From: Philip Orpwood [redacted]
Sent: 04 February 2026 21:40
To: NEW East 1
Subject: Re: Planning Inspectorate APP/Z3825/W/25/3375892: Gardeners Cottage, RH20 4BF
Attachments: NPPF 2026.pages; pdf NPPF 2026.pdf

Good morning [redacted]
Sorry to bother you, but I recall in your instructions that the inspector may consider new evidence after the closing date if relevant and only just published. Two new items now in the public domain. Firstly our Barn in the linked field giving access to the site has just been granted planning consent to be turned into a dwelling (a vote in favour 8 to 1 on the 4th February 2026 to approve planning application DC/25/1329). Formal notification yet to be received but the meeting is on YouTube and should be on their web site today. The second is the governments published consultation NPPF 2026 which is particularly aimed to make it harder for LPA to be inconsistent and corrupt. For easy I have downloaded an experts observations of the relevant points. Not sure you can open pages so also attached the same as a pdf.

I would ask you please to make the Inspector aware of these recent changes that have a direct bearing on the appeal he is kindly considering.

Many thanks
Philip

Philip Orpwood FRICS (ret)
Trustee and Hon. Estates manager to the
Norbertine Order in Storrington and Filey
A registered charity in the UK
Reg. No. 257658

Philip Orpwood FRICS (ret)
Chairman of trustees to the
Eva Clare Davidson Housing Charity
Reg. No. 209925

On 30 Jan 2026, at 03:58, NEW East 1 [redacted]> wrote:

Hi Philip,
Thank you for your email and revised document of which I confirm receipt.
Kind regards,
[redacted]

[redacted]
Casework Officer
Planning Inspectorate
[redacted]
www.gov.uk/pins
Ensuring **fairness**, **openness** and **impartiality** across all our services
This communication does not constitute legal advice.

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From: Philip Orpwood [redacted]
Sent: 28 January 2026 18:56
To: NEW East 1[redacted]>
Subject: Re: Planning Inspectorate APP/Z3825/W/25/3375892: Gardeners Cottage, RH20 4BF

Hi again [redacted]
I think I have been able to sort the amendment you requested and I attach the revised version. Please let me know if you need any thing else. I will forward a revised copy to the LPA.
Many thanks
Philip

Philip Orpwood FRICS (ret)
Trustee and Hon. Estates manager to the
Norbertine Order in Storrington and Filey
A registered charity in the UK
Reg. No. 257658

On 27 Jan 2026, at 02:49, [redacted] wrote:

The Planning Inspectorate (England)
Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6PN
http://www.planningportal.gov.uk/planninginspectorate
Twitter: @PINSgov
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Name	Size	Modified
Index/Document.iwa	16,754	2/2/2026 9:59 PM
Index/ViewState.iwa	939	2/2/2026 9:59 PM
Index/CalculationEngine-168656...	514	2/2/2026 9:59 PM
Index/AnnotationAuthorStorage...	23	26/4/2022 12:43 PM
Index/DocumentStylesheet.iwa	43,918	2/2/2026 9:40 PM
Index/DocumentMetadata.iwa	77	2/2/2026 9:37 PM
Index/Metadata.iwa	17,081	2/2/2026 9:59 PM
Metadata/Properties.plist	379	2/2/2026 9:59 PM
Metadata/DocumentIdentifier	36	2/2/2026 9:37 PM
Metadata/BuildVersionHistory.plist	267	2/2/2026 9:37 PM
preview.jpg	242,655	2/2/2026 9:37 PM
preview-micro.jpg	1,613	2/2/2026 9:37 PM
preview-web.jpg	15,950	2/2/2026 9:37 PM

Comment

Edge-of-settlement greenfield sites and the end of policy deadlock

For many years, greenfield sites at the edge of settlements have been caught in policy deadlock. Where settlement boundaries are out of date and housing delivery is failing, such sites are routinely refused in principle, even when they sit adjacent to existing development, are well connected to services, and are capable of forming logical extensions to settlements.

The direction of travel in the draft NPPF 2025 points towards a different approach. Where a local planning authority cannot demonstrate a five-year housing land supply, the presumption in favour of sustainable development is expected to engage earlier and more decisively. In those circumstances, rigid settlement boundaries are no longer treated as absolute barriers but as policy tools whose weight depends on whether the plan is delivering.

This represents a significant practical shift. The key question becomes whether the site is suitably located and whether its impacts can be addressed, rather than whether development crosses an outdated line on a plan. For edge-of-settlement greenfield sites, decision-making moves away from prolonged debate about principle and towards tangible considerations such as accessibility, infrastructure capacity, landscape impact, and deliverability.

Where delivery is failing and impacts can be managed, planning permission should not be withheld simply because a boundary has not yet caught up with reality.

3. Housing need

This is where the draft NPPF 2025 becomes technically unforgiving.

The 2024 Framework anchors housing need in the standard method and reinforces the expectation that plans should meet identified needs and respond to demographic realities.

Here is the critical change: The Draft 2025 Framework retains this foundation but strengthens the strategic logic behind requirement-setting. It reduces the scope for housing numbers to be treated as a negotiable political outcome rather than a reflection of need.

Crucially, the calculation itself has changed. The new method abandons the volatility of household projections in favour of a baseline set at 0.8% of existing housing stock, providing a more stable, supply-oriented target.

Furthermore, the arbitrary 35% urban uplift for the largest cities has been scrapped in favour of a universal affordability adjustment that kicks in earlier (at a ratio of 5 rather than 4) and bites harder.

The scale of the problem justifies this shift. Centre for Cities estimates that compared to the average European country, Britain has a backlog of 4.3 million homes that were never built. To clear this deficit within 25 years while meeting ongoing demand would require 442,000 homes per year in England alone. At current delivery rates, the backlog would take over half a century to address. The government's 300,000 target, even if achieved, does not close the gap.

My view on housing delivery

The real change is not mechanical but psychological. Where delivery has collapsed, where five-year land supply has evaporated or housing delivery test scores have slumped below 75%, decision-makers will increasingly shelter behind national policy rather than exercise local discretion. For applicants, this creates a starker sorting mechanism: strong schemes in sustainable locations should move to consent more quickly; weak schemes should fail more decisively.
The space for negotiation contracts in one sense but deepens in another. Affordable housing, long treated by developers as a viability hurdle to be negotiated down, becomes instead a lever for unlocking the presumption in favour of development. Those who grasp this inversion will prosper; those who do not will find planning committees and inspectors less sympathetic than before. And if this logic reshapes decision-making in urban areas, its effects on Green Belt policy are more profound still.

11. Appeals

A clearer national policy environment should reduce speculative refusals and narrow the grounds on which appeals are won and lost. Under NPPF 2024, appeals were often the arena where supply failures were tested and corrected, but with mixed predictability. With the Draft NPPF 2025's more directive national policies, the appeal landscape is already evolving.
One of the most instructive developments has been how Grey Belt appeals have played out in practice. Early data shows that a large majority of major residential appeals on Grey Belt land are being allowed because the policy

removes the need to demonstrate very special circumstances when the criteria are met, shifting the focus onto sustainable location, compliance with the Golden Rules, and demonstrable housing need.

In fact, recent appeal analyses show that around four in five major residential Grey Belt appeals have been approved by the Planning Inspectorate since the updated policy took effect, with overall approval rates meaningfully higher than under the old Green Belt regime. At the same time, not all Grey Belt appeals succeed; decisions still turn on context, sustainability, and the strength of evidence on both harm and deliverability.

In practice, this means that appeals will increasingly reward applicants who submit disciplined, policy-aligned cases with robust evidence of sustainable location, housing need, and compliance with the policy tests. Refusals that lean on outdated local policy or subjective concerns are likely to struggle because they will be measured against much clearer national criteria.

Until plan-making catches up with delivery imperatives, clearer appeal outcomes may be a necessary corrective to local inertia, but they will also require applicants to be more thoughtful, evidence-led, and pragmatic in both preparation and presentation.

12. Environment and climate

NPPF 2024 aligns planning policy with net zero ambitions and climate resilience and expects both plans and decisions to address mitigation and adaptation. This is where the draft quietly changes the risk profile of sites.

The draft maintains this commitment, but its restructured approach makes policy application clearer between plan-making and decision-taking. That matters because climate policy often fails in practice not because it is absent, but because it is treated as a statement of principle rather than as a set of operational requirements that shape design, energy strategy, materials, overheating risk, water management, and biodiversity. Where benefits are clear and evidenced, approval becomes easier to justify.

A specific but high-impact change concerns surface water flooding. The draft removes the requirement for a sequential test on sites at risk of surface water flooding, provided the development can be made safe for its lifetime without increasing risk elsewhere. This unlocks a significant number of constrained urban sites that were previously trapped by rigid sequential logic despite being technically deliverable.

Equally significant is what has been removed. The concept of "valued landscapes," a subjective designation often used to block development on ordinary countryside that lacks national protection, appears to have been deleted from the framework. This strips away a nebulous layer of protection that often functioned as a proxy for Green Belt policy in areas where no Green Belt existed.

These removals are balanced by strengthened support for renewable energy. The benefits of renewable and low-carbon energy generation are upgraded from carrying "significant weight" to "substantial weight" in the planning balance.

However, the draft also introduces a new category of technical risk that is easy to underestimate until it derails a layout. A note of caution is warranted on the natural environment, where small definitional changes may have outsized operational consequences. The draft significantly

expands the definition of “veteran trees”. Legal experts warn this broadens the scope for what constitutes a showstopper constraint, potentially bringing thousands of additional trees into a protection category that requires “wholly exceptional circumstances” to justify loss.
The technical catalyst for this risk is a seismic shift in the glossary definition of a “veteran tree”. By replacing a single “and” with an “or”, a tree no longer needs to meet criteria for age, size and condition, just one will do. This could overnight turn thousands of ordinary specimens into “showstopper” constraints requiring “wholly exceptional circumstances” to remove.
For developers, this is not just an environmental footnote; it is an operational requirement. It necessitates much earlier arboricultural assessments to avoid late-stage refusals or expensive redesigns. It highlights a recurring theme in the draft: while the front door for development is opening wider, technical caveats in the back room are becoming far more potent.

13. Needs of different groups and accessibility

NPPF 2024 requires planning to address the needs of different groups and to ensure the housing mix responds to local demand, including older people and disabled people. The Draft 2025 direction signals clearer national expectations around accessibility and demographic alignment. This implies that accessibility standards and inclusive design will carry more weight, particularly in

locations where demographic change is pushing demand towards adaptable and accessible homes.
In practice, schemes that demonstrate inclusive design, step-free access, and long-term adaptability should face fewer objections and stronger policy support, particularly where the local plan has been weak on delivery for these groups.

14. Small and medium sites

NPPF 2024 supports diversification of supply and recognises the role of small sites in maintaining delivery. In practice, however, delivery strategies remain overly dependent on large strategic allocations that take years to mobilise and are vulnerable to market cycles, infrastructure delays, and single-point-of-failure risk.
The Draft 2025 direction addresses this by formalising a supply category that has long existed in practice but lacked policy recognition: the medium site. Defined as schemes of 10 to 49 homes or up to 2.5 hectares, these sites occupy the space between garden-land infill and strategic allocation. They are large enough to make a meaningful contribution to supply, but small enough to be delivered quickly by regional housebuilders without complex phasing or extensive infrastructure.
To operationalise this, Policy HO6 proposes a dual quota. Authorities would be required to allocate land to accommodate at least 10 per cent of their housing requirement on small sites of no larger than one hectare, and a further 10 per cent on medium sites of between one and 2.5 hectares. This institutionalises supply diversity rather than leaving it to chance.

Supporting measures follow. Small sites under 0.2 hectares would be exempt from Biodiversity Net Gain requirements, and the consultation invites views on extending exemptions or simplified metrics to brownfield sites up to 2.5 hectares. A system that values delivery should treat medium sites as a strategic supply layer rather than a peripheral category. That requires clearer policy support, faster decision-making, and a proportionate approach to technical requirements.

There is, however, a notable gap. Explicit support for the subdivision of existing plots and residential intensification has been weakened in the draft. This is a missed opportunity. Subdivision has historically been a reliable engine for small builders to deliver hidden supply in sustainable locations without requiring new land allocations, and its quiet removal from the policy emphasis deserves scrutiny.

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