

Response from South Woodham Ferrers Town Council to the NPPF 2025 Consultation appendix

South Woodham Ferrers Town Council welcomes the opportunity to comment on the proposed reforms to the National Planning Policy Framework (NPPF). We recognise the Government's intention to create a more rules-based, delivery-focused planning system. However, based on the material published in the consultation and the implications summarised in the accompanying councillor consultation document, the Town Council has significant concerns about how the proposed changes will affect South Woodham Ferrers, particularly in relation to infrastructure, local democratic influence, and the deliverability of planned growth.

1. Over-centralisation and the loss of meaningful local policy influence

The draft NPPF proposes that “local policies that conflict in any way with national decision-making policies get very limited weight” (from the councillor consultation document). This represents a substantial shift of power away from local planning authorities and communities.

South Woodham Ferrers is a distinct settlement with specific transport, flood risk, and infrastructure constraints. A framework in which national policies routinely override local policies risks undermining the ability of Chelmsford City Council and the Town Council to shape development in a way that reflects local character, capacity, and need.

The consultation document itself states that national decision-making policies are intended to “bear on the system from day one” and that inconsistent local policies should be given “very limited weight” (consultation document, Chapter 1). This creates a real risk that local design codes, infrastructure requirements, and settlement-specific policies will be overridden before updated Local Plans can be adopted.

2. A system that risks becoming developer-led rather than infrastructure-led

The Town Council is concerned that the proposed reforms prioritise the speed and volume of housing delivery over the coordinated provision of infrastructure.

The consultation document notes that the new presumption in favour of development is “very strong within settlements” and that refusal is only justified where harms “substantially outweigh” benefits. This significantly raises the bar for resisting poorly supported development.

At the same time, the consultation document does not introduce any new requirement for infrastructure to be in place *before* development proceeds. While Policy W1 encourages early engagement with utilities, it does not mandate infrastructure capacity as a precondition for growth. This is a critical omission for a town like South Woodham Ferrers, where:

- the single access road (Burnham Road) is already over capacity
- the rail station has limited peak-time capacity with no connecting trains from London after 9.15pm
- the Crouch estuary and local drainage systems create heightened flood-risk sensitivities
- GP and school capacity is already stretched

The northern growth area allocation was accepted locally on the basis that infrastructure would be delivered in tandem with housing. The proposed NPPF weakens the mechanisms that ensure this balance.

3. Implications for the Northern Growth Area and future development pressure

The consultation document states that the strategic allocation north of the town “becomes even more important” because it is deliverable, unconstrained by Green Belt, and rail-linked. It also warns that if Chelmsford cannot meet its higher housing requirement, national policy may push for:

- “higher densities within the SWF allocation”
- “additional edge-of-settlement sites”
- “intensification around the station and town centre”

These outcomes would place significant pressure on the town’s limited transport network and local services. The proposed minimum density requirements around stations (40–50 dph) are not appropriate for a small rail-linked town with a constrained road network and limited employment base.

The Town Council is concerned that the reforms effectively pre-determine South Woodham Ferrers as a growth location without adequate regard to infrastructure capacity or local planning strategy.

4. Reduced consultation timeframes and pressure on communities

The consultation document acknowledges that the Government intends to “accelerate plan production” and reduce the time available for plan-making. While efficiency is welcome, the practical effect is that:

- communities have less time to understand and respond to proposals
- parish and town councils face increased pressure to react quickly with reductions in consultation periods
- complex technical evidence (flood risk, transport modelling, viability) may not be scrutinised adequately

Given the scale of change proposed, the Town Council believes that shortening consultation periods risks undermining public confidence in the planning system.

5. No measures to address land-banking or unused permissions

The consultation document notes that the presumption in favour of development will apply automatically if the five-year housing land supply falls short. However, the draft NPPF does not include any mechanism to ensure that developers build out sites for which they already have permission.

This omission risks creating a perverse incentive:

- developers can delay build-out
- the housing land supply appears weaker
- the presumption is triggered
- additional speculative applications are approved

This cycle has been observed in other authorities and could easily occur in Chelmsford, placing further pressure on South Woodham Ferrers.

The Town Council strongly urges the Government to introduce measures that require or incentivise timely build-out of consented sites before additional land is released.

6. Flood risk, climate resilience and the Crouch estuary

The consultation document highlights strengthened national policy on surface water management, green/blue infrastructure, and flood resilience. The Town Council welcomes this direction, particularly given the sensitivities of the Crouch estuary and the town's low-lying topography.

However, the strengthened policies must be matched by:

- enforceable requirements for SuDS adoption and long-term maintenance
- robust modelling of cumulative impacts from multiple developments
- clear guidance on how climate-change allowances should be applied in estuarine environments

Without this, the risk of downstream impacts on the Crouch and local drainage systems remains significant.

7. Transport and accessibility concerns

The draft NPPF places strong emphasis on rail-linked intensification and active travel. While these principles are sound, they do not reflect the realities of South Woodham Ferrers:

- the rail line is single-track beyond Wickford
- peak-time services are already at capacity
- the town's road network has no alternative access route
- bus services are limited and vulnerable to commercial withdrawal

The Town Council is concerned that national policy assumes a level of transport capacity that does not exist locally and cannot be delivered without major investment.

8. Summary and requested changes

South Woodham Ferrers Town Council supports the principle of a clear, consistent planning framework. However, we believe the draft NPPF requires significant amendment to avoid unintended consequences for communities like ours.

We therefore request that the Government:

1. Rebalance the framework to ensure infrastructure-led development, including explicit requirements for infrastructure capacity to be demonstrated before permissions are granted.
2. Retain meaningful weight for local policies, particularly those relating to design, infrastructure, and settlement character.
3. Introduce measures to prevent land-banking, including build-out conditions or penalties for non-delivery.
4. Provide flexibility on minimum density requirements for small rail-linked towns with constrained transport networks.
5. Ensure consultation periods remain sufficient for communities and parish councils to engage meaningfully.
6. Strengthen flood-risk and climate-resilience requirements for estuarine and low-lying settlements.

South Woodham Ferrers is willing to play its part in meeting Chelmsford's housing needs, but this must be done in a way that is sustainable, infrastructure-supported, and locally responsive.