

10th March 2026

2025 DRAFT NPPF – RESPONSE by FEDORA – the Voice for Oxshott CIC

Dear Sirs

Please find set out below the key issues that FEDORA – the Voice for Oxshott CIC has with the proposed 2025 NPPF.

We are a community organisation whose objective is to carry on activities for the general benefit of the community of Oxshott, Surrey and in particular to take such actions as deemed necessary to conserve and enhance the environment of Oxshott, the amenities and infrastructure of Oxshott village and its surroundings and to bring the Company's views to the appropriate authorities and other relevant parties.

On that same basis we present our key concerns with the proposed NPPF. They are:

While FEDORA recognises the national need for housing, the draft revised NPPF uses a centrally driven, 'rules based' approach which lessens the flexibility of the previous, local authority plan-led system.

This poses a threat to the Green Belt surrounding Oxshott, undermining the Green Belt's primary purpose of openness, permanence and preventing urban sprawl.

30 MONTHS - AN UNREALISTIC TIMETABLE FOR THE INTRODUCTION, DEVELOPMENT AND IMPLEMENTATION OF STRATEGIC PLANNING BOARDS (SPB) AND SPATIAL DEVELOPMENT STRATEGIES (SDS) INTO LOCAL PLANS FOR NEW LOCAL AUTHORITIES

It is planned that Strategic Planning Boards will be set up in those areas where an SDS will be prepared for a combination of lower tier Authorities (possibly Surrey West and Surrey East). The SDS will be then subject to an independent examination.

This top tier plan will address areas such as growth, strategic infrastructure, housing targets and Green Belt. For Green Belt "The preparation of spatial development strategies should be informed by an assessment of the strategic role of Green Belt land within the strategy area". A lower tier, local plan will then be produced by a local planning authority (e.g. Surrey East) and guided by the SDS.

It is unrealistic to expect that new authorities, such as Surrey West and Surrey East, will be in a position to develop a Local Plan in a timely fashion, especially the suggested 30 months, when operating under their new operating structure involving Strategic Development Boards and Spatial Development Strategies with little, if any, local input into the Strategic Planning Boards (SPB) and Spatial development strategies (SDS).

Almost inevitably issues will arise over (i) resolution of possible conflicts between the two tiers of authorities and the new authorities' local plans, and yet again, (ii) how communities will be made aware of and engaged in this new process.

LOCAL VIEWS & COMMUNITY ENGAGEMENT CURTAILED

The draft NPPF will limit discretion for local planning authorities.

- A mandatory 30-month timetable imposed for Local Plans will be challenging for authorities already facing staffing and budget pressures. It also risks local plans that are rushed, insufficiently evidenced and authorities falling outside the timetable facing speculative applications under a strengthened development presumption.
- The draft introduces National Decision Making Policies (NDMPs). If a local policy conflicts with an NDMP, the draft instructs that local policy be given "very little weight," effectively minimising local views and circumstances.

HOUSING TARGETS ARE UNREALISTIC

The "Standard Method" for housing targets, has been strengthened into a non-negotiable directive.

Housing targets will be calculated using 0.8% of existing housing stock plus a heavy affordability uplift. The detail of the new standard method and its interaction with constraints will be critical and may create tension between high targets and capacity in constrained areas.

The target for Elmbridge has risen from 465 houses per year as proposed in the withdrawn Local Plan to a totally unrealistic target of 1443 houses per year. Quite simply this is not deliverable as noted in the recent letter sent to Mark Pennycook, Minister for Housing by Ben Spencer, the MP for Runnymede and Weybridge and local Elmbridge Councillors.

PRESUMPTION IN FAVOUR OF DEVELOPMENT

The draft NPPF moves to a "permanent presumption in favour of suitably located development". If a site is brownfield, "Grey Belt," or near a well-connected station, development is accepted by default, subject to meeting the "Golden rules", eg 50% affordable housing.

If a council fails to provide a five-year housing land supply, as is the case with Elmbridge, planning permission is more likely to be granted. Therefore, it makes it more difficult for local councils to refuse well-designed schemes on land unless it is protected by National designations or is clearly high performing Green Belt.

THE PURPOSE OF GREEN BELT AS SAFEGUARDING THE COUNTRYSIDE FROM ENCROACHMENT IS LOST

Grey Belt is defined in the draft NPPF as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not

strongly contribute (low-quality) to any of the purposes as defined in the current NPPF:

- A: sprawl of large built-up areas
- B: prevent merging of towns
- D: preserve historic settings of towns

But the draft NPPF excludes purpose (C), “safeguarding the countryside from encroachment from the grey belt identification criteria”. This would ignore a fundamental characteristic of Green Belt - its permanence and openness.

GREEN BELT BOUNDARIES LIKELY TO BE SUBJECT TO CHANGE, PARTICULARLY AROUND VILLAGES

The draft NPPF confirms a strategic, targeted approach to Green Belt, with routine assessment of Green Belt and a clear expectation that Green Belt boundaries will be altered where necessary, especially around “suitable stations”.

These present a number of challenges to the current Green Belt Boundaries:

- Strategic planning may identify broad locations around villages suitable for boundary review, effectively signalling that Green Belt release should be considered, even before detailed local evidence has been assessed.
- There is encouragement to assess Green Belt in smaller parcels. In practice, smaller parcels could be judged as “weaker”, even though they still contribute to openness, separation between settlements and local character.
- The draft also mandates that councils must review Green Belt boundaries if they are unable to meet their identified need for development in full.

There is a risk the draft provides a shield for “sprawl,” where high-density, high affordability housing justifies building over the existing, open Green Belt gaps that prevent villages from merging into urban conurbations. Conversely, Green Belt could be lost to “luxury housing” that does not meet local needs, under the guise of Grey Belt, that later fails to deliver its community benefits, e.g. 50% social housing.

There are reduced requirements for ‘medium’ housing developments, where 10-49 homes will be provided, and the site has an area of up to 2.5 hectares. But key is that the affordable housing requirement for these sites can be satisfied by a financial contribution rather than building social housing on-site. How this contribution will be calculated has yet to be defined but needs to be consistent and transparent. Furthermore, it is not clear whether the funds raised will be allocated to the housing development’s local government to fund local infrastructure investment or “disappear” into an unaccountable, central government pot. It should be the former.

DEFINITION OF GREY BELT CREATES UNCERTAINTY

The definition of ‘Grey Belt’ creates uncertainties around legal interpretation, methodology and consistency. The term “does not strongly contribute” is not a defined planning term and without a nationally mandated methodology the result

could be inconsistent decision making. It could lead to different outcomes across the country on similar sites.

A recommendation would be to introduce a mandatory, independent “Green Belt quality assessment”, before any site is downgraded to Grey Belt.

DEFINITION OF SUSTAINABILITY IS UNCLEAR

The draft NPPF states “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”.

How making locations ‘sustainable’ is not clear. If by adding a bus-stop or a cycle path makes a location sustainable, then edge of village sites are at risk to continual extensions into the countryside.

Development within a “reasonable” walking distance of a railway station which provides a high level of connectivity to jobs and services has a “default yes” including those within the Green Belt. (4 trains/hour. No prescribed distance but “reasonable” has been used to mean 800 metres or about a 10 minute walk).

Moreover, there is no real definition around the nature of the reasonable walking distance. More guidance is needed to reflect how the nature of the walk, not just the distance, might influence any decision. There is a vast difference if, for example, the walk is up steep inclines, along a very busy main road with high volumes of HGVs, on narrow pavements or there is no continuous path.

What is clear is that the sustainability of locations should be assessed in advance.

SAFEGUARDING LOCAL CHARACTER IS KEY TO SAFEGUARDING THE LANDSCAPE CHARACTER, OPENNESS AND BEAUTY OF THE GREEN BELT

FEDORA fully supports the stress that the NPPF puts on maintaining and safeguarding the landscape character, openness and beauty of the Green Belt.

Similarly, FEDORA supports a key NPPF aim to achieve sustainable development when it refers to “safeguard the intrinsic character and beauty of the countryside.” But when defining Green Belt boundaries plans FEDORA would urge that the draft NPPF should include villages where it is necessary to restrict development because of the important contribution the character of the village makes to the openness of the Green Belt.

Under improving the natural environment it states “Consider the environmental qualities of land proposed for development, including habitats, landscape character and the natural beauty of the countryside”. And when referring to housing densities it states “ the desirability of maintaining an area’s prevailing character”.

And yet, despite it being repeatedly used in the draft NPPF, “character” is not defined

TRANSPORT PROPOSALS CUT ACROSS LIMITS PLACED ON LOCAL ENGAGEMENT

The draft NPPF refers to embedding a vision-led approach to transport, which moves away from a 'predict and provide' approach. The following draft statements may seem reasonable:

- "Making sustainable transport part of early engagement with local communities, highway and transport authorities etc, so that proposals reflect local views, evidence relating to accessibility, capacity and transport service provision.
- All development proposals should be capable of proceeding without having a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety.
- Spatial development strategies and local plans may set out thresholds for what constitutes a significant amount of movement arising from new development, based on the circumstances of their areas"

However, it remains to be seen how they will be implemented in practice, especially bearing in mind the restrictions in the draft NPPF planned for participation by both local planning authorities and local residents in planning decisions.

NO GUARANTEE OF INFRASTRUCTURE DELIVERED ALONGSIDE OR PRIOR TO DEVELOPMENTS

There is no guarantee in the draft NPPF that the required infrastructure (road alterations, cycleways, GP's, schools etc) will be delivered prior to or alongside new developments. The NPPF needs to ensure housing delivery is legally linked to completion of essential infrastructure.

THREAT THAT MITIGATION OF DEVELOPMENT CLOSE TO NATURE SITES WILL BE DECOUPLED FROM THE LOCAL AREA

In the case of a site being in proximity to a specially designated nature site (SPA), previously developers often had to provide specific mitigation (like bespoke SANGs). The risk under the new system is that developers can meet their obligations by paying into a Nature Restoration Levy (NRL). This "pay-to-play" model might well decouple the impact of a development from the site in question.

Furthermore, how this contribution will be calculated has yet to be defined but needs to be consistent and transparent. It is not clear whether the funds raised will be allocated to the housing development's local government to fund local infrastructure investment or "disappear" into an unaccountable, central government pot. It should be the former.

CONCLUSION

It is only to be expected that with the lack of definition and safeguards these points will be litigated and tested through appeals, especially NDMP– Local Plan conflicts and Grey Belt assessments, only leading to delays and uncertainty in the meantime.

With this uncertainty, FEDORA believes that the proposed NPPF should include:

- Reinstating para (c) of the purpose of Green Belt to safeguard the countryside from encroachment
- Defining local character to safeguard the landscape character openness and beauty of the Green Belt
- An independent “Green Belt Quality Assessment” before any site is downgraded to Grey Belt
- A commitment that sustainability of locations of housing developments should be assessed in advance
- A guarantee that the required infrastructure (road alterations, cycleways, GP’s, schools etc) will be delivered prior to or alongside new developments
- A commitment to making NRL payments consistent and transparent, with the sums collected coupled to the housing development’s local government to fund affordable housing and/or investment in local infrastructure

Yours faithfully

Anthony Wolfe
Chair – FEDORA – the Voice for Oxshott CIC