sensitivity is relevant, decision-makers must apply a precautionary, evidence-led approach (including proportionate mitigation and management requirements).
2. Make explicit that the locational presumption does not diminish protections and duties applying in protected landscapes and their setting, and should not be applied mechanistically.
3. Ensure the policy framework and guidance give practical examples of how S3 interacts with S4/S5 when key risks/constraints are present.

In summary, the MA supports the aim of making the presumption clearer and more genuinely “sustainable” by tying it to location-based policies, but only partly agrees unless the revised approach is strengthened to ensure environmental constraints and climate adaptation risks (particularly wildfire) are consistently and transparently addressed in decision-making.

37) Do you agree to the proposed approach to development within settlements?

Partly agree

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

The Moorland Association supports the objective of providing greater certainty and making it clear that, in principle, appropriate development within settlements should be supported - particularly on suitable previously developed (brownfield) land. We also recognise the intent of framing S4 (and S5) so that decisions must still be taken against the full suite of national decision-making policies, rather than a narrow “substantial harm” test.

To work as intended, S4 needs clear “guardrails” so that support for appropriate development within settlements does not translate into routine loss of settlement-edge green infrastructure or weaker application of protections that still apply through other policies (including for protected landscapes and their setting).

However, the MA can only partly agree unless the approach is strengthened to avoid unintended consequences for settlement-edge land, green infrastructure, and environmental resilience.

1) Avoid unintended loss of “valued” undeveloped land within settlements

Policy S4 supports development across settlements subject to exceptions, including protection for previously undeveloped land “of value”. The MA supports this safeguard, but recommends clearer criteria and stronger signposting so that important land is not treated as a residual “easy win” simply because it falls inside a settlement boundary.

In particular, the policy should explicitly capture (or signpost to):

1. green buffers and settlement-edge land performing a landscape setting function (especially near protected landscapes),
2. habitat networks / Local Nature Recovery Strategy priorities, and
3. land that is important for flood storage, water management, or urban cooling.

2) Ensure the policy doesn’t drive pressure onto the settlement edge in rural/upland settings

In many rural market towns and villages (including those close to moorland and protected landscapes), the “settlement” may be small, and the most available land is often greenfield at the

edge. A strong in-principle presumption needs equally strong guardrails so that growth is steered to the right places *within* settlements and does not erode landscape character and nature recovery opportunities.

3) Clarify how S4 interacts with protected landscape duties and “important policies elsewhere”

S4 includes exceptions where other important policies direct refusal. The MA supports this, but the Framework should make the interaction clearer in practice - particularly where proposals within settlements could still have significant effects on:

1. protected landscapes and their setting,
2. designated sites, irreplaceable habitats, and biodiversity networks, and
3. climate adaptation and public safety risks that can arise at settlement edges in rural/upland areas (eg. wildfire exposure, emergency access and response constraints).

Where S4 relies on the “important policies elsewhere” exception, decisions should briefly set out which policy is engaged, the pathway of impact and why any residual harm is (or is not) acceptable.

4) Keep the “allocated land” exception robust

The MA supports the exception where proposals conflict with land allocated for specific purposes (eg. employment land, community uses). In rural settlements, loss of such sites can undermine resilience and reduce options for local jobs and services.

Suggested refinements the MA would support

1. Tighten and define “previously undeveloped land of value” so it is consistently applied (with examples), and explicitly includes green infrastructure/habitat connectivity and climate resilience functions.
2. Add a clear expectation that development within settlements should safeguard and, where possible, enhance green infrastructure functions (nature recovery, water management, urban cooling and landscape setting), with particular care at settlement edges and in/near protected landscapes.
3. Strengthen signposting so decision-makers consistently apply the “important policies elsewhere” exception, rather than treating S4 as a default override.

In summary, the MA supports the intent to provide clarity and encourage sustainable development within settlements, but only partly agrees unless safeguards for valued undeveloped land, settlement-edge impacts, and environmental resilience are made clearer and more consistently enforceable

38) Do you agree to the proposed approach to development outside settlements?

Partly agree

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

The Moorland Association supports the intention behind policy S5: a more selective approach outside settlements to avoid unsustainable patterns of growth and conserve rural character, while still enabling genuinely necessary rural development.

However, MA can only partly agree unless the policy is tightened to avoid unintended consequences for upland landscapes, climate resilience (including wildfire risk), and rural communities.

The MA supports the aim of clearer, more predictable decision-making outside settlements. But for S5 to be genuinely “selective”, it must be explicit that being in an ‘acceptable in principle’ category is only a starting point: proposals must still be appropriate for the specific site, including in landscape, ecological and resilience terms, and must not undermine protections and duties that apply in protected landscapes and their setting.

1) Support the principle, but guard against a “default yes” becoming too permissive

We note S5 is framed as proposals being approved unless benefits are substantially outweighed by adverse effects. MA understands the desire for consistency with S4 and for ensuring all national decision-making policies are applied.

But outside settlements, even “acceptable in principle” categories can have very significant local impacts (landscape character, habitat condition, access, smoke exposure, peat/soil disturbance). The policy should make clearer that site sensitivity and cumulative impact are central to the assessment, not an afterthought.

In practice this means decision-makers should explicitly identify the key sensitivities (eg. landscape setting, peat/soils and hydrology, habitat condition/connectivity, access constraints) and explain how these have been weighed in the ‘benefits vs adverse effects’ judgement.

2) Make climate adaptation (including wildfire and smoke) an explicit, practical consideration outside settlements

Outside settlements is where wildfire risk and smoke impacts are most likely to arise and where emergency access/water availability can be most constrained. The MA recommends an explicit requirement that, where relevant, proposals demonstrate:

1. appropriate location and layout to reduce wildfire exposure where development would be adjacent to vegetation fuels (including settlement-edge locations in rural upland areas),
2. safe access/egress and emergency response practicality, and
3. proportionate mitigation/management measures. This would align the “acceptable in principle” approach with real-world resilience needs.

This is not a new policy “layer”: it is a practical way of ensuring the ‘acceptable in principle’ approach operates consistently with public safety, emergency planning realities and climate adaptation duties in higher-risk rural settings.

3) Rural business and services: keep the category, but tighten the “necessary” test

The MA supports allowing rural businesses/services outside settlements where that location is shown to be necessary.

To prevent abuse and conflict, we suggest clarifying “necessary” through criteria such as:

1. operational need tied to land-based activity (agriculture, forestry, land management, tourism linked to landscape assets),
2. lack of realistically suitable sites within settlements, and
3. demonstrable minimisation of landscape/environmental harm.

4) Re-use/extension/replacement of existing buildings: avoid perverse outcomes

The MA notes the proposed approach to defining the “existing building” and the permissive approach to re-use/extension/replacement.

The MA recommends ensuring this does not incentivise:

1. incremental enlargement that erodes rural character, or
2. conversion pressure in sensitive locations (eg. deep peat/organic soils, highly visible skylines, designated habitats). The policy should more clearly require landscape-led design and proportionality, particularly in protected landscapes and their setting.

5) “Evidenced unmet need” and five-year supply: risk of reopening sprawl pressures

The MA is concerned that allowing development to meet an “evidenced unmet need” outside settlements (while requiring it to be well-related to an existing settlement) could still create pressure for poorly located housing in rural areas when supply is constrained.

If retained, The MA suggests clearer safeguards so this route cannot be used to justify development that would:

1. harm protected landscapes or their setting,
2. undermine nature recovery networks, or

3. increase climate risk exposure (including wildfire).

In summary, the MA supports a selective policy for development outside settlements, but only partly agrees unless S5 more explicitly embeds site sensitivity, cumulative effects, and climate adaptation (including wildfire/smoke) into how “acceptable in principle” is applied in practice.

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?

Partly agree

Please provide your reasons.

The Moorland Association supports the intention to provide clearer, more predictable rules for development outside settlements, and accepts that some categories of development can be acceptable in principle where they are genuinely necessary and appropriately sited and designed.

However, the MA can only partly agree unless the categories are framed with clearer safeguards to prevent inappropriate development in sensitive upland and protected landscape contexts.

The MA is not seeking to remove the categories. Our concern is operability. Unless the policy makes clear how category-based acceptability is constrained by site sensitivity, cumulative effects and protected landscape duties, the categories risk becoming a route to incremental harm, dispute and appeals.

1) “Acceptable in principle” must not become “acceptable regardless of location”

Outside settlements, impacts are often dominated by site sensitivity rather than category. The Framework should be explicit that classification within a category is only the starting point; proposals must still demonstrate that:

1. the location is appropriate in landscape and ecological terms,
2. cumulative effects are acceptable, and
3. climate adaptation risks (including wildfire and smoke impacts) are addressed where relevant.

In practice, decision notices should briefly identify the main sensitivities (landscape setting, designated sites/habitats, peat/soils and hydrology, access/track works, and smoke/wildfire exposure where relevant) and explain how these have been weighed in the ‘benefits vs adverse effects’ judgement.

2) Rural business and services: support, but strengthen the “necessary” and “no suitable alternative” tests

The MA supports enabling rural enterprises and services where an out-of-settlement location is genuinely needed. To reduce conflict and “category creep”, the MA recommends adding criteria such as:

1. demonstrable functional need linked to land-based/rural activity,
2. evidence there is no suitable site within or adjacent to a settlement, and
3. clear mitigation of landscape, access, biodiversity and water impacts.

This protects genuinely land-tied rural enterprise while reducing ‘category creep’ and the perception of unequal treatment between applicants in sensitive countryside locations.

3) Reuse/replacement/extension of buildings: support in principle, but protect landscape character and sensitive soils/habitats

The MA recognises the logic of supporting re-use of existing buildings and proportionate changes. However, this route can cause significant harm where:

1. buildings are in visually prominent or remote locations,
2. access upgrades trigger wider landscape/peat disturbance, or
3. incremental enlargement changes settlement patterns into sporadic sprawl. This commonly occurs through domestication effects (lighting, curtilage extension, fencing, parking/storage),

repeated 'minor' amendments, and access-track upgrading that expands the footprint and visibility of development over time.

The policy should more clearly require proportionality, landscape-led design, and avoidance of sensitive sites (including deep peat/organic soils, hydrologically sensitive ground, and priority habitats).

4) Development meeting “evidenced unmet need”: apply tightly and avoid becoming a five-year supply “release valve”

If the category is intended to respond to genuine local needs, it should be tightly defined so it cannot be used as a general justification for housing growth outside settlements. The MA suggests safeguards such as:

1. limiting this route to clearly evidenced local needs (including affordability/tenure),
2. requiring strong settlement relationship and landscape fit, and
3. excluding locations where protected landscapes, designated sites, or high climate risk (including wildfire exposure) would be compromised.

The policy (or guidance) should make clear that this route is not a general five-year-supply workaround for speculative housing in the countryside, but a tightly evidenced exception where locational and landscape constraints have been properly addressed.

5) Explicitly integrate climate adaptation and wildfire risk into the categories

The MA recommends the Framework make explicit that for categories likely to be located at the rural edge (including new homes near vegetation fuels, tourism accommodation, and conversions), decision-makers must consider:

1. wildfire exposure at the wildland–urban interface,
2. smoke impacts on sensitive receptors,
3. emergency access/egress and water availability, and
4. proportionate mitigation and long-term management arrangements.

This is simply an application of practical site suitability and public safety: outside-settlement categories often place development closest to vegetation fuels and furthest from resilient access and water supply.

In summary, the MA supports clearer categories for development outside settlements, but only partly agrees unless “acceptable in principle” is clearly constrained by site sensitivity, cumulative impacts, protected landscape duties, and climate adaptation considerations - particularly wildfire and smoke risks.

42) Do you agree with the approach to planning for climate change in policy CC1?

Partly agree

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

The Moorland Association supports a clearer, more consistent national approach to climate change through the planning system, including the emphasis on embedding climate considerations in planning and decision-taking. However, we can only partly agree as drafted, because CC1 risks being interpreted too narrowly (and too urban/flood-led) unless it more explicitly addresses the practical realities of climate risk in rural and upland landscapes.

In our experience, the main climate-related planning failures are often not about recognising risk in principle, but about decisions proceeding without clear, auditable evidence on whether risks can realistically be reduced and managed over the lifetime of development. CC1 should therefore be more explicit that 'consideration' must translate into deliverable action, monitoring and accountability where risks are material.

1) Climate adaptation must be framed as a “real-world risk management” duty, not just an aspiration

In upland and moorland settings, climate impacts translate into operational risks: wildfire, access constraints for emergency response, smoke exposure, erosion/hydrological change, and risks to

carbon stores. The MA experience is that adaptation language only improves outcomes when it is decision-useful: linked to mapped risk evidence, clear expectations for applicants and transparent reasoning in decisions.

2) CC1 should explicitly recognise wildfire as a core climate risk where relevant

The MA welcomes that the consultation includes a specific focus on wildfire elsewhere in the CC policies/questions, but CC1 should set the tone by making clear that wildfire risk is a climate adaptation issue that can be material to spatial strategy, site selection, design, and infrastructure planning (particularly where development is adjacent to vegetation fuels in rural upland and settlement-edge locations).

3) Avoid implying “less management results in more resilience”

In upland landscapes, resilience is not synonymous with management withdrawal. MA evidence from protected landscape plan work highlights that unmanaged fuel accumulation and structural uniformity can increase wildfire exposure in some contexts; policy should avoid creating downstream presumptions against lawful, evidence-led land management that supports resilience and public safety.

CC1 should be explicit that resilience outcomes are context-specific, and that evidence-led land management (including lawful fuel and habitat management and essential access/water infrastructure where appropriate) can be integral to adaptation delivery.

4) Delivery realism: connect risk to action and responsibility

The MA recommends CC1 (or its supporting guidance) encourages plans to be auditable and delivery-focused, ie. where significant risks are identified there should be linked measures, named responsibility, monitoring and review triggers. Where CC1 identifies material climate risks, plans should indicate the delivery pathway (policy requirement, infrastructure, management arrangements, or design standard) and how effectiveness will be monitored, so adaptation is not left to “hope and condition later. This is consistent with the wider need for outcome-focused regulation and clearer delivery accountability.

5) Strengthen cross-referencing so CC1 can’t be “read alone”

If CC1 is the gateway climate policy, it should explicitly signpost how it links to decision-taking on adaptation/mitigation and to specific risks (including wildfire). Otherwise, climate content can be treated as “plan narrative” rather than a consistent decision-making consideration.

Suggested improvement. The MA would support CC1 more strongly if it explicitly:

1. states that climate planning must address mitigation and adaptation, and that adaptation includes wildfire risk where relevant;
2. requires plans to be decision-useful by linking identified climate risks to deliverable measures, monitoring and review triggers;
3. confirms that lawful, evidence-led land management and essential safety/resilience infrastructure in rural/protected landscape contexts are compatible with adaptation delivery, where they reduce risk and harm.

In summary, the MA supports the direction of travel in CC1, but only partly agrees unless it more clearly anchors climate planning in deliverable, risk-led adaptation, explicitly including wildfire in relevant contexts.

43) Do you agree with the approach to mitigating climate change through planning decisions in policy CC2?

Partly agree

a) If not, what additional measures could be taken to ensure climate change mitigation is given appropriate consideration?

The Moorland Association supports the intention of policy CC2 to make climate mitigation a clearer and more consistent part of planning decision-making, including the signposting approach and the recognition of measures such as sustainable transport, resource-efficient design, re-use of

structures/materials, protecting/restoring carbon-storing habitats, and restricting fossil fuel extraction.

However, we can only partly agree unless the policy is strengthened to ensure mitigation is applied in a way that is evidence-led, avoids perverse outcomes in rural/upland settings, and better reflects the role of peat and other land-based carbon stores.

Key improvements the MA recommends

1. Make carbon stores in soils and peat explicit in decision-taking

CC2 correctly references protecting and restoring habitats which can act as carbon stores, but in practice the largest risks in upland areas often relate to soil and peat disturbance, hydrological change, and damage to carbon-rich landscapes. The policy (or accompanying guidance) should explicitly require decision-makers to assess likely impacts on carbon-rich soils/peatlands where relevant, not only above-ground habitat.

2. Strengthen requirements for “whole-life” carbon evidence for major schemes

To make mitigation decisions robust and consistent, the MA recommends that for major development (or development on sensitive carbon-rich land), applicants should provide proportionate evidence on:

1. whole-life carbon (including embodied carbon where relevant),
2. the carbon implications of land take / soil disturbance,
3. and realistic mitigation/compensation measures (including avoidance as the first step).

3. Avoid a simplistic “less management results in lower emissions” assumption

Mitigation should not be framed (explicitly or implicitly) in a way that treats land management as inherently negative. In upland settings, active management can be essential to protect habitats, reduce severe wildfire risk and safeguard carbon stores. The policy and guidance should be careful not to create indirect presumptions against lawful, evidence-led land management that supports resilience and avoids major carbon loss from uncontrolled wildfire.

4. Link CC2 more clearly to location and land-use choices

CC2 appropriately highlights transport and development patterns. For the MA, the key mitigation issue is ensuring decisions steer development away from locations where carbon loss is likely (eg. deep peat / high-risk hydrological settings) and where mitigation is not realistically deliverable.

The MA suggests the following additions (either in CC2 or in guidance):

1. A clear expectation to avoid and minimise impacts on carbon-rich soils/peatlands before relying on compensation.
2. A proportionate requirement for whole-life carbon assessment for major schemes and for proposals affecting carbon-rich landscapes.
3. Stronger decision-taking wording that mitigation includes land-use and soil impacts, not only operational energy and transport.

In summary, the MA supports the overall direction of CC2, but recommends strengthening it so mitigation properly accounts for peat/soil carbon, requires proportionate carbon evidence, and avoids unintended outcomes in upland and protected landscape contexts.

44) Do you agree with the approach to climate change adaptation through planning decisions in policy CC3?

Partly agree

a) What additional measures could be taken to ensure climate change adaptation is given appropriate consideration?

The Moorland Association supports the intention of policy CC3 to strengthen climate adaptation in planning decisions and to ensure developments are designed and located to be resilient over their

lifetime. That said, the MA can only partly agree unless the policy is tightened to address practical delivery and to reflect the most material adaptation risks in rural and upland areas.

1) Wildfire (and smoke impacts) should be explicit, not optional

For upland edge and rural locations, wildfire risk is a material climate adaptation issue affecting:

1. public safety and evacuation,
2. air quality and smoke exposure (including impacts on vulnerable people),
3. infrastructure resilience (power, water, telecoms), and
4. emergency access/response capacity.

The MA recommends CC3 explicitly requires a proportionate wildfire risk assessment where risk is credible, including:

1. siting and layout (setbacks, defensible space where appropriate),
2. access/egress and turning capacity for emergency vehicles,
3. water availability (where relevant),
4. long-term management arrangements (so measures persist after consent).

2) Move from “consider” to “demonstrate”

Adaptation policy often fails because applicants “reference” risks but don’t show how they are managed. CC3 should make clear that proposals must *demonstrate* resilience in design and operation, not merely acknowledge risks.

3) Require evidence-led site selection in high-sensitivity areas

In upland and protected landscape contexts, adaptation is often dominated by site constraints:

1. deep peat/carbon-rich soils and hydrological sensitivity,
2. steep terrain and limited access,
3. exposure to wildfire and smoke pathways,
4. constrained emergency response times.

CC3 should more clearly steer development away from locations where adaptation is not realistically deliverable, rather than assuming mitigation-by-condition later.

4) Clarify how CC3 interacts with other protective policies

To avoid CC3 being treated as “nice to have”, it should clearly cross-refer to the decision-making policies on:

1. the natural environment and protected landscapes,
2. pollution / public protection (Chapter 17) where smoke/air quality and public safety are relevant,
3. infrastructure and water resilience.

5) Delivery and long-term maintenance

Where CC3 relies on measures that require upkeep (e.g., vegetation management, drainage features, access routes), the policy should support enforceable mechanisms (conditions/obligations/management plans) to ensure they remain effective over time.

What changes are needed, the MA recommends CC3 is strengthened to:

1. explicitly include wildfire risk and smoke impacts as adaptation considerations where relevant;
2. require applicants to demonstrate resilience (not just “consider” it);
3. emphasise avoidance through site selection where risks/constraints are high; and
4. require long-term management arrangements for adaptation measures.

In summary, the MA supports CC3’s intent, but only partly agrees unless it is more explicit and delivery-focused—particularly on wildfire resilience and the realities of adaptation in rural and upland settings.

45) Does the policy on wildfire adaptation clearly explain when such risks should be considered and how these risks should be mitigated?

Partly agree

a) Please provide your reasons

The Moorland Association welcomes the fact that the draft NPPF now explicitly recognises wildfire as a material planning issue within climate adaptation policy and attempts to indicate both when wildfire risks should be considered and the types of mitigation that may be appropriate.

However, we can only partly agree that it is currently “clear enough”, for three main reasons:

1. **“When should it be considered?” needs a clearer trigger than general awareness**
CC3 flags wildfire risk, but it would benefit from a clearer expectation that wildfire risk should be assessed where development is proposed in, or adjacent to, areas with:
 1. a history of vegetation fires,
 2. continuous/seasonally dry fuels (e.g., heath, rough grassland, bracken), and/or
 3. known constraints on emergency access and response times. This matters in upland and moorland fringe locations where wildfire likelihood and consequences can be high, and access/water availability can be limiting.
2. **“How should it be mitigated?” needs to be more explicit about the practical mitigation package**
The policy would be clearer if it explicitly signposted that mitigation may need to address (where relevant):
 1. site layout and separation from hazardous vegetation fuels (especially at the wildland–urban interface),
 2. safe access/egress and turning for emergency vehicles,
 3. water availability / firefighting practicality (where appropriate), and
 4. long-term management arrangements (so mitigations don’t lapse after permission).
Without this, “mitigation” risks being treated as vague landscaping or generic resilience language rather than a measurable, enforceable set of measures.
3. **It should better reflect the cross-sector nature of wildfire responsibilities**
Wildfire risk is not solely a “development design” issue - it is also about operational capability, land management interface and coordination. The Wildfire Framework for England identifies roles for Defra and others around fuel load management and wildfire impacts on carbon storage and conservation outcomes.

Planning policy should therefore be clear that, where wildfire risk is material, decision-makers may need evidence of how proposals integrate with local wildfire planning/response arrangements and do not worsen risks through poor siting or unmanaged fuel interfaces.

Suggested improvements

1. Add a clearer screening trigger (where proposals are in/near vegetated wildfire-prone landscapes or where access constraints exist).
2. Make explicit that mitigation should be proportionate but enforceable, potentially via a wildfire resilience/management plan for relevant major schemes.
3. Ensure the policy aligns with the wider national approach to wildfire responsibilities and risk reduction.

In summary, the MA supports the inclusion of wildfire adaptation and partly agrees it provides a basis, but it needs tighter triggers and more practical specificity to ensure consistent application and meaningful risk reduction in rural/upland settings.

46) How should wildfire adaptation measures be integrated with wider principles for good design, and what additional guidance would be helpful?

The Moorland Association supports, in principle, requiring local plans to consider and where appropriate identify locations for facilities that support wildfire response and community safety (potentially including “wildfire refuges”, safe evacuation/assembly points, water points and

access/turning infrastructure) because wildfire is an increasing climate risk and planning has a legitimate role in helping ensure places are resilient.

However, this requirement should be framed carefully to ensure it is deliverable, proportionate, and evidence-led, and does not create unintended liabilities or unrealistic expectations in rural and upland areas.

Key points the MA recommends the NPPF guidance should include

1. Use a risk-based trigger, not a blanket duty everywhere

Plans should be required to identify such locations where wildfire risk and consequence are material, for example at the wildland–urban interface or in areas with known access constraints, seasonal fuel hazards, or repeated wildfire incidence. This avoids imposing disproportionate burdens on low-risk areas.

2. Clarify what is meant by “wildfire refuges” in an English planning context

The term may be interpreted inconsistently. If used, national guidance should define what qualifies as a refuge (eg. purpose, design expectations, capacity, access), and how it relates to local resilience/emergency planning, so it does not become an empty label on a map.

3. Integrate with fire and rescue / local resilience planning

Identification of refuges and response-support facilities should be done in partnership with:

1. Fire and Rescue Services,
2. Local Resilience Forums,
3. land managers and protected landscape authorities where relevant. This reflects that wildfire response is operational and multi-agency, not just a land-use planning matter.

4. Be explicit about deliverability and funding

Plans should not be required to designate facilities unless there is a realistic pathway for delivery (through developer contributions, public investment, or partnership delivery). Otherwise, designations risk becoming aspirational and contested.

5. Avoid perverse environmental impacts

Any new facilities (tracks, hardstanding, water tanks/points) must be located and designed to avoid harm to protected landscapes, peat and sensitive habitats. The plan requirement should explicitly recognise this balance and require careful siting and assessment.

In Summary, the MA supports requiring plans to identify suitable locations for wildfire response-support facilities where risk justifies it, but the policy should be risk-based, clearly defined, integrated with emergency planning, and framed around deliverable infrastructure rather than aspirational mapping.

47) Do you have any other comments on actions that could be taken through national planning policy to address climate change?

The Moorland Association supports, in principle, an expectation that local plans should steer new development towards areas of lower wildfire risk, where this is a material issue, because this is a practical application of climate adaptation through spatial strategy.

However, the requirement should be framed so it is evidence-led, proportionate, and workable, particularly in rural/upland and protected landscape settings.

Key points the MA recommends:

1. Risk screening should be proportionate and based on credible evidence

Plans should not be expected to produce highly technical wildfire modelling everywhere. Instead, they should use proportionate evidence sources (eg. known wildfire incidence, vegetation/fuel mapping, access constraints, topography, and local fire and rescue input) to identify where wildfire risk is likely to be materially higher.

2. **Avoid a false binary (“safe” vs “unsafe”)**
Wildfire risk is dynamic (weather, fuel condition, management, suppression capability). Plans should therefore steer development to lower-risk areas *where possible*, but also require robust mitigation where development is proposed in, or near, higher-risk interfaces.
3. **Explicitly include the wildland–urban interface (WUI)**
The policy guidance should recognise that risk is often greatest where settlement edges meet continuous fuels (heath, rough grass, bracken, woodland). Plans should identify and manage these interfaces (through spatial choices, buffers/green infrastructure design, and access considerations) rather than relying solely on site-level conditions later.
4. **Ensure alignment with protected landscapes and sensitive environments**
In upland protected landscape areas, “lower wildfire risk” locations may still be environmentally constrained (peat, habitats, landscape sensitivity). Plans should be expected to balance wildfire risk reduction with nature/landscape duties - meaning the “lower risk” steer must sit within the overall spatial strategy, not override other protections.
5. **Don’t treat land management as irrelevant to risk**
Because fuel structure and continuity influence risk, plans should avoid assuming wildfire risk is fixed. Where appropriate, plans can support longer-term risk reduction through land management-informed design and ongoing management arrangements at the settlement edge (without creating rigid national prescriptions).

In summary, the MA supports requiring plans to steer new development toward lower wildfire risk locations where wildfire is a material local issue, but the expectation must be evidence-led, non-binary, and integrated with protected landscape/environmental constraints and practical mitigation where higher-risk development is unavoidable.

85) Do you agree with the approach to meeting the need for business land and premises in policy E2?

Partly agree

Please provide your reasons, particularly if you disagree.

The Moorland Association supports the intent of proposed policy E2 to provide clearer, more confident support for business development, including giving substantial weight to economic benefits and recognising that some proposals have specific locational requirements. We also welcome the explicit recognition that, for farm and agricultural modernisation, benefits can include domestic food production, animal welfare and environmental outcomes.

In our experience, the issue is not whether economic benefits matter (they do), but whether E2 is sufficiently decision-useful in high-sensitivity rural and protected landscape settings. Without clearer signposting on how “substantial weight” is applied alongside existing environmental duties, E2 risks increasing inconsistency, dispute and appeals rather than improving delivery.

However, the MA can only partly agree unless the policy is tightened to ensure it is applied consistently in rural/upland areas and does not create unintended harms in protected landscapes and environmentally sensitive locations.

1) Support “substantial weight”, but require a clearer balancing framework in sensitive landscapes

The MA agrees that economic benefits should be given substantial weight. But in upland and protected landscape contexts, decision-makers also need a clear expectation that this weight must still be balanced transparently against:

1. landscape character and designated purposes,
2. biodiversity and water impacts,
3. peat/soil vulnerability and hydrology,
4. climate adaptation risks (including wildfire risk where relevant),
5. and cumulative impacts.

Where substantial weight is given, decision-makers should still explicitly identify the key sensitivities (eg. protected landscape purposes/setting, designated habitats, peat/soils and hydrology, access/track works, and wildfire resilience where relevant) and briefly explain how these have been weighed in the overall planning balance.

Without this clarity, E2 risks being read as a near “default yes” for commercial proposals, rather than a strong starting point subject to robust safeguards.

2) “Locational requirements” should be evidenced and not used to justify avoidable harm

The MA supports acknowledging that some businesses (including land-based enterprises) need particular locations. But E2 should more clearly require applicants to demonstrate:

1. what the functional/operational requirement is and why it is genuinely location-specific;
2. whether there are reasonable alternative sites (including within/adjacent to settlements where applicable, or via re-use/intensification of existing sites); and
3. how effects will be avoided and minimised through scale, layout, access design and (where necessary) management/maintenance commitments.

This reduces “locational requirements” being used as a justification for avoidable harm, while improving decision quality and predictability for applicants.

3) Farm/agricultural modernisation: welcome the recognition, but ensure it includes land management and resilience outcomes

The MA welcomes E2’s recognition of environmental benefits in agricultural modernisation proposals.

In rural upland settings, modernisation can also support practical resilience outcomes (eg. improved land management capability, animal welfare in extreme weather and reduced risk from climate impacts). The policy should ensure these benefits are treated as legitimate planning benefits where supported by evidence and not narrowly interpreted.

In upland settings, this should explicitly include land management capability that underpins environmental delivery and safety/resilience (for example, maintaining access, water availability and operational capacity that can be critical during extreme weather and wildfire periods).

4) Avoid unintended barriers for genuinely necessary rural enterprise outside settlements
E2 notes that “unmet need” factors will only be relevant in certain circumstances because policy S4 supports business development in principle within settlements.

The MA supports that direction, but many rural enterprises (including land-based operations) will still need to locate outside settlements. E2 should work cleanly with S5/S6 so that genuinely necessary rural business development is not forced into unsuitable settlement locations, while still preventing sporadic, harmful development.

E2 should therefore signpost that outside-settlement proposals remain subject to S5’s site-sensitivity and cumulative-effects logic, but that genuinely land-tied rural enterprise should not be treated as an exceptional afterthought where it supports sustainable rural economies and resilience.

5) Add an explicit steer on proportionality and deliverability

The MA recommends E2 (or supporting guidance) explicitly encourages proportionate evidence for SMEs and land-based businesses, while still requiring robust assessment where proposals affect sensitive locations (protected landscapes, deep peat/organic soils, priority habitats).

In summary, the MA supports the principle of E2 and the stronger support for business development (including agricultural modernisation benefits), but only partly agrees unless the policy more clearly embeds evidence-led locational justification and a transparent balancing approach in environmentally sensitive and protected landscape contexts.

86) Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3?

Partly agree

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

The Moorland Association recognises the national importance of freight and logistics to economic growth and supply chains, and we agree there is a case for clearer national decision-making policy given the distinctive scale and operational characteristics of logistics development and its need for appropriate transport links.

However, the MA can only partly agree unless the policy is strengthened to ensure it is applied consistently and does not create unintended harm in rural areas, protected landscapes and upland fringe locations.

1) Location and network access: avoid “good for the operator, bad for the locality”

We support policy emphasis on access to the transport network, but the policy should be explicit that “good access” is not just proximity to a trunk road: it also includes the suitability and resilience of the last-mile network, especially where HGV routing would rely on narrow rural roads, sensitive villages, or constrained access routes.

2) Rural amenity and public protection impacts need stronger weighting

Freight/logistics can create significant impacts beyond the red line boundary (noise, light, air quality, vibration, and out-of-hours activity). The MA recommends clearer wording that decision-makers should give particular weight to:

1. impacts on rural communities (including tranquillity and dark skies),
2. air quality and smoke-sensitive receptors, and
3. cumulative impacts where multiple logistics sites cluster along corridors.

3) Protected landscapes and their setting

Where proposals affect protected landscapes (or their setting), the policy should be clearer that support for logistics development does not diminish the weight that should be given to landscape purposes and conserving landscape character. Large-scale buildings, lighting and associated road works can be particularly harmful in open upland views and transitional landscapes.

4) Environmental safeguards: biodiversity, water and soils

Where freight/logistics proposals involve extensive hardstanding, drainage works and land take, the policy should clearly expect:

1. robust surface water management,
2. avoidance of sensitive habitats and hydrologically sensitive ground,
3. and meaningful biodiversity outcomes (not just minimal compliance).

5) Mitigation should be deliverable and enforceable

The MA would support the policy more strongly if it explicitly encouraged (where relevant):

1. freight routing and servicing plans (including agreed HGV routes),
2. operational management plans (hours, lighting, noise controls),
3. design measures to reduce visual impact,
4. and monitoring/review where impacts are uncertain.

In summary, the MA supports clearer national policy for freight and logistics in principle, but only partly agrees unless E3 is tightened to ensure the policy supports the sector without exporting impacts onto rural roads, rural communities and protected landscapes, and unless mitigation expectations are practical and enforceable.

87) Do you agree with the approach to rural business development in policy E4?

Partly agree.

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

The Moorland Association supports the intention of policy E4 to provide stronger and clearer support for rural business development and diversification, recognising the importance of rural enterprise to viable communities and land management.

However, the MA can only partly agree unless the policy is strengthened to ensure it works properly in upland/protected landscape contexts and does not unintentionally incentivise inappropriate development patterns.

1) Support rural enterprise, but keep location and landscape sensitivity central

The MA agrees rural businesses often need to be located outside settlements or close to the land or resource they manage. But E4 should more clearly require that proposals:

1. demonstrate functional need for the location (where outside settlements),
2. are appropriately scaled to their setting, and
3. avoid/mitigate harm to landscape character, biodiversity, water and soils.

This is especially important near or within protected landscapes and at upland settlement edges.

2) Avoid turning “rural diversification” into sporadic sprawl

In practice, rural business support policies can be used to justify incremental, dispersed development that erodes rural character and increases traffic on unsuitable roads. The MA recommends E4 is clearer that support is conditional on:

1. being well-related to existing settlements or established groups of buildings where possible,
2. minimising new build in isolated locations (unless clearly necessary), and
3. addressing cumulative impacts.

3) Recognise the role of land management and climate resilience as legitimate rural business outcomes

The MA would welcome an explicit recognition (in E4 or guidance) that rural business development can support:

1. land-based management capability,
2. conservation delivery,
3. and climate adaptation functions (including wildfire prevention/response capacity where relevant), provided these are evidenced and appropriately conditioned.

4) Strengthen deliverability and long-term management expectations

Where rural business development relies on ongoing management (eg. visitor infrastructure, access tracks, vegetation management at the interface), E4 should support enforceable management arrangements so that permissions do not lead to unmanaged impacts over time.

5) Provide clear signposting to protected landscape duties and environmental safeguards

E4 should more clearly signpost that support for rural business does not reduce the weight applied to:

1. protected landscape purposes (and their setting),
2. designated sites and irreplaceable habitats,
3. peat/soil and hydrological sensitivity,
4. and pollution/public protection impacts (traffic, noise, lighting, smoke-sensitive receptors).

In summary, the MA supports the stronger support for rural business development in E4, but only partly agrees unless the policy is clearer that support is conditional on appropriate siting, scale, cumulative impact management and robust safeguards for protected landscapes and environmentally sensitive rural areas.

96) Do you agree with the approach to planning for energy and water infrastructure in policy W1?

Partly agree

a) Please provide your reasons, particularly if you disagree, what alternative approach would you suggest?

The Moorland Association supports the overall direction of policy W1, particularly the emphasis on ensuring development plans reflect current and future capacity of energy and water infrastructure and the expectation of early engagement between plan-making authorities, utilities, regulators and network operators to identify constraints and address them proactively.

However, we can only partly agree unless the approach is strengthened to ensure it works effectively in rural/upland areas and protected landscapes, where infrastructure constraints and environmental sensitivities are often most acute.

1) Make “capacity and constraints” spatially explicit (and usable in decisions)

W1 is right to focus on understanding capacity and deficits, but plans should be expected to translate this into mapped spatial evidence (at an appropriate scale) showing:

1. electricity network constraints (including connection capacity pinch-points),
2. water resource and supply constraints, and
3. drainage/wastewater constraints. This would help avoid allocations being made where delivery is unrealistic and reduce late-stage failure at application.

2) Ensure plans don’t allocate growth where utilities cannot deliver without unacceptable environmental harm

In upland and protected landscape settings, “solving” constraints can imply new infrastructure with significant impacts (landscape, habitats, peat/soils, access). W1 should more clearly require that plans consider:

1. the environmental limits of delivering new/upgraded infrastructure (not just the engineering feasibility), and
2. cumulative impacts of multiple infrastructure upgrades across sensitive landscapes.

3) Stronger integration with climate adaptation and resilience

Energy and water infrastructure planning is also climate adaptation. Plans should be encouraged to consider resilience to:

1. drought and water scarcity,
2. wildfire (including water availability/access for response where relevant),
3. storm damage and outages in remote areas. This makes W1 more aligned with the Framework’s adaptation objectives, not merely growth enablement.

4) Avoid “protecting networks” becoming a one-way constraint on land management

We support the intent to avoid constraining the operation/expansion of networks, but W1 should also be clear that safeguarding infrastructure corridors must be applied proportionately and should not unintentionally block necessary rural land management, conservation delivery, or wildfire risk reduction measures.

5) Clarify what “appropriate provision” looks like in protected landscapes

W1 should be explicit (or guidance should be added) that “appropriate provision” for infrastructure in/near protected landscapes should prioritise:

1. use of existing corridors and previously disturbed land,
2. minimising landscape/visual impacts,
3. avoiding peat/priority habitats where practicable,
4. and early consideration of alternatives (including demand management, phased delivery, and decentralised solutions where suitable).

MA suggests retaining W1’s core approach but strengthening it by:

1. requiring plans to produce clear, spatially-referenced evidence of energy/water/wastewater constraints and planned upgrades; and
2. explicitly requiring plans to balance infrastructure delivery with environmental limits and resilience, particularly in rural/upland and protected landscape contexts.

97) Do you agree with the amendments to current Framework policy on planning for renewable and low-carbon energy development and electricity network infrastructure in policy W2?

Partly agree

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

The Moorland Association supports the direction of travel in W2, particularly the explicit inclusion of electricity network infrastructure alongside renewable and low-carbon generation, reflecting the reality that network upgrades are often required as standalone projects and are essential to meeting net zero and energy security goals.

However, we can only partly agree unless the amendments are strengthened to ensure plan-making is deliverable and spatially realistic in rural/upland and protected landscape contexts.

1) Support identifying suitable areas - but only where it is genuinely useful and evidence-led

MA agrees with the principle that plans should identify suitable areas for renewables, low-carbon energy and network infrastructure where doing so will help secure delivery, including repowering and life extensions.

But this must be:

1. proportionate to local capacity and skills,
2. based on credible constraints/opportunities evidence (landscape, ecology, peat/soils, access), and
3. framed to avoid “map-led” allocations that later prove undeliverable or environmentally unacceptable.

2) Ensure protected landscapes and upland sensitivities are properly reflected in “suitable area” work

In moorland and upland fringe areas, the constraints are often acute (open views, habitat networks, deep peat/organic soils, hydrology, limited access). W2 should more clearly require that “suitable areas” work:

1. avoids steering development into locations where impacts are inherently hard to mitigate, and
2. addresses cumulative effects (multiple schemes and associated grid works).

3) Repowering and life extension: welcome the recognition, but clarify expectations

MA welcomes explicit recognition that plans should consider repowering and life extension. However, policy or guidance should clarify that reassessment should still occur where:

1. the repowered scheme materially changes height/footprint/lighting,
2. grid infrastructure changes are substantial, or
3. baseline environmental conditions have changed (eg. habitat condition, access constraints).

4) Definitions are helpful - but must avoid ambiguity at the land-management interface

The MA supports clear glossary definitions for “electricity network infrastructure” and updated definitions for renewable/low-carbon energy to reduce inconsistent interpretation.

But the policy should avoid creating uncertainty where network works interact with land management and protected landscapes- particularly where access tracks, compounds, or vegetation clearance can create wider impacts.

Suggested improvements MA would support

1. Stronger wording (or guidance) that “identifying suitable areas” must be constraints-led, including protected landscapes and sensitive soils/peat.
2. A clear expectation to assess cumulative impacts and the linked impacts of grid connections (not just generation sites).
3. Clear signposting that W2 plan-making work must align with the wider decision-making protections in the Framework (so plan identification doesn’t become a presumption of acceptability in sensitive locations).

In summary, the MA supports the amendments in principle (especially the clearer treatment of network infrastructure) but only partly agrees unless W2 is applied through robust, constraints-led plan evidence that is realistic for rural upland and protected landscape settings.

98) Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3?

Partly agree

a) Please provide your reasons, particularly if you disagree, and any changes you would make to improve the policy.

The Moorland Association supports the principle of a clear, nationally consistent decision-making policy for renewable/low-carbon energy and electricity network infrastructure, and recognises the need to facilitate delivery of both generation and grid upgrades to meet energy and climate objectives.

However, we can only partly agree unless policy W3 is tightened to ensure it does not unintentionally weaken protections or create “default approval” pressures in rural, upland and protected landscape contexts.

1) Keep the balance: support delivery, but require robust constraints-led decision-making

The MA supports strong policy support for renewables and networks, but W3 must make it unambiguous that support is conditional on:

1. appropriate siting and design,
2. avoidance/minimisation of harm to protected landscapes and their setting,
3. protection of priority habitats and sensitive soils/peat,
4. and a transparent assessment of cumulative impacts.

Without this clarity, W3 risks being applied as a near-presumption in favour of energy infrastructure regardless of local sensitivity.

2) Cumulative impacts and “grid-connected landscapes”

In upland areas, the effects of renewables are often dominated by the combined footprint of:

1. generation assets,
2. access tracks/compounds,
3. transmission/distribution upgrades,
4. and repeated “enabling works”. W3 should more clearly require decision-makers to assess cumulative effects *including the grid connection*, not just the generation site.

3) Peat/soil and hydrological sensitivity should be explicit

Where proposals affect carbon-rich soils, deep peat, or hydrologically sensitive ground, the policy should clearly expect:

1. avoidance as the first step,
2. robust evidence on impacts and mitigation feasibility,
3. and careful consideration of indirect effects (drainage changes, drying, erosion pathways).

4) Protected landscapes: clarify how “public benefits” and duties are applied

The MA’s concern is not that energy infrastructure can never be appropriate, but that decision-makers need clear direction on how to apply:

1. protected landscape purposes and duties,
2. landscape character and visual sensitivity,
3. and alternatives (including use of existing corridors/disturbed land). W3 should clearly signpost that national support for energy does not reduce the weight that should be given to protected landscapes and their setting.

5) Don't overlook operational and resilience issues

Energy infrastructure decisions in remote/upland settings can create:

1. access and traffic pressures on unsuitable roads,
2. construction impacts over long timeframes,
3. and interaction with wildfire risk (both from construction/maintenance ignition sources and from the consequences of wildfire for infrastructure resilience). W3 should ensure these practical matters are treated as material where relevant, with enforceable construction and operational management plans.

Suggested improvements MA would support

1. Explicit requirement to assess cumulative impacts, including grid connection and enabling works.
2. Stronger wording on peat/soil/hydrology sensitivity and avoidance-first sequencing.
3. Clearer signposting on how W3 interacts with protected landscape policy and wider environmental protections.

In summary, the MA supports the need for strong decision-making policy to enable renewables and network infrastructure. But only partly agrees unless W3 more clearly embeds constraints-led siting, cumulative assessment, and robust protection for sensitive upland and protected landscape environments.

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?

Partly agree

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

The Moorland Association supports the overall intent of Policy N1 to make plan-making more evidence-led and strategic for nature recovery, including the explicit expectation that plans draw on Local Nature Recovery Strategies (LNRS) and other relevant environmental evidence to identify safeguards and opportunities.

However, we can only partly agree that the policy as drafted strikes the *right* balance, because several elements risk either (a) becoming too procedural to drive outcomes, or (b) being interpreted in ways that constrain genuinely strategic nature recovery delivery.

1) Stronger strategic evidence requirement is welcome - but must stay “outcome-focused”

The MA supports the requirement for plans to identify and steer development away from sensitive locations and to integrate opportunities for nature recovery at catchment/landscape scale (including across plan boundaries).

To improve deliverability, MA recommends clearer expectation that plans should translate this evidence into:

1. spatially explicit opportunity and constraint mapping, and
2. priorities for habitat enhancement and connectivity that are usable in site allocation and development management.

2) “Least environmental value” needs clearer guardrails in upland/protected landscape contexts

The principle of steering development to land of least environmental value is sensible, but MA recommends clearer wording and guidance to avoid perverse outcomes where “least value” is

interpreted narrowly (e.g., undervaluing land providing key functions such as hydrology, soil/peat carbon storage, or buffering designated habitats). Policy N1 already acknowledges soils/geology and the hierarchy of designated and important areas; this should be reinforced in implementation.

3) Biodiversity Net Gain: consistency is important - but the proposed restriction on >10% BNG needs careful handling

The MA understands and broadly supports the policy intent of improving consistency by limiting when plans can require BNG above the statutory minimum (to specific allocations, fully justified and deliverable, and not applied to exempt categories).

But the MA's concern is that, if drafted too tightly, this could unintentionally reduce the ability of plans to:

1. deliver strategic nature recovery outcomes where LNRS indicates a clear priority area, and/or
2. use site allocations to secure meaningful habitat networks and buffer/transition zones in sensitive landscapes.

Suggested refinement: allow >10% BNG requirements for specific allocations where they are clearly tied to LNRS priorities and demonstrably deliverable, including where higher gain is needed to deliver a coherent ecological network (not just as a generic "uplift" target).

4) Nature recovery must be resilient - policy should avoid assumptions that reduce management options

In moorland and upland contexts, "nature recovery" is not automatically achieved by management withdrawal. For example, unmanaged fuel accumulation can increase wildfire risk, with severe consequences for habitats, soils/peat carbon and biodiversity. The MA has previously highlighted the potential for policy approaches that inadvertently increase wildfire severity and associated environmental loss.

The MA recommends that N1 guidance more explicitly recognise that recovery planning should incorporate resilience and risk (including wildfire risk where relevant), and should not indirectly discourage lawful, evidence-led land management that supports long-term environmental outcomes.

5) Green infrastructure standards: welcome - but ensure rural proportionality

The MA supports requiring clear green infrastructure standards in plans, drawing on national benchmarks, but these should be applied proportionately in rural contexts and aligned with LNRS priorities rather than becoming a "tick-box" schedule.

In summary, the MA supports the direction of Policy N1 and agrees it improves strategic clarity, but only partly agrees it strikes the right balance unless the policy is tightened to (i) deliver clearer, mapped outcomes; (ii) treat "least environmental value" in a genuinely functional/ecosystem way; and (iii) ensure the approach to >10% BNG remains flexible enough to deliver LNRS-led strategic nature recovery while staying viable and deliverable.

180) In what circumstances would it be reasonable to seek more than 10% biodiversity net gain on sites being allocated in the development plan, especially where this could support meeting biodiversity net gain obligations on other neighbouring sites in a particular area?

The Moorland Association agrees there are circumstances where it is reasonable for a local plan to seek more than the statutory 10% BNG, particularly where doing so helps deliver strategic, landscape-scale outcomes rather than piecemeal mitigation. However, any requirement above 10% must be tightly framed to remain viable, deliverable, and legally robust.

Circumstances where >10% BNG could be reasonable

1. **Where it is needed to deliver a mapped, strategic nature recovery outcome (LNRS-led)**
It can be reasonable to seek >10% on specific allocations where the plan (drawing on LNRS and other evidence) identifies a clearly defined strategic objective that requires additional gain to be effective eg. completing a habitat network, buffering/expanding a core area, or delivering a stepping-stone corridor.

2. **Where there is a clear local “BNG delivery opportunity area” and the uplift is doing real work.**

10% is most defensible where the allocation is in a location that is demonstrably well-suited to habitat creation/enhancement (land characteristics, hydrology, connectivity), and the uplift will make the difference between a fragmented outcome and a coherent ecological network.

3. **Where it enables a joined-up, area-based solution across multiple sites (without weakening avoidance)**

Higher gain can be justified where it supports a plan-led approach to meeting obligations across neighbouring allocations - *but only where the plan still requires the mitigation hierarchy (avoid/minimise/restore) on each site* and does not use “one site uplift” to excuse avoidable harm elsewhere.

4. **Where the plan can show deliverability and long-term management**

10% should only be required where delivery mechanisms are credible: land availability, governance (e.g. habitat banks), monitoring, and long-term management arrangements. In upland and moorland edge contexts, habitat outcomes and resilience depend on ongoing management, not just initial creation.

Safeguards MA recommends (to keep >10% fair and workable)

1. Allocation-specific, not blanket: apply only to clearly identified allocations with stated reasons and mapped outcomes (not a whole-plan uplift “by default”).
2. Viability-tested: plans should evidence that the requirement won’t sterilise otherwise suitable allocations or push development to more environmentally sensitive locations.
3. Resilience-aware: where relevant, require that habitat delivery is resilient to risks such as drought and wildfire and includes practical management measures (rather than assuming “non-intervention” will deliver the intended outcome).
4. No perverse incentives: ensure higher on-site BNG requirements don’t incentivise developing “easier” land that is actually important for landscape function (eg. buffers, hydrology, carbon-rich soils), simply because it looks like a convenient uplift location.

In summary, the MA supports >10% BNG where it is plan-led, allocation-specific, evidence-based, viable, and delivers a strategic LNRS outcome, especially where it enables coherent habitat networks across neighbouring sites - *but it should not become a blanket expectation or a substitute for avoiding harm in the first place*.

181) Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development?

Partly agree

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

The Moorland Association supports the intent of Policy N2 to make decision-taking more consistently nature-positive, and we welcome the clearer statement that proposals should take account of landscape character and existing natural features, and should deliver improvements for nature through BNG (where relevant), LNRS actions, green infrastructure and nature-based solutions.

However, we can only partly agree that N2 is “sufficiently clear” as drafted, because several elements would benefit from tighter wording and clearer boundaries to ensure consistent application - particularly in rural upland and protected landscape settings.

1) Clarify what “existing natural characteristics” includes (and avoid narrow interpretations)
N2 would be clearer if it explicitly confirmed that “existing natural characteristics” includes functional characteristics, not just visible features—particularly:

1. soils and peat / carbon-rich soils, hydrology and drainage pathways;
2. habitat connectivity / ecological networks (including LNRS priorities);
3. site-edge functions (buffers, transitional habitats, microclimate, shelter, wildfire exposure at settlement edges).

This would reduce the risk of “characteristics” being interpreted narrowly as just trees/hedges or designated habitats.

2) Make the “enhance” expectation more decision-useful (avoid vague uplift language)

The MA supports an expectation for enhancement, but the policy should be clearer about what counts as enhancement in practice, for example:

1. applying the mitigation hierarchy (avoid–minimise–restore–offset) in a transparent way;
2. requiring enhancements to be measurable and deliverable (management, monitoring, long-term maintenance), rather than generic landscaping commitments.

This aligns with the MA’s wider experience that outcomes slip when policy relies on aspiration without clear delivery logic.

3) Nature recovery must be resilient (include wildfire risk where relevant)

In upland fringe and heath/rough grassland contexts, nature recovery and “greening” measures can unintentionally increase fuel continuity and therefore wildfire exposure if not designed and maintained appropriately. MA’s protected landscape plan work repeatedly highlights the need to treat wildfire as a practical climate/public safety risk that must be designed for, not assumed away.

N2 (or its guidance) should therefore signpost that enhancement measures should be resilience-aware where wildfire risk is credible (especially at the wildland–urban interface).

4) “Swift bricks” - support the objective, but keep proportionality and practicality

We support features for wildlife in new development, but the new requirement for swift bricks would benefit from:

1. a clear proportionality approach (eg. major vs minor schemes; suitability of building form),
2. flexibility where alternative, evidence-based biodiversity features deliver better outcomes for the site/species.

In summary, the MA supports the direction and much of the content of N2, but recommends strengthening definitions, delivery clarity, and resilience considerations (including wildfire risk where relevant) so expectations are consistently applied and genuinely outcome-focused.

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?

Partly agree

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

The Moorland Association broadly supports the direction of travel in Policy N4 in:

1. reinforcing that development in Protected Landscapes should be limited, sensitively located and designed; and
2. applying “substantial weight” to conserving and enhancing natural beauty (and wildlife/cultural heritage in National Parks).

We also welcome the consultation’s stated intent that the updated drafting should better reflect the strengthened “seek to further” statutory duty (Levelling Up and Regeneration Act 2023) and the emphasis on mitigation/compensation where major development is exceptionally permitted.

However, we consider the policy would benefit from greater precision in a few key areas to ensure consistent, lawful application and to avoid uncertainty for land managers, applicants, and decision-makers:

1. Clarify how N4 aligns with (and evidences) the statutory “seek to further” duty

Policy N4 would be clearer if it explicitly stated that, when exercising planning functions, relevant authorities should demonstrate how decisions have sought to further Protected Landscape purposes (not simply “have regard”). This could be done by requiring decision reports to explicitly reference Protected Landscape purposes and show how harms are avoided/mitigated.

2. **Make the “exceptional circumstances / public interest” test more operational**

N4(2) sets the right high bar for major development in Protected Landscapes, with the established three-part assessment.

But it would help to clarify that:

1. “need” should be evidenced with up-to-date assessments and realistic alternatives; and
2. “public interest” should include consideration of long-term environmental public goods delivered by these landscapes (carbon storage, water regulation, biodiversity recovery, tranquillity/dark skies), not only short-term economic indicators.

3. **Define expectations for mitigation and compensation to avoid perverse outcomes**

N4(3) adds helpful emphasis on mitigating impacts on special qualities (including tranquillity and dark skies). The footnote reference to compensation is potentially useful, but should be tightened so that compensation:

1. is clearly a last resort, after avoidance and mitigation;
2. is like-for-like (or better) in terms of the Protected Landscape’s special qualities; and
3. is secured through enforceable, long-term mechanisms (monitoring/management), not short-term or uncertain measures.

4. **Strengthen the “setting of protected landscapes” provision**

N4(4) begins to address the setting of Protected Landscapes, but it would benefit from clear wording that “setting” effects can include impacts on: views, tranquillity, dark skies, hydrology, wildfire risk, and recreation - particularly where development outside the boundary undermines designation purposes.

Suggested revisions

1. Add a sentence in N4(1) or N4(3) requiring decision-makers to demonstrate how the decision seeks to further Protected Landscape purposes (especially where harm is identified).
2. Expand N4(3) to state that mitigation/compensation measures should be designed specifically to maintain or enhance the statutory purposes and special qualities of the Protected Landscape, with long-term management and monitoring secured.

We feel Policy N4 is a solid base and broadly in the right place, but the above clarifications would make it more consistently applied, more legally robust, and more effective in practice.

183) Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning system?

Partly agree

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

The Moorland Association welcomes the explicit recognition in policy N4 that development outside a protected landscape can nonetheless affect its purposes and special qualities, and that decision-makers should therefore consider impacts on the setting of National Parks and National Landscapes.

However, we can only partly agree that the approach is “clear and appropriate” as drafted, because the concept of “setting” remains prone to inconsistent interpretation unless the policy gives clearer direction on (i) what “setting” effects include, and (ii) how decisions should demonstrate compliance.

1) “Setting” should be defined through effects, not mapped as a fixed band

The MA agrees the setting is not a fixed line on a map, and should be understood through the effects of development on the protected landscape. The policy could be clearer by explicitly confirming that setting impacts can include (where relevant):

1. visual impacts on key views and skylines (including long-distance upland views),
2. impacts on tranquillity and dark skies,

3. recreational experience and access,
4. ecological connectivity and hydrological function,
5. and climate resilience considerations at the wildland–urban interface (e.g., wildfire exposure and smoke-sensitive receptors).

2) Require decision-makers to “show their working”

To improve consistency, N4 should expect that planning decisions include a clear statement of:

1. the protected landscape’s relevant special qualities/purposes likely to be affected,
2. the pathways of impact (how the proposal affects those qualities), and
3. the mitigation/alternatives considered (including why residual harm is acceptable where harm remains).

This would make the policy more operational and reduce dispute and appeal risk.

3) Cumulative impacts in the setting need explicit emphasis

Incremental development around protected landscape boundaries can cause significant cumulative harm (lighting creep, gradual erosion of tranquillity, repeated skyline impacts). The policy should more explicitly require cumulative effects assessment in the setting, not only single-scheme impacts.

4) Ensure the setting policy aligns with the strengthened statutory duty

Given the strengthened “seek to further” duty for relevant authorities, the setting policy should clearly sit within that approach: if a proposal affects the setting in ways that undermine purposes/special qualities, decision-makers should demonstrate how the decision has sought to further those purposes (including through avoidance, redesign, or refusal where necessary).

In summary, the MA supports the inclusion of a setting policy and agrees it is directionally appropriate, but only partly agrees it is sufficiently clear. N4 should provide clearer direction on what “setting” effects include, require transparent reasoning in decisions, and strengthen emphasis on cumulative impacts to ensure consistent, lawful application.

184) Are there any further issues for planning policy that we need to consider as we take forward the implementation of Environmental Delivery Plans?

The Moorland Association supports the principle of improving clarity and consistency around what constitutes “major development” in protected landscapes, because inconsistent classification is a common cause of uncertainty, conflict and appeal risk. We also agree that the concept should remain effects-based and context-specific, rather than relying solely on generic thresholds.

Clearer national direction here would support lawful, consistent application of protected landscape duties: the aim should be predictable reasoning (not identical outcomes), with decision-makers explicitly addressing effects on special qualities and cumulative change.

However, we can only partly agree that the proposed approach is sufficient as drafted, because it will still be applied inconsistently unless the Framework and/or guidance provides clearer direction on how “major development” should be assessed in practice.

1) “Major development” should be assessed by effects, not just scale - but the policy needs clearer criteria

In protected landscapes, relatively modest development can be “major” in its impacts due to sensitivity, visibility and the importance of special qualities. MA therefore supports an effects-led approach, but recommends the policy/guidance explicitly signposts decision-makers to consider factors as shown below.

To keep the approach effects-based (not threshold-led), the Framework/guidance should also state that the judgement must be rooted in the proposal’s likely effects on special qualities (including through enabling works and in-combination change), not simply the description of the development type.

1. scale, massing and height relative to the landscape context;
2. prominence in key views/skylines and impacts on landscape character;
3. impacts on tranquillity and dark skies (including lighting);
4. the extent of associated infrastructure (roads/tracks, grid connections, compounds);
5. impacts on designated habitats, hydrology and carbon-rich soils/peat; and
6. duration and intensity of construction effects, and cumulative impacts with other schemes.

2) Add clearer expectations for consistency and transparency in decision reports

To reduce variation, the Framework should require that where a proposal is in a protected landscape (or its setting) and “major development” is in question, decision reports should:

1. state whether the authority considers the proposal “major development” and why (referencing the key effects);
2. identify the protected landscape’s relevant special qualities/purposes likely to be affected and the main pathways of impact; and
3. summarise how alternatives, design changes and mitigation were considered, and why any residual harm is (or is not) acceptable.

3) Avoid unintended “down-classification” of impactful infrastructure

The MA is particularly concerned that infrastructure-related development (including enabling works, tracks, borrow pits, grid works, or repeated incremental upgrades) can be treated as “not major” when, cumulatively, it can have substantial effects on special qualities. The policy should be explicit that associated development and cumulative impacts are relevant to the “major development” judgement.

Guidance should also caution against artificial segmentation (eg. treating tracks/grid/borrow pits as separate “minor” elements) where, taken together, the proposal materially alters landscape character, tranquillity/dark skies, or habitat/peat/hydrological function.

4) Keep room for protected landscape authorities and local context

Any national approach should avoid becoming a rigid checklist that prevents protected landscape authorities and LPAs from applying local knowledge and landscape character evidence. The goal should be consistent, transparent reasoning grounded in landscape character evidence and special qualities - while retaining discretion for protected landscape authorities and LPAs to apply local context.

In summary, the MA supports the intent to clarify major development in protected landscapes, but only partly agrees unless the policy is supported by clearer criteria and stronger expectations for transparent reasoning - particularly to prevent significant (including cumulative) impacts being under-classified.