

Maldon District Local Development Plan Review Growth Options 2025

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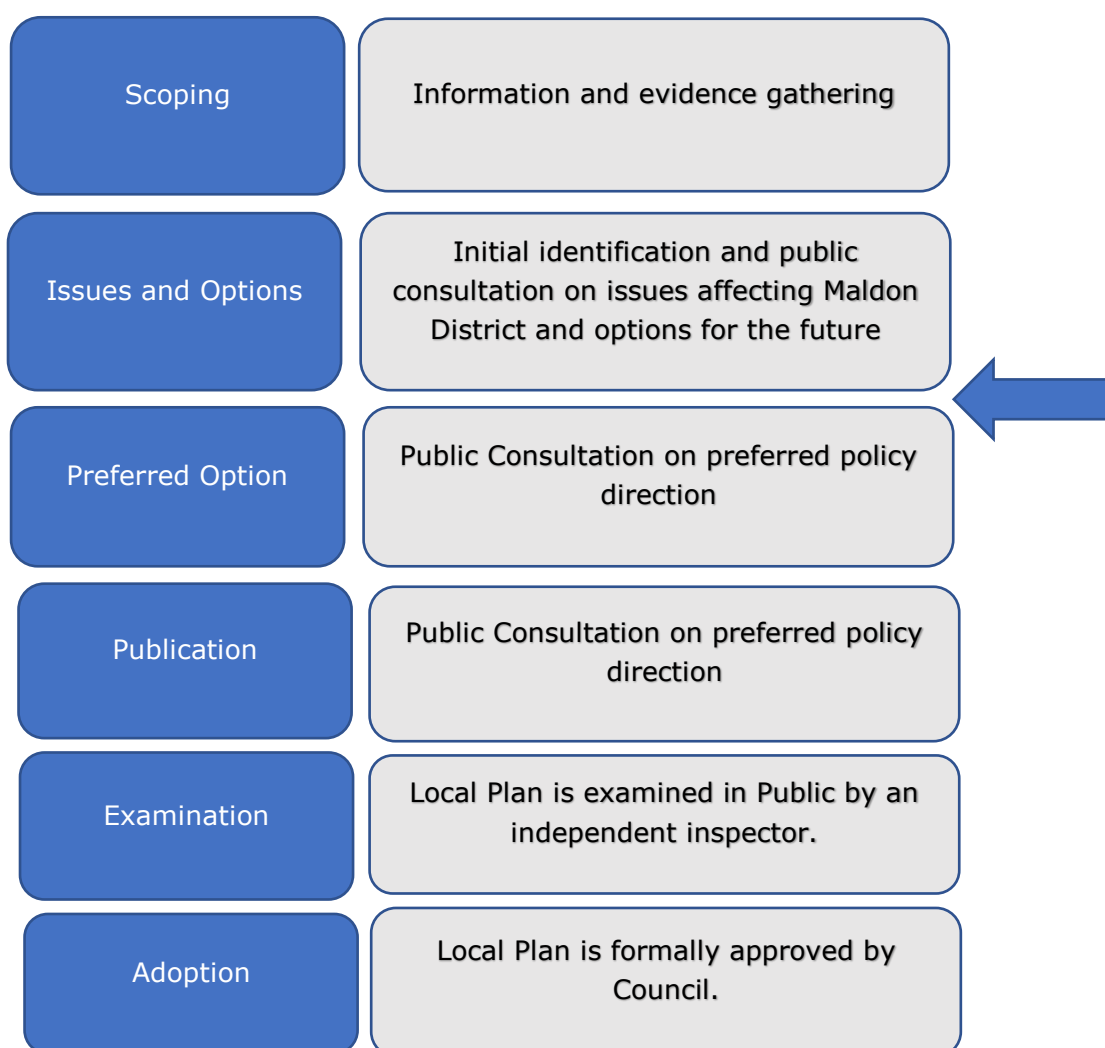
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1.0 INTRODUCTION

- 1.1 All Local Planning Authorities have to prepare a Development Plan called a Local Plan. This document alongside the Minerals Local Plan and Waste Local Plan (prepared by County Councils) and Neighbourhood Plans (prepared by Parishes or Neighbourhood Areas) forms the statutory “Development Plan” and is used as the starting point in the determination of planning applications. It sets out how an area can meet its growth needs for matters such as new housing and employment development. All Local Plans must consider the National Planning Policy Framework (NPPF) when they are prepared, including having a spatial strategy which directs where this growth will go and allocates land so that it can be developed. Local Plans also contain more detailed policies to guide how councils will make decisions on planning applications. The plan covers all types of development, from housing to employment, shops, infrastructure (transport, health, schools, green spaces) and community facilities. There are a few exceptions including how marine, waste and minerals and national strategic infrastructure projects (NSIPs) will be catered for. These exceptions are dealt with in separate plans and strategies prepared by other organisations.
- 1.2 Maldon District Council’s Local Development Plan (LDP) is a Local Plan and was approved by the Secretary of State following an Examination in Public by the Planning Inspectorate in 2017. The present LDP covers the period 2014 to 2029 and applies to the whole of Maldon District. From this point on in reports the term Local Plan Review will be used to bring the Council in line with national terminology.
- 1.3 The Local Plan (LP) Review has a number of formal statutory stages to pass through which will take place over the next few years. This includes consultation on draft versions of the Plan. The Issues and Options document was the first formal, but non-statutory consultation in the plan-making process. Its main purpose was to ensure that the Plan scoped and identified the main issues for those parts of the Plan that the Council is reviewing and that all suitable alternative options for accommodating change were considered. The consultation ran from the 17th January to the 14th March 2022. 23,400 comments were received from 490 respondents including the public, statutory consultees such as neighbouring authorities, Parish Councils, Essex County Council, the NHS, Environment Agency, Marine Management Organisation and special interest groups including developers and landowners.

1.4 The stages in the creation of a Local Plan are set out below.



The blue arrow denotes where in the process the Council presently is.

1.5 To recap, the Council put forward in the Issues and Options Consultation seven high-level growth options for consultees to consider. These were:

OPTION 1 – Retain the option in the LDP approved in 2017 – focus growth in the settlements of Maldon/Heybridge¹ and Burnham-on-Crouch.

OPTION 2 – A strong focus on the towns and larger sustainable villages

OPTION 3 – Growth generally focused on the towns Maldon/Heybridge and Burnham-on-Crouch and all the large villages of the Settlement Pattern.

¹ Maldon and Heybridge are two separate administrative areas in terms of town and parish councils and the Council would continue to support this, but for the purposes of the LDP and the built form they operate contiguously and therefore appear in this document as either Maldon/Heybridge or Maldon and Heybridge and are referred as a town in the Settlement Pattern.

Option 4 – Pepper pot growth throughout the Settlement Pattern (Spread the growth across all the sustainable settlements in the District)

Option 5 - Create a new satellite settlement or large urban extension bolted onto one of the towns, larger villages and/or settlement adjacent to the District boundary.

Option 6 - Focus growth in the north of the District to link into the service and facilities available in Tiptree, Witham and Maldon/Heybridge.

Option 7 – Focus growth along the rail line to Althorne, North Fambridge and Southminster.

- 1.6 There were two specific questions asked during the consultation that covered the growth options; these were:

Question 15. Which growth option do you consider to be the most appropriate for the District of Maldon?

Question 16. Do you believe that there is another suitable growth option for the District, perhaps a combination of any of the above? Please set out your views.

- 1.7 There were a number of responses to these questions; 327 to question 15 and 242 to question 16. 142 respondents in question 16 thought there was another option to consider, however, none of them put forward one and they were just combinations of the options already put forward or a repeat of the answer to question 15.
- 1.8 Many of the responses were around the fact that responders did not want any more growth either overall or in their settlement. It was apparent in the responses that more respondents made comments from the south of the District than the north and this gives the Council a challenge of ensuring it does not place bias to this when determining a growth option given this pattern.
- 1.9 Whilst these types of comments are important to those making them, not wishing to see a settlement grow or not wanting any more growth in general in the District is not an option that the Council can consider when making decisions regarding the Local Plan. When making the decision about which direction the Local Plan will take in regard to choosing a growth option, the Council has a statutory duty to produce a sound Local Plan which sets out how it is going to deliver its full identified growth. That choice needs to be made not by how many like or dislike each option but by evidence to either support or discount it. This also applies to those respondents who were using the consultation to promote a growth option based solely on the fact that there was what they deemed to be a suitable site within it to develop. Whilst helpful to know where land is being promoted, and the amount of land overall is important, individual sites are not relevant at this stage in the process.

- 1.10 The 7 options were distilled down to three options following on from an All-Member briefing workshop on the 12th July 2023 and a report to Council on the 14th September. These were:
- 1. Pursue further testing for Option 3 – Growth generally focused on the towns Maldon and Heybridge and Burnham-on-Crouch and all the large villages of the Settlement Pattern.**
 - 2. Pursue further testing for Option 5 – A large urban extension bolted onto the existing settlements in the District and adjacent to the District boundary in combination with Option 3 - Growth generally focused on the towns Maldon and Heybridge and Burnham-on-Crouch and all the large villages of the Settlement Pattern.**
 - 3. Pursue further testing for Option 7 - Focus growth along the rail line to Althorne, Burnham-on-Crouch, North Fambridge and Southminster in combination with Option 1 - Retain the option in the LDP approved in 2017 – focus growth in Maldon and Heybridge. (Burnham-on-Crouch is part of Option 7)**
- 1.11 It was also agreed not to pursue the following two options.
- Option 4 – Pepper pot growth throughout the Settlement Pattern (Spread the growth across all the sustainable settlements in the District).**
- Option 6 – Focus growth in the north of the District to link into the service and facilities available in Tiptree, Witham and Maldon and Heybridge.**
- 1.12 From this point on in this paper the Options will be numbered as set out above.
- 1.13 At the same time consideration was given at the All-Member briefing workshop in regard to the length of the plan period, where it was felt appropriate to have a plan period of 20 years with a housing requirement above the national standard method.
- 1.14 The rationale at the time for this was because of a presumed need, raised by Essex County Council through the Issues and Options Consultation to provide an additional secondary school in the District. This provision would mean that the Council would need to find a site large enough to accommodate a secondary school (10 hectares) and land sufficient to accommodate a minimum of 4,500 homes to help fund the school. This would have been in addition to the existing commitments with planning permission contributing towards the delivery of the LDP 2014-2029. The figures used at that time are set out in the table below.

Table 1 - Previous Housing Figures pre December 2024

Homes to be allocated	4,500
Existing commitments as at June 2024	2,896

Total amount of growth over the 20-year plan period	7,396
Homes to be delivered in the District per annum	369

- 1.15 It was agreed that Officers would commence discussions with statutory consultees and move towards a position of being able to test Options 3, 5 and 7.
- 1.16 Since September 2023, however, there was a general election in July 2024 which resulted in a change of Government. This change has resulted in major changes to National Planning Policy, as set out below.

2.0 WHAT HAS CHANGED SINCE SEPTEMBER 2023?

- 2.1 **National Planning Policy** – The Government, on taking office, immediately announced that it would be amending the National Planning Policy Framework (NPPF) and the Planning Practice Guidance. They stated that they were going to amend the Standard Methodology for the calculation of housing need and wanted to deliver 1.5 million homes over the period of the Parliament and that housing delivery should increase. Though the Council continued to work on its policies, the work on the growth part of the Local Plan was halted because it was judged that the proposed changes to the Standard Method could have a fundamental impact on the amount of growth the Council would have to provide going forward.
- 2.2 On the 13th December 2024 the Government published an amended version of the NPPF. They also amended the methodology for the Standard Method. The detail for the amended methodology is set out below at Section 3. It resulted in the amount of housing that the Council is going to have to consider in its Local Plan increasing from a need of 276 per annum to a mandatory target of 575 per annum. This change in the way the Standard Method is calculated took effect from the date of the publication of the NPPF.
- 2.3 The immediate result of this change was a reduction of the District's 5-year housing supply. It has dropped from 6.3 years to 2.7 years. It also meant that the Council has had to consider a significantly higher housing target for the Local Plan Review.
- 2.4 **Infrastructure** - This was always the key issue in the District; it came out as the top concern in the Issues and Options consultation and consistently is a matter which both the public and Members raise as a serious issue. The present approved Local Development Plan has an Infrastructure Delivery Plan accompanying it and some of the infrastructure in that Plan has and is being delivered (e.g. Limebrook Way Primary School and Early Years Nursery, Maldon, North Heybridge Relief Road, various allotments, open space, funding for youth facilities, etc). Two of the main pieces of infrastructure in the IDP which relate to the currently under construction South Maldon Garden Suburb, however, have yet to be started in a commissioning or consent sense. These are:
- the South Maldon Relief Road (SMRR) and
 - the NHS Health Hub

Both of the above pieces of infrastructure are in Maldon, though the NHS Health Hub is expected to be able to serve a wider area than just the town.

- 2.5 The health hub is vital in terms of health infrastructure delivery in the District. This piece of infrastructure was to facilitate a move and expansion of the Blackwater Surgery, presently located on Princes Road, Maldon. The surgery,

whilst growing slightly at its existing site using S106 funding, needs to move from its present location to deal with an expanding patient roster.

- 2.6 A site was allocated in the LDP for a community health use on strategic allocation Site S2b, off Wycke Hill, Maldon. There is, at this point in time, delivery constraints with the site. It does not have a developer on board, and it has land ownership issues, which as far as the Council knows have yet to be resolved in favour of bringing Site S2b forward for any form of development. The land designated for a community health use has access issues as it is reliant on at least part of the South Maldon Relief Road coming forward. The Relief Road, which in itself has issues with a large funding gap, despite S106 contributions being collected to help pay for it. The cost of the provision of the health hub has not been factored into any Infrastructure Delivery Plan yet. Discussions at this point with the NHS have suggested previous estimates were looking at a facility costing an unknown figure, but it will be in the millions; although this is understood to assume some form of acute health provision will be included. A primary care facility for the Blackwater Surgery would cost much less, but not deliver the Health Hub's aspirations. Site S2b is too small to have the value uplift capacity itself to provide health contributions to fund the health hub, alongside other contributions. Therefore, the Council could technically be looking at needing an alternative site for the Health Hub if this is to remain the favoured solution. Alternatively, it may have to try to make up some of the funding for it from either other S106s or CIL. In terms of the gaps in funding identified on the Health Hub and SMRR, it will be a serious consideration for the Council that the majority of infrastructure funding via CIL could be directed toward these matters to unlock the benefits, which is unlikely to leave funds for very much else.
- 2.7 Another matter which has arisen since the Council's decision about the LDP options for growth is that the NSIP for the A12 widening between Junction 19 at Chelmsford and Junction 25 at the Marks Tey A120 Interchange near Colchester was approved by the previous Government's Secretary of State. The new Government is in the process of reviewing major national infrastructure projects and this is one of those being reviewed. Despite this there is now a need to consider the provision of a Maldon Link Road/ Hatfield Peverel bypass, alongside Braintree District Council and ECC and this has therefore become a higher priority than it was in September 2023.
- 2.8 We have to consider the above issues given they have emerged or become more apparent since September 2023.

3.0 WHAT IS THE MINIMUM AMOUNT OF GROWTH?

- 3.1 The starting point for the determination of the requirement of housing is derived from the national Standard Method. As set out above, the Government changed the Standard Method on the 13th December 2024. Previously, the Standard Method calculation for Maldon for the year (2024/25) resulted in 276 dwellings per annum, this included the affordability uplift that was part of those calculations. The Government at the time were still using the 2014 sub national household projections (SNHP) for the calculations within the Standard Method. Using these figures, the Local Housing Needs Assessment (LHNA) (2021) with an adjustment for suppressed household formation (using 2008-based data), estimated that the housing need in Maldon District would be around 197 homes per annum. This was actually only 6 homes per annum more than the 10 years' worth of growth per annum set out in the Standard Method calculation, which for 2024/25 was 191 homes per annum and demonstrates that at this time the Standard Method result was roughly the same as actual need in the District. The additional affordability ratio used in the Standard Method then brought the annual housing requirement up to the 276 per annum.
- 3.2 The changes to the Standard Method mean that instead of using household projections, as per the previous Method, it now pins the housing target to 0.8% of the District's housing stock, which for 2024/25 is 29,918, with an uplift for affordability.
- 3.3 The adjustment to take into account affordability is calculated by using the [median workplace-based affordability ratios](#), published by the Office for National Statistics at a local authority level. The mean average affordability over the five most recent years for which data is available should be used. For each 1% the ratio is above 5, the housing stock baseline should be increased by 0.95%. Maldon District's affordability ratio is at the present time 12.38.

The adjustment factor is calculated as:

$$\text{Adjustment factor} = \left(\frac{\text{five year average affordability ratio} - 5}{5} \right) \times 0.95 + 1$$

$$\text{Adjustment factor} = \left(\frac{9 - 5}{5} \right) \times 0.95 + 1 = \left(\frac{4}{5} \right) \times 0.95 + 1 = 0.8 \times 0.95 + 1 = 1.76$$

The effect of these calculations is a housing target for the District of **575** homes per annum.

- 3.4 575 dwellings per annum would equate to approximately 8,625 dwellings over a 15-year plan period. The NPPF states at paragraph 22 that Local Authorities should have a minimum plan period of 15 years from the date of the adoption of their local plans. Paragraph 22 states that.

“Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery”

And Paragraph 72 states.

“Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

a) specific, deliverable sites for five years following the intended date of adoption; and

b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.”

- 3.5 It is proposed to try and submit the Plan for examination in August 2027. It is not possible to determine how long the examination will run for, but it is hoped that adoption of the Plan can take place before the 31/3/2028. That means that the 15 years Plan Period mandated in the NPPF would start from 1/4/2028 to 31/3/43.

Plan Period 2028 - 2043 15 x 575	8625
5% buffer	431.25
Less Completions	0
Subtotal	9056.25
Plus estimate of under supply from 2024	845
Less estimate of existing commitments	3000
Subtotal to Allocate	6901.25
Windfall sites over 1.0ha in size	825
Total	7726.25

Table 2 - Approximate Growth Figures 2023 - 2043

Note: Table 2 has two estimates in it. Firstly, a new plan period will not have any completions so this figure at the moment is nil. Secondly, we do not know how many commitments we will have in 2028, as the time for submission approaches this figure will be clarified but at the moment it is an estimate and it given the fact the Council does not have a 5YHLS and is in the tilted balance for decision making the commitment figure is unlikely to go below 3000.

- 3.6 The amount of buffer applied is a matter for the Council to consider. An Inspector examining the Council's plan will expect to see an amount applied. The NPPF is clear that a buffer should be applied to any housing target. At the moment the District would be classed as a 5% buffer district because we are meeting the Housing Delivery Test. That means we have been meeting and exceeding our housing target. However, with the higher housing target set out in the amended Standard method, the District has in 2024/25 gone into undersupply in regard to housing delivery and this is most likely going to continue for the foreseeable future. There is therefore a high chance that the District will become a 20% buffer authority. In order to de-escalate that risk to the site allocations and Local Plan Examination, the Council does not have enough land of the right size to allocate 10% of its sites under 1.0 hectare in size. Therefore, it is proposed that a windfall allowance be put into the Plan, the details of how to deliver it to be discussed and approved. This allowance should be that which is proposed for the 5YHLS because the Council has the evidence to support that allowance, and this allowance could be constrained in policy to sites that are under 1.0 hectare in size. This would be for 15 years $55 \text{ housing units} \times 15 = 825 \text{ homes}$. This windfall allowance could bridge the gap between the 5% and 20% buffers if it became necessary.
- 3.7 In terms of economic growth, the LHNA (2021) shows an estimate of the number of jobs that would be supported by projected population growth. Incorporating a number of assumptions around economic participation, commuting, double jobbing and unemployment, it is concluded that housing delivery in-line with the previous standard method would be likely to support around 4,200 additional jobs (2020-40). This may increase with the uplift to the housing target and is a matter that the consultants updating the Local Housing Needs Assessment will address.
- 3.8 The standard method would support sufficient labour supply growth and there is therefore no economic-led requirement to increase local housing need over and above the Standard Method. It is not anticipated at the moment that this will change.

4.0 UNCHANGED MATTERS

- 4.1 There are some matters which relate to all the options put forward in the Issues and Options Consultation and which have not changed since September 2023. In brief these are set out below.
- 4.2 **Affordable Housing** - None of the options can provide for the full amount of affordable housing forecast as being needed. As per the LHNA 2021 there was an identified need for 172 affordable homes per annum. This may change with the 2025 Local Housing Needs Assessment Update, but it is unlikely to go down. Over a 15-year plan period this would equate to a need to deliver approximately 2,580 affordable homes. The higher housing target may assist in this delivery.

The Council may have to allocate some additional sites for either 100% affordable housing or a mix of open market and affordable housing and/or have very robust positive policies in place to enable delivery of affordable homes in other suitable locations, outside any strategic allocations to try and make up any shortfall.

Planning Inspectors expect local authorities to leave “no stone unturned” with regard to delivering affordable housing. This means that the Council will have to work hard to demonstrate to the Examination Inspector that it can ensure the maximum delivery across the Plan period. As part of the evidence base of the Local Plan Review, the Council has commissioned an Economic Viability Assessment. This piece of work is going to re-examine the amount of affordable housing we can request from developers to assess whether we can increase the amount per site to help address any shortfall.

- 4.3 **Smaller sites of less than 1.0 hectare** - The NPPF requires Local Plans to ensure 10% of the housing requirement is delivered on sites of less than 1 hectare. Based on the Maldon District Housing and Economic Land Availability Assessment (HELAA) data, none of the options can supply enough land to provide 10% of the housing requirement on sites of less than 1.0 hectare. This is even the case if we add in sites of 1.0 hectare or less which *already* have planning permission. There is a shortfall in every case. The Government are discussing the production of a small site national policy, however, prior to that it is likely that the Council will have to have some kind of windfall policy to address this requirement. 10% of the housing requirement will be approximately 861 housing units. This is very near to the windfall allowance recommended for the 5YHLS at 55 units per year or 825 units over a 15 year period.
- 4.4 **Brownfield land** - The term ‘brownfield’ land means land which is, or was, developed previously. As the term ‘developed’ has a legal meaning, there are exclusions in national policy which include agricultural buildings, mineral extraction areas, waste disposal or landfill, land in built-up areas including parks, allotments and recreation grounds and also residential gardens. As

Members were shown at the All-Member briefing in 2023, none of the options provide for very much land at all in terms of brownfield land. This is to be expected in a District like Maldon which does not have the traditional redundant industrial workings or vacant office blocks which form supply in other council areas. The majority of brownfield land the District did have has already been developed either for employment or some residential use. This lack of brownfield land will not impact on the Plan's soundness at Examination; it's a land type we cannot create. We should as a matter of course however, and as good practice, consider suitable brownfield sites first in any of the chosen options, including whether by specifically allocating them for residential development to help them come forward. Detailed housing policies can also assist in bringing forwards windfall development on brownfield sites.

- 4.5 Another way of ensuring that disused brownfield land does not impact on residential and visual amenities in areas of high flood risk is to try and allocate identified land in these areas and ensure that policy is flexible enough that given the right criteria this type of land can come forward in the future. The Council is working with the Environment Agency on this issue.
- 4.6 **Flood risk** - In 2021, the Council commissioned a Strategic Flood Risk Assessment (SFRA) for the District, to update the last assessment undertaken in 2007. An All-Member briefing was held on 19th July 2024 to reveal its findings and recommendations for planning policy and practice, as well as emergency planning. The flood risk maps for the updated SFRA have been checked by the Policy Team, against the settlements of the District and apart from Steeple, Heybridge Basin and Bradwell Waterside, which have substantial flood risk, there are no settlements which could not accommodate some level of growth due to flood risk. This information will be rechecked once the maps have been updated (The Environment Agency published new updates to their information as the Council was completing its SFRA) Any major sites which fall wholly into flood risk areas will therefore be discounted (except those brownfield ones as discussed above at 4.5).

5.0 THE OPTIONS DISCOUNTED ON THE 14TH SEPTEMBER 2023

- 5.1 There were two options discounted at the 14th September 2023 Council meeting. Given the passage of time it is appropriate that the Council reviews the reasons these two options were discounted. They were.

Option 4 – Pepper pot growth throughout the Settlement Pattern (Spread the growth across all the sustainable settlements in the District)

And

Option 6 - Focus growth in the north of the District to link into the service and facilities available in Tiptree, Witham and Maldon/Heybridge.

- 5.2 **Option 4 – Pepper pot growth throughout the Settlement Pattern (Spread the growth across all the sustainable settlements in the District)**

- 5.3 The issues raised in the previous paper presented to Council on 14th September have not altered with regard to this option. There is, however, enough land to deliver the housing requirement in this option.

- 5.4 There was a lack of support for this option in the Issues and Options consultation from the statutory consultees, although this is not a reason in itself to discount an option, because their rationale maybe guided by their organisational considerations. However, it is important to consider what they are saying and whether it has credence, particularly given we have a legal obligation to work with them for strategic and cross-boundary matters under the Duty to Cooperate. Neighbouring local authorities are concerned that if the Council directs growth to all the settlements, then we would be unable to provide for our own infrastructure, which then places pressure on theirs, particularly around education and health services. The County Council and NHS are concerned that spreading the growth to settlements which are unsustainable would make it more difficult to deliver their services as the need would be distributed around the District. There will also be a need to consider primary school and early years provision alongside growth, which will also be difficult to secure if infrastructure payments are limited as a result of pepper potting. Given the increase in the housing target these concerns would still be justified and it would in effect mean more growth spread around the District, to which the County Council and the NHS would have to provide services, thus stretching their resources.

- 5.5 Given the level of concern raised among many of the consultees regarding infrastructure delivery and that it is a key consideration, the question must be asked whether this option can deliver economies of scale to ensure that there is not a deficit in infrastructure funding. If the Council pepper-pots the growth to all the settlements, whilst it may appear to a degree to limit the impact of that growth in terms of visual impact as well as all parts of the District taking a 'share' of the growth; this is not an adequate planning reason to continue with this option. The risk of infrastructure not being funded is high, particularly with

regard to the ability to bring forward large items of infrastructure such as schools or highway/public transport improvements, and a centralised health provision. The Council would definitely have to look to adopt CIL if this option were to be supported. This is because there would be a watering down of the economies of scale needed to deliver large items of infrastructure. Also, Members should be aware that even with this option, some settlements will still be allocated substantial amounts of growth because pepper potting does tend to mean that growth goes where the sites are. Therefore, settlements with no land coming forward would not receive any allocations whilst those settlements with large sites, no matter how large or small the settlement is, would have to be considered.

- 5.6 **Analysis of Option 4** - There is sufficient land in this option to allocate the residual housing requirement for a 15-year plan period. The option does allow for the delivery of the affordable housing target.

This option could in effect allocate land in the towns, large, medium and small villages some of these settlements do not even have basic shopping for everyday needs, they have no access to a railway station or bus services, and it may not be possible to provide a bus service if a settlement is particularly isolated. Some of these settlements do not even have roadside pavement linkages. Therefore, this option could increase rural isolation and would have to come with a comprehensive funded transport strategy – as part of an Infrastructure Delivery Plan, to ensure that future residents could access higher order settlements for their essential needs. ECC are likely to be reluctant to fund this scale of intervention if other options were available for the Council to choose from that present more affordable or sustainable transport solutions. There is a risk, albeit unknown at this time, that the cost of this kind of provision alongside other infrastructure provision could make the LP Review unviable, which would mean it is found unsound at Examination. There is also a risk that taking forward this option would result in objections from the Council's Duty to Co-operate partners at the Examination, objections which the Inspector would, given that sustainability is a key tenant of national planning policy, most likely support. Failure of the Duty to Cooperate is not recoverable once the LP Review is submitted.

- 5.7 Overall, there is no fundamental change to the constraints and issues around this option that mean we should consider it again for the distribution of growth at this time and it remains discounted.
- 5.8 **Option 6 - Focus growth in the north of the District to link into the service and facilities available in Tiptree, Witham and Maldon/Heybridge.**
- 5.9 To date, the Council has struggled to identify enough land to accommodate this option, despite a further extension to the call for sites ending on the 15th August 2023, including placing an advert in the national Estates Gazette. A large site for approximately 300 dwellings came forward recently on the edge of Great Totham South but this has been discounted on landscape grounds.

Most of the District's wooded areas and local wildlife sites are in the north and also the Great Braxted Estate takes up approximately 200 hectares of land, which is more wooded or managed under positive land management including for biodiversity net gain.

- 5.10 With a higher housing figure and excluding Maldon/Heybridge there is still not enough land in the north of the District to satisfy the requirement of 5,684 houses. Even with Maldon and Heybridge factored in, there is still not enough land.

	Households	% of Households	New Target	Land available (Practical Sites)
Settlements				
Maldon/Heybridge	6,691	64.50	3666.05	2426
Great Totham South	1228	11.84	672.83	350
Tolleshunt D'Arcy	455	4.39	249.30	58
Tollesbury	1191	11.48	652.56	663
Wickham Bishops	809	7.80	443.26	90
Total	10,374	100.00(rounded)	5684.00	3587

Table 3 - Approximate Growth Figures for Option 6

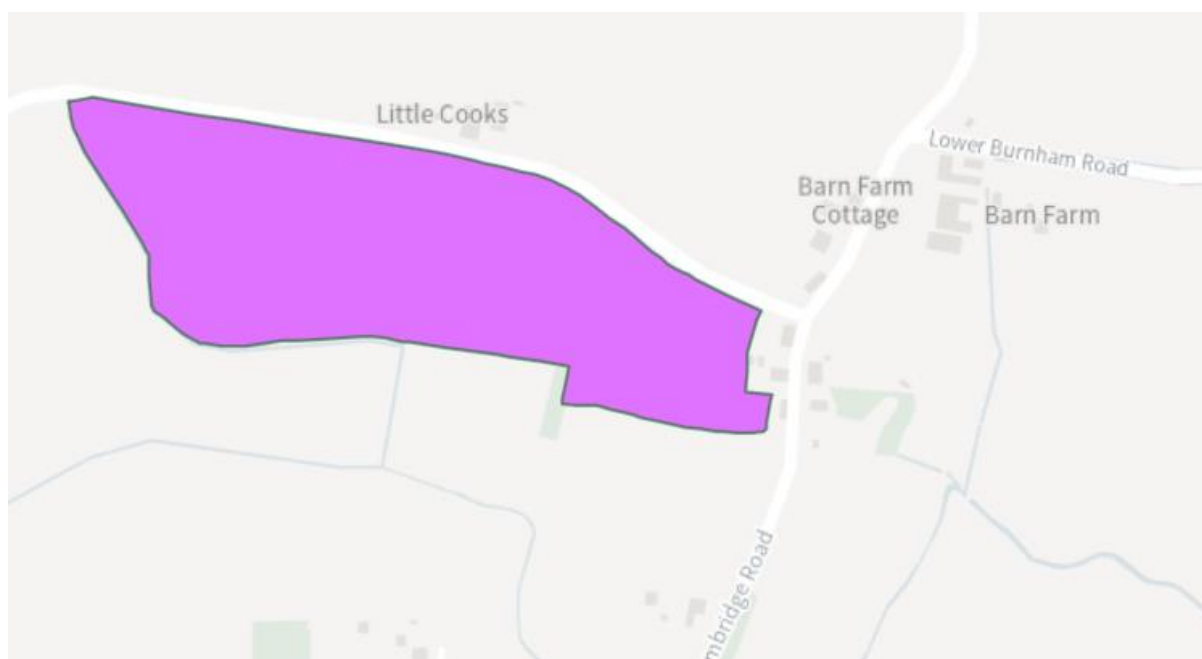
- 5.11 The table above sets out the number of households in the northern part of the District in the larger villages and Maldon and Heybridge. Using the % of total households to show the amount of housing needed in each settlement it demonstrates that practically the District would only be able to accommodate 3,587 houses, compared to the housing target of 6901 houses.
- 5.12 In regard to this option there are also concerns raised from National Highways concerning the impact on the operation of the A12, part of the Strategic Road Network. This is the only option on which they have commented. Whilst it is not known at this time what the new Government will decide with regard to the A12 widening scheme, the Council has to presume, until informed otherwise, that it is going ahead. As with all the other options, highway impact has been raised as an issue and this would be assessed through transport modelling. The Danbury AQMA has now been lifted but if the Council chose to place additional growth in the north of the District this then may become an issue again for Chelmsford City Council.
- 5.13 Colchester City Council have objected to this option because of the impact on the infrastructure in and around Tiptree; they have commented that settlements could coalesce and there could be a disproportionate amount of affordable housing in one area. The last two reasons are currently unsubstantiated as there are no plans or discussions about the coalescence of settlements which are not already in this position, and it is unclear how that could happen or why it would impact on Colchester City's area. With regard to the comment on affordable housing, they may be concerned that there would

be a disproportionate distribution of housing, focusing it all in one part of the District to the detriment of the rest of the area. The impact on Tiptree is a cause for consideration, as is the impact on Witham, which Braintree District Council are concerned about because both settlements are already planned for in terms of growth and infrastructure. This effectively means that any infrastructure impact on those settlements would have to be funded from developer contributions in Maldon District which would mean it would not be available to be spent in the Maldon District itself, but this is not a reason to discount this option without further investigation.

- 5.14 **Analysis of option 6** – On its own without any other option, so without Maldon and Heybridge being added into the option, this option would not deliver the housing requirement. Even if Maldon and Heybridge is added into the option it would still fall short of the amount of land needed to deliver.
- 5.15 With this option and in regard to the impact on Tiptree and Witham, there is a risk in that because both of these settlements are already planned for in terms of housing and infrastructure requirements. Therefore, by taking this option forward, any additional identified pressures would have to be funded by developer contributions from sites within the northern part of the District. This would effectively mean funding for new infrastructure provision would go out of the District into the adjacent areas where the impact is felt; as a Duty to Cooperate matter. This could impact on the District's ability to fund other infrastructure within the area, such as contributions toward the health hub and South Maldon Relief Road. This option could also place a disproportionate amount of growth in Tollesbury and Great Totham South because they are the two settlements with the most land put forward in the north.
- 5.16 Overall, there is no fundamental change to the constraints and issues around this option that would mean we should consider it again for the distribution of growth at this time and this option remains discounted.

6.0 THE OPTIONS PUT FORWARD FOR FURTHER CONSIDERATION ON THE 14TH SEPTEMBER 2023

- 6.1 There were three options that the Council considered that should be taken forwards. As with the discounted options above, given the passage of time it is appropriate that the Council reviews the reasons these three options were considered for taking forward for further work. They were:
- 1. Pursue further testing for Option 3 – Growth generally focused on the towns Maldon and Heybridge and Burnham-on-Crouch and all the large villages of the Settlement Pattern.**
 - 2. Pursue further testing for Option 5 – A large urban extension bolted onto the existing settlements in the District and adjacent to the District boundary in combination with Option 3 - Growth generally focused on the towns Maldon and Heybridge and Burnham-on-Crouch and all the large villages of the Settlement Pattern.**
 - 3. Pursue further testing for Option 7 - Focus growth along the rail line to Althorne, Burnham-on-Crouch, North Fambridge and Southminster in combination with Option 1 - Retain the option in the LDP approved in 2017 – focus growth in Maldon and Heybridge. (Burnham-on-Crouch is part of Option 7).**
- 6.2 Taking the options in the reverse order:
- 3. Pursue further testing for Option 7 - Focus growth along the rail line to Althorne, Burnham-on-Crouch, North Fambridge and Southminster in combination with Option 1 - Retain the option in the LDP approved in 2017 – focus growth in Maldon and Heybridge. (Burnham-on-Crouch is part of Option 7)***
- 6.3 With regard to this option: Since the Council report in 2023, the Council has had the Local Wildlife Sites confirmed via a Nature Conservation Study, a piece of work which is part of the evidence base of the LP Review. One of those wildlife sites (Ma47) is North Fambridge Woods.



Ma47 North Fambridge Woods

- 6.4 This site lies to the west of the single access into North Fambridge from the B1010/B1012 onto Fambridge Road. Growth at North Fambridge would, it is believed, entail an upgrade to that junction. It is not clear to what extent at the moment, but it would mean a change in the junction to make it safer and the settlement more accessible. That upgrade could impact on both the dwellings around the junction and the adjacent wildlife site. At the present time it is difficult to turn out of the junction when leaving North Fambridge and difficult to turn down onto Fambridge Road into the settlement. The Council is unlikely to support any loss or impact on the wildlife site and would be concerned about the impact on the neighbouring residents.
- 6.5 North Fambridge could have provided approximately 930 dwellings. The settlement is covered by the Latchingdon WRC (Water Recycling Centre). Anglian Water have commented that there is no headroom available to accommodate wastewater flows at Latchingdon WRC and there are significant network constraints. No investment has been identified by Anglian Water for their AMP8 2025 – 2030 business plan for growth. The network constraints draining to Latchingdon WRC, are essentially that any development in a flood risk area or requiring sewerage to traverse a flood risk area is a significant constraint. Anglian Water assessment for the network capacity is red for this WRC. They have informed the Council that this matter is not a matter which they believe can be overcome and therefore the view is that at the present time any further growth into both Latchingdon and North Fambridge should be constrained.
- 6.6 North Fambridge does have a train station which lends itself to providing a sustainable form of transport for those living in the settlement. The settlement does not have a school, doctors' surgery or a shop and whilst developer

contributions could have been sought for the delivery of a school and health facility if deemed necessary by statutory infrastructure providers, it is unlikely that they could have been provided in this new plan period and would most likely have to be phased. On balance with the possible works required to the junction, the impact on the adjacent properties and wildlife site at the junction to the settlement, the questions of constraint over the water infrastructure and the timing of other infrastructure provision, there is now a significant question mark over the settlement's ability to deliver growth in a sustainable and timely way.

- 6.7 Althorne is included in this option because it has a train station. There is a large site put forward in the HELAA in Althorne. It would be inappropriate to discuss the details of this site in this paper as it is subject to a live planning application. However, in terms of its potential as a strategic site allocation, there is some information which can be inferred from the consultation responses on that application. It must be stressed that the factors for consideration in the determination of a planning application are not quite the same as the factors for determining the location of strategic growth.
- 6.8 In terms of education, the quantum of development (550 homes) is not sufficient to generate enough pupil numbers to provide a 1FTE primary school. There is no other land in Althorne suitable to come forward to ensure the numbers are such that this matter could be resolved and a new primary school built in Althorne. The primary school in Latchingdon is unable to expand according to Essex County Council (ECC) and given the water network constraints in Latchingdon, that settlement is unlikely to strategically grow in the future. This means that any opportunities to expand the primary school through additional land opportunities are unlikely to come forward. Therefore, any pupils generated from the development in Althorne would have to travel to the nearest primary schools, which would be Burnham-on-Crouch and St Leonards in Southminster. Whilst St Mary's in Burnham-on-Crouch is having an extension and increase in capacity, it would not be considered a sustainable solution in spatial planning terms to include a site from which children have no ability to walk to their primary school but have to travel by car or bus.
- 6.9 In regard to the water network, Althorne falls within the Maylandsea WRC area. There is some headroom capacity at this WRC for future growth, but with additional growth at Mayland as well it would not be able to accommodate flows from development at this scale without further investment in the works. Sites would require phasing or a reduction in the quantum of growth. Mayland has a number of facilities already whereas Althorne does not. Therefore, the logical place to take up that headroom would be Mayland not Althorne. As there is existing capacity at the present time there is no proposed growth investment scheme identified in Anglian Water's AMP8 (2025 - 2030). Therefore, growth would have to be phased.

- 6.10 With regard to the highway network, ECC have concerns over the impact on the junctions at South Woodham Ferrers concerning the level of growth. This may be able to be overcome but will need modelling. As a strategic location for growth Althorne raises enough concerns in terms of its sustainability, WRC centre issues, educational issues of transporting children to school, to remove it at this time from consideration.
- 6.11 This would leave Maldon, Heybridge, Burnham-on-Crouch and Southminster in the option. Given the increase in housing numbers, this would mean that there would be insufficient land in this option to bring forward the housing requirement.
- 6.12 Considering Option 2 above. This option stated:
- 2. Pursue further testing for Option 5 – A large urban extension bolted onto the existing settlements in the District and adjacent to the District boundary in combination with Option 3 - Growth generally focused on the towns Maldon and Heybridge and Burnham-on-Crouch and all the large villages of the Settlement Pattern.***
- 6.13 This option had a focus on the large sites in the Housing, Economic, Land Availability Assessment (HELAA), these were located in Maldon, Southminster, land adjacent to South Woodham Ferrers (in the parish of Stow Maries) and Althorne. The option would have looked at growth in combination with the other town in the District, Burnham-on-Crouch and all the large villages. In effect this was Option 3 above with two additional large sites incorporated into it – Sites adjacent to South Woodham Ferrers and a site in Althorne.
- 6.14 Since the Council meeting in September 2023, two of those larger sites have had matters emerge on them that now require further discussion as to whether they can progress any further in terms of a strategic allocation at the present time.
- 6.15 **Althorne** – This is discussed above at 6.7.
- 6.16 **South Woodham Ferrers** - In regard to the sites put forward on the land adjacent to South Woodham Ferrers, this site lies in the parish of Stow Maries but is not adjacent to the settlement being some distance from it. South Woodham Ferrers has not been identified in the Chelmsford City Council's Preferred Option Consultation 2025 as a place for new additional growth. At the present time there are already site allocations in the settlement set out in the Chelmsford City Council Adopted Local Plan for 1,220 homes, 1,000 sqm of employment land, 1,900 sqm of food retail space, health facilities etc, with key highway improvements. But these highway improvements are only linked to the allocated growth, not new additional growth and the highway network in and around South Woodham Ferrers is deemed to have limited capacity for new development. Therefore, if the Council were to take this site forward the cumulative impacts would have to be included into any highway modelling.

- 6.17 In regard to the local water recycling centre (WRC), Anglian Water have commented that there is no headroom available to accommodate wastewater flows at South Woodham Ferrers WRC and it has limited scope for permit extensions due to the nearby protected landscape. The Stage 2 Water Cycle Study for the Chelmsford Local Plan identifies that the current consented Dry Weather Flow (DWF) will be exceeded at the WRC based on the proposed growth and current headroom is very limited. Following discussion with Anglian Water, the Water Cycle Study identifies that a specific water quality parameter of concern at South Woodham Ferrers WRC is copper, where the main/ only source is from domestic flows.
- 6.18 The presence of copper means that before an application to increase the DWF permit at South Woodham Ferrers can be made, significant modelling will be required. This will necessitate verification by the Environment Agency before any potential solutions such as the optimisation of treatment process of copper can be identified and considered in terms of feasibility and deliverability, and future investments proposed. The Anglian Water PR24 Business Plan for AMP8 (2025-2030) has not identified any growth investment at South Woodham Ferrers WRC and therefore future investment is unlikely to be identified until AMP9 (2030-2035). Anglian Water are, however, already undertaking the necessary modelling work to understand the issues with regard to the copper infiltration and to see if there are any solutions to the issue.
- 6.19 In terms of sustainability, the site adjacent to South Woodham Ferrers is adjacent to a settlement with services and facilities, it has a secondary school and can accommodate growth in terms of primary education. There are shops and services, and it has a train station. It is a more sustainable solution to place some of the District's growth near the boundary of the District adjacent to a sustainable settlement than to place it within the Dengie, where residents will have to drive to travel out of the District to access South Woodham Ferrers services and facilities anyway. However, any strategic growth located adjacent to the settlement of South Woodham Ferrers would have to overcome the constraints set out above. This site is discussed again under Option 3.
- 6.20 If the Council removes the site in Althorne from Option 5 this then leaves large sites in Maldon and Southminster, which means that Option 5 effectively becomes the same as Option 3, growth in the towns and large villages with the possibility of one additional large site being allocated adjacent to South Woodham Ferrers, therefore by default Option 5 then negates itself for continued work.
- 6.21 We turn to the final option, called 1 in the September 2023 Council Paper. This was as follows:

Pursue further testing for Option 3 – Growth generally focused on the towns Maldon and Heybridge and Burnham-on-Crouch and all the large villages of the Settlement Pattern.

- 6.22 This option can still accommodate all the housing requirement at 575 per annum, but only just. It does not place all the growth in one or two places and therefore does spread the infrastructure burden somewhat and the overall spatial impact of the growth.
- 6.23 It is considered sustainable to place growth in the main towns and large villages because they have the majority of the services and facilities which can be accessed the most easily by foot and cycle. Whilst many state that the bus services in the District are poor, in fact the towns and large villages are serviced by the bus network, though of course there could be improvement to those services.
- 6.24 This option whilst naming Heybridge, only includes Heybridge in terms of its brownfield sites, which could provide approximately 200 dwellings. There are approximately 109 dwellings which spatially look as if they are in Heybridge but actually lie in the parish of Great Totham. There are still flood risk issues in Heybridge, which does call into question more large strategic allocations. The North Heybridge Garden Suburb is still under construction and will be until at least 2031. Any flood alleviation scheme being brought forward is not going to be designed to protect future growth from flood risk but only mitigate against the present allocated growth. Therefore, the Council should carefully consider if it wishes to promote very much more growth in this location.
- 6.25 With regard to Burnham-on-Crouch – there is some capacity for this town to accommodate growth. Like Maldon though, the amount of growth will have to ensure that the secondary education provision can be accommodated. Any growth would need highway modelling to ensure that the impact through South Woodham Ferrers can be accommodated. The WRC would need to have some capacity upgrade and therefore any growth would have to be phased to accommodate this.
- 6.26 In regard to the large villages and their ability to take on additional growth. The large villages are those villages with the most services and facilities as set out in the Rural Facilities Study:
- 6.27 **Southminster** – This village has a good number of services and facilities. The primary school has some capacity. Whilst the plans for the new doctors' surgery are currently stalled, this is due to the way the NHS nationally funds these types of projects, not a lack of a site. There is some capacity at Ormiston Rivers Academy (Burnham-On-Crouch) and William De Ferrers secondary school (South Woodham Ferrers). The WRC has some capacity. Any growth would need highway modelling to ensure that the impact through South Woodham Ferrers can be accommodated. Overall, Southminster does not have any major issues, as yet identified. As with Burnham-on-Crouch any growth would need highway modelling.
- 6.28 **Mayland** – This is in the top four of the large villages, it has a good number of services and facilities. There is a primary school which has capacity and there are two doctors' surgeries. This settlement feeds into both The Plume

(Maldon) and Ormiston Rivers Academy (Burnham-On-Crouch) secondary school provision, so any growth could be shared out between the two schools. Mayland Parish Council are in the final stages of producing a Neighbourhood Plan and have produced their own design code. Therefore, it would be behoved to the Council to support this and any allocations that are brought forward would take the matters set out in that Plan into account in terms of location and conformity to their policies and code (when approved). The Maylandsea WRC has some headroom for growth.

- 6.29 **Latchingdon** – This is in the top four of the large villages, it has a good number of services and facilities. There is a primary school, which has issues with parking and according to the response from ECC education, on planning applications cannot be enlarged. There are issues with this settlement with regard to the WRC which are unlikely to be resolved, as set out above. There is no doctors' surgery. Given this, it is not considered a suitable location for any large strategic allocations at this time. There may be a possibility for some smaller allocations and small windfall development. Any growth would need highway modelling to ensure that the impact through South Woodham Ferrers can be accommodated.
- 6.30 **Tollesbury** – This settlement is quite remote in terms of its connectivity to higher order settlements for services and facilities that go beyond day-to-day needs. It does, however, have a number of services and facilities, which means it's quite self-contained and this could be the reason those services and facilities have not been lost. There is a dichotomy in this regard, because if the Council works towards making Tollesbury more accessible, it could start to affect how residents use the services and facilities in the settlement as they obtain the ability to travel more easily elsewhere. The primary school is linked into Tolleshunt D'Arcy's primary school which is under capacity and some growth could help to increase that primary school by 1 form of entry. This will help to sustain the future of that village school. There is very little headroom at both the Tollesbury and Tolleshunt D'Arcy WRC, so growth may have to be phased. Tollesbury is undertaking work on a Neighbourhood Plan and their consultation has indicated that growth should be located to the west of the village because of access being easier. This is a sensible approach and highway modelling may support that response.
- 6.31 **Tillingham** – This settlement has a medical centre and a primary school. It also has a fire station. The WRC has some headroom for growth. Some growth could help to sustain these services and facilities, especially the fire station. Officers have spoken to the Fire Service and they would not object to more growth in Tillingham as it would assist with drawing in volunteers for the local station.
- 6.32 **Great Totham South** – This settlement has a primary school and other services and facilities. It is in the north of the District so looks to both Tiptree,

Witham and Maldon for its higher order services. Growth in this settlement would assist in maintaining those services and facilities. There is headroom at the WRC.

- 6.34 **Wickham Bishops** – Wickham Bishops does not have either a doctors' surgery or primary school. It does have some retail and is close to Witham services and facilities with its schools, train station and GP surgeries. There is still not enough land come forward to enable sufficient growth to provide either of those two essential items of infrastructure. A small allocation could help sustain the settlement overall though. The settlement feeds into the Great Totham WRC which has headroom.
- 6.35 **Tolleshunt D`Arcy** – This settlement is close to Tiptree and its services and facilities. The village has a primary school, which is very small: the present capacity is 210 with only 114 pupils being registered on the 2024 school roll. Any growth could help its future sustainability by increasing the numbers on the roll. It sits within an educational group comprised of Tollesbury, which is presently also under capacity with a capacity of 210 but a roll of 193. There is headroom at the both the Tollesbury and Tolleshunt D`Arcy WRC.

7.0 SUMMARY OF THE OPTIONS

7.1 In summary, from the Options for growth:

7.2 The Council started out with 7 high level options for growth as set out below.

OPTION 1 – Retain the option in the LDP approved in 2017 – focus growth in the settlements of Maldon/Heybridge and Burnham-on-Crouch.

OPTION 2 – A strong focus on the towns and larger sustainable villages

OPTION 3 – Growth generally focused on the towns Maldon/Heybridge and Burnham-on-Crouch and all the large villages of the Settlement Pattern.

Option 4 – Pepper pot growth throughout the Settlement Pattern (Spread the growth across all the sustainable settlements in the District)

Option 5 - Create a new satellite settlement or large urban extension bolted onto one of the towns, larger villages and/or settlement adjacent to the District boundary.

Option 6 - Focus growth in the north of the District to link into the service and facilities available in Tiptree, Witham and Maldon/Heybridge.

Option 7 – Focus growth along the rail line to Althorne, North Fambridge and Southminster.

7.3 Council on the 14th September 2023 approved examining three options, derived from the seven above.

1. Pursue further testing for Option 3 – Growth generally focused on the towns Maldon and Heybridge and Burnham-on-Crouch and all the large villages of the Settlement Pattern.

2. Pursue further testing for Option 5 – A large urban extension bolted onto the existing settlements in the District and adjacent to the District boundary in combination with Option 3 - Growth generally focused on the towns Maldon and Heybridge and Burnham-on-Crouch and all the large villages of the Settlement Pattern.

3. Pursue further testing for Option 7 - Focus growth along the rail line to Althorne, Burnham-on-Crouch, North Fambridge and Southminster in combination with Option 1 - Retain the option in the LDP approved in 2017 – focus growth in Maldon and Heybridge. (Burnham-on-Crouch is part of Option 7).

7.4 This paper has examined those three options in more detail and also the two options that were discounted on the 14th September 2023. The two discounted options are still recommended to be discounted. They are as follows.

Option 4 – Pepper pot growth throughout the Settlement Pattern (Spread the growth across all the sustainable settlements in the District)

And

Option 6 - Focus growth in the north of the District to link into the service and facilities available in Tiptree, Witham and Maldon/Heybridge.

- 7.5 Out of the three options set out above and following the details set out in this paper there is only one option which it is believed can be taken forward and have less limited constraints for further testing and can deliver the increased housing requirement.

Pursue further testing for growth generally focused on the towns Maldon and Heybridge and Burnham-on-Crouch and all the large villages of the Settlement Pattern.

- 7.6 It is recommended that the site adjacent to South Woodham Ferrers is included in this option given its sustainable location as set out above. However, this should be treated for the present as an additional site, given the potential constraints and risks associated with it. If, after further testing, those constraints can be overcome, then this site could be allocated and the amount of housing it can provide will be removed from the Dengie allocations.

8.0 HOW IS THE GROWTH GOING TO BE DISTRIBUTED

- 8.1 The Council needs a logical, objective way of determining how much growth should go in each settlement.
- 8.2 In order to move on with the work of the LDP Review, the Council has to not only choose an option for growth, but it has to set a broad level of the amount of growth for each settlement in that option. This is so the highway modelling and other work associated with sites can be carried out. Without that information it is not possible to move on with the work needed for the LP Review.
- 8.3 As an example, one way of distributing growth is to do it on % ratio to the number of households in a parish or town. The higher number of households would reflect a larger % of the growth. It is caveated that there has to be sufficient land to accommodate that growth. These figures would be rounded up, which is the normal practice.
- 8.4 Given the level of growth, though this is a starting point, practically, it will not deliver the housing target. Officers have had to look across the sites and work out if, overall, there is even enough land to deliver the amount of growth set out on Page 8 above. The table below shows the results of that exercise.
- 8.5 It is important to start out at this point with more potential housing units than we are actually going to need because some sites will inevitably fall away when more intensive work starts on them, and we may get additional sites come forward. Therefore, the figures in Column A are suggested as a maximum for each relevant settlement plus the site adjacent to South Woodham Ferrers, which as to be modelled and stress tested as with all the other sites.

	Households 2021 Census	% of total		Land available in these settlements	% All Land available	Practical sites Column A	% Practical Sites	Present Existing Commitments - dwellings with PP	%	Total
Maldon	6,691	30%		2908	31%	2426	35%	594	30.5	3020
Heybridge	3,421	15%		309	3%	200	3%	282	4.9	482
Burnham on Crouch	3968	18%		1194	13%	749	11%	654	14.2	1403
Great Totham South	1228	6%		184	2%	350	5%	992	13.6	1342
Latchingdon	569	3%		823	9%	0	0%	218	2.2	218
Mayland	1529	7%		1165	13%	811	12%	7	8.3	818
Southminster	1936	9%		1710	18%	1504	22%	38	15.6	1542
Tolleshunt D`Arcy	455	2%		58	1%	58	1%	3	0.6	61
Tillingham	458	2%		114	1%	114	2%	36	1.5	150
Tollesbury	1191	5%		741	8%	663	10%	45	7.2	708
Wickham Bishops	809	4%		90	1%	90	1%	56	1.5	146
Total	22,255	100%		9296	100%	6965	100% (rounded)	2925	100	9890

Site adjacent to SWF - 1500

District Split % all land available		
North (inc Maldon)	4290	46.15
South	5006	53.85
District Split % Practical sites		
North (inc Maldon)	3787	54.37
South	3178	45.63

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9.0 CONCLUSION

- 9.1 As set out above, and given the details set out in this paper, it is considered that there is only one realistic option for growth for the District – that is Option 3 – growth in the towns and large villages, plus the potential of bringing forward the site located adjacent to South Woodham Ferrers.
- 9.2 Therefore, it is recommended that the Council pursue testing of Option 3 with maximum housing number for each settlement as set out in the table above, including analysis of the site adjacent to South Woodham Ferrers.