

Report title: Brentwood Local Plan – Addendum of Focussed Changes to Pre-Submission Local Plan (Regulation 19), October 2019	
Report to: Cllr Ball, Cabinet Member for Economic Development	
Report author: Dominic Collins, Director Economic Growth and Localities	
Date: 26 November 2019	For: Decision
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County Divisions affected: All Divisions within Brentwood Borough Council and adjoining divisions	

1. Purpose of Report

- 1.1 To approve the proposed Essex County Council (ECC) formal response to the Brentwood Local Plan – Addendum of Focussed Changes to the Pre-Submission Local Plan October 2019 (Regulation 19) and submit by the 26th November 2019 deadline.

2. Recommendations

- 2.1 To agree and send to Brentwood Borough Council (BBC) the response to the Local Plan Addendum consultation as contained in Appendix 1 to this report and endorse the comments as the basis for ECC's written representations to be submitted to the Planning Inspector appointed to deal with the Local Plan examination.
- 2.2. To agree to confirm that ECC will continue to work closely with BBC through the duty to cooperate role, to ensure ECC's representations are addressed. In particular:
 - a. As a result of the increase in dwelling numbers on the Dunton Hills Garden Village (DHGV) site allocation policy, the Local Plan evidence base and supporting text for the policy, should provide details to demonstrate that the reallocation of dwellings to this site is where the need is, and that all other reasonable options for reallocating the dwellings have been fully examined, including making as much use as possible of suitable brownfield sites and underutilised land, and optimising density;
 - b. As a result of the reduction in dwelling numbers for the two site allocation policies in Blackmore and two in Shenfield, the Local Plan evidence base and supporting text for these policies, should provide details to demonstrate that the site allocation makes effective and efficient use of land, and is economically viable and addresses the need for housing in the right location; and
 - c. As a result of the changes in dwelling numbers on the five site allocation the transport evidence base should be updated to fully assess the transport implications.
- 2.3 To agreed to confirm that the reduction in dwelling numbers for the site allocation policy R26: Land at Orchard Piece, Blackmore has overcome ECC's objection to vehicular access, as raised in its response to the Regulation 19 consultation in March 2019.
- 2.4 To reconfirm that the Addendum has not addressed any of ECC's representations (other than set out in paragraph 2.3 above) as submitted at the Regulation 19 stage (March 2019), and ECC's position on these matters remains unchanged. If these matters are not addressed ahead of the Local Plan being submitted and the examination, ECC will not be in a position to support BBC at the examination and will need to object to the Plan on the basis of its Regulation19 representations.

- 2.5 To agree that wherever alignment and agreement can be achieved ECC can enter into a Statement of Common Ground (SoCG) with BBC with the aim of supporting BBC's submitted Plan and its subsequent Examination in Public; and to support and defend BBC at the Local Plan Examination.

3. Summary of issue

The following provides a summary of BBC's Local Plan preparation and consultation to date; the ECC response to those consultations; and then a summary of the focused changes (this consultation). The ECC proposed response to the Plan is outlined in Section 4 of this CMA.

Background – Local Plan – Stages

- 3.1 The new Brentwood Local Plan has been prepared over stages since 2013.
- Preferred Options consultation in 2013;
 - Strategic Growth Options consultation in 2015;
 - Draft Local Plan (Reg 18) consultation in 2016 (CMA [FP/406/02/16](#));
 - Focused consultation in 2018 (Reg 18) on preferred housing, specialist accommodation and employment sites; and updated vision, strategic objectives and spatial strategy (CMA [FP/061/01/18](#)); and
 - Pre-Submission Local Plan (Reg 19) consultation in February - March 2019 (CMA [FP/389/03/19](#))
- 3.2 ECC has fully engaged and supported BBC throughout the plan making process, with a consistent position at each of the above stages. Whilst ECC has been supportive in the plan preparation process, it has 'withheld support' for the strategy and proposals put forward to date, given the level of missing technical evidence and the financial risk this carries for ECC. ECC has consistently highlighted concerns that the Plan had been prepared in advance, and not influenced or supported by, a significant range of evidence base documents (particularly highway modelling and an infrastructure delivery plan (IDP)).
- 3.3 Over the years and particularly the last 12 months, senior officers from ECC and BBC have been meeting to address the clarification and justification for the spatial strategy, strategic housing and employment allocations, alternatives considered, deliverability, viability, highways, and education matters. This evidence should be in place and published alongside the Plan and is needed in order for ECC to determine a clear and sound position and is a requirement of national planning policy.
- 3.4 The ECC position since 2014 (as outlined in a Full Council motion on 14 October 2014 and then reiterated in 2017) is one of supporting borough, city and district Local Plans but ensuring these do not place an unnecessary cost burden on ECC and the public purse by ensuring developers meet their infrastructure cost responsibilities. Without a sound evidence base, (particularly a complete IDP), the impacts of growth and required works and costs for mitigation cannot be determined.
- 3.5 ECC, in its response to the Reg.19 Local Plan consultation (March 2019), stated that support for the Local Plan could only be provided once the following had been completed to the satisfaction of ECC:
- a. An appropriate transport evidence base, to reflect ECC's role as Highway Authority, that clearly illustrates the site specific, local and cumulative impact on the local and

- strategic transport network; and identifies any infrastructure and/or mitigation measures which would be required, together with costs and phasing,
- b. An up to date IDP that includes infrastructure costs, phasing, delivery and viability (particularly where ECC is identified as a project lead and funding source), and
 - c. Clear references to the evidence base within the Plan to support the spatial strategy.
- 3.6 Since March 2019 and following the end of the Reg 19 consultation period ECC has continued to work with, and provide support to BBC to ensure that ECC's concerns are addressed, and that the proposals in the Local Plan and IDP do not place a financial burden on ECC as a primary infrastructure provider.
- 3.7 Regular focused meetings have taken place in respect of transportation and highways matters and considerable progress has been made. It should be noted that BBC commissioned their own highway consultants, to prepare the transport modelling, which has required ECC to check outputs to confirm the highway authority assurance and agreement. Significant work is still required to ensure the transport assessment is robust, and the mitigation measures are identified and accounted for. The most recent Local Plan transport meeting was 29 July 2019, where a full, technical and detailed response was provided to BBC and their transport consultants.
- 3.8 BBC currently advise that work is continuing to resolve outstanding transport matters and expect to issue a draft final version of the Local Plan transport assessment by the end of the year. BBC also indicate that it will produce a table to set out what is agreed and changes made, together with what is not agreed and why.
- 3.9 In respect of the IDP, focused discussions have also taken place with the relevant ECC infrastructure providers and BBC officers. With the exception of transportation and highways infrastructure, ECC are now satisfied that the appropriate infrastructure for the Local Plan growth could be delivered and BBC are clear on the needs and costs for the IDP.
- 3.10 It must be underlined that ECC has invested significant officer resources and time to assist BBC shape and inform its Regulation 19 Plan and the supporting evidence. Whilst focus has been centred on addressing the key matters relating to transportation and the IDP, it should be noted that ECC has also raised a significant number of other matters both in its formal consultation responses to the Reg 18 consultation in 2018 and Reg 19 consultation in March 2019, as well as the time between, and following, the two consultations. BBC advise that these will be provided in a Statement of Common Ground, however ECC is still to see a clear schedule of how BBC intends to address all of these matters.
- 3.11 In September 2019, BBC's Policy, Resources and Economic Development Committee approved an Addendum of Focused Changes to the Pre-Submission (Regulation 19) Local Plan for consultation (the subject of this CMA and detail provided in paragraphs 3.13 onwards). This consultation runs from 15 October to 26 November 2019. Following this, BBC intends to submit the Plan and representations received (from both the current consultation and the Pre-Submission consultation from Feb-March 2019), to Government for examination, together with the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA), and other supporting evidence. BBC indicate that it is working towards submission by late January 2020.

Government Risk of Local Plan Intervention in Brentwood

- 3.12 The Secretary of State for Housing, Communities and Local Government wrote to BBC in November 2017, advising that BBC was being considered for Local Plan intervention by Government as it had not adopted a 2004 Act Local Plan, and there were concerns about the lack of progress made on plan-making. BBC responded to the Minister setting out its circumstances and progress to date.
- 3.13 In March 2018 the Government responded and advised BBC that whilst they were not subject to intervention at that stage, they needed to continue to meet their published Local Plan timetable, and would be very closely monitored. BBC continues to inform Government of its progress.

Addendum of Focused changes to Pre-Submission Local Plan (Reg.19) – Content and Structure (this consultation)

- 3.14 This is a ‘focused consultation’ which only sets out changes to dwelling numbers on five of the Pre-submission Local Plan (February 2019) residential site allocations. The amendments do not alter the Plan’s overall housing numbers or Spatial Strategy, they merely redistribute the housing growth. The changes are set out in the table below.

Focused Change	Policy Number	Site	Previous dwelling numbers	Proposed dwelling numbers	Difference
1	Policy R01 (I)	DHGV	2,700	2,770	+70
2	Policy R18	Land off Crescent Drive, Shenfield	55	35	-20
3	Policy R19	Land at Priests Lane, Shenfield	75	45	-30
4	Policy R25	Land North of Woollard Way, Blackmore	40	30	-10
5	Policy R26	Land North of Orchard Piece, Blackmore	30	20	-10

- 3.15 The Addendum justifies the reduction in the number of dwellings on the sites in Shenfield and Blackmore on the basis of considerable representations received at the Reg 19 stage in March 2019 raising key concerns in relation to inconsistency with the character of the local area in regard to density, implications of increased traffic and associated safety, highway access, impact on local services and infrastructure, development on urban open space, development in the Green Belt, environmental and habitat impacts, and flooding. The Addendum also recognises that the increased number of dwellings on the DHGV site will require a faster rate of delivery in order to achieve the housing numbers within the Plan period. The comments made by ECC in relation to the various sites is not referred to.

- 3.16 There are no other changes proposed to these five policies. Furthermore, the consultation does not include changes to any other parts of the Pre-Submission Local Plan (February 2019) consulted upon earlier this year. It is acknowledged that the Local Plan Sustainability Appraisal, Habitat Regulation Assessments, Health Impact Assessment and Equalities Impact Assessment have been reviewed, however the consultation is not accompanied by any new or updated evidence reports, such as the transport assessment or the IDP. The Addendum does not address any of ECC's representations (other than that identified in paragraph 2.3 of this CMA) that were submitted at that the last consultation stage (summarised in paragraph 3.5 above).
- 3.17 BBC are seeking representations on the Addendum only where they arise from new information contained in the Addendum. BBC will not accept representations that are not related to this new information, or that repeat representations already submitted to the previous Pre-Submission Reg.19 consultation in March 2019. BBC consider any representations made in March 2019 still remain relevant and will include these when it submits its Local Plan for examination (by late January 2020).

Policy objectives

- 3.18 ECC aims to ensure that local policies and related strategies provide the greatest benefit to deliver a buoyant economy for the existing and future population that lives, works, visits and invests in Essex. This includes a balance of land uses to create great places for people and businesses; and that the developer funding for the required infrastructure is clear and explicit. As a result, ECC is keen to understand, inform, support and help refine the formulation of the development strategy and policies delivered by LPAs within and adjoining Essex, including the preparation of the South Essex Joint Strategic Plan (JSP). Involvement is necessary and beneficial because of ECC's roles as:
- a. a key partner of the Association of South Essex Local Authorities (ASELA) and Opportunity South Essex Partnership (OSE), promoting economic development, regeneration, infrastructure delivery and new development throughout the County;
 - b. major provider and commissioner of a wide range of local government services throughout the county (and where potential cross boundary impacts need to be considered);
 - c. the highway and transport authority, including responsibility for the delivery of the Essex Local Transport Plan; Local Education Authority including Early Years and Childcare (EYCC), Special Education Needs and Disabilities, and Post 16 education; Minerals and Waste Planning Authority; Lead Local Flood Authority; lead advisors on public health; and adult social care in relation to the securing the right housing mix which takes account of the housing needs of older people and adults with disabilities, and;
 - d. an infrastructure funding partner, that seeks to ensure that the development allocations proposed are realistic and do not place an unnecessary (or unacceptable) cost burden on the public purse, and specifically ECC's Capital Programme.
- 3.19 The ECC response seeks to ensure the following ECC policy objectives are reflected in BBC's Plan:
- [Essex Organisation Strategy, 2017 – 2021](#)
 - [Economic Plan for Essex](#)
 - [Essex Transport Strategy, the Local Transport Plan for Essex \(June 2011\)](#)
 - [A127 Corridor for Growth - An Economic Plan 2014 \(A127 Route Management Strategy\)](#)

- [A127 Air Quality Management Plan - \(Strategic Outline Case\) March 2018](#)
- [ECC Sustainable Modes of Travel Strategy \(January 2019\)](#)
- [Essex Cycling Strategy November 2016](#)
- [10 Year Plan – Meeting the demand for school places in Essex 2019-2028](#)
- [ECC Developers' Guide to Infrastructure Contributions \(2016\)](#)
- [Joint Municipal Waste Management Strategy for Essex \(2007 - 2032\)](#)
- [Essex Minerals Local Plan 2014](#)
- [Essex and Southend-on-Sea Waste Local Plan 2017](#)
- [ECC Sustainable Urban Drainage Design Guide 2016](#)
- [Essex Design Guide 2018](#)

4. Options

- 4.1 The full proposed ECC response to the Addendum consultation is set out in Appendix 1 to this report. It is recommended that these comments form the basis for ECC's written representations to be submitted to the Planning Inspector appointed to conduct the independent Local Plan Examination. These will be in addition to ECC's representations to the Reg.19 consultation in March 2019. The Inspector's role is to assess whether the Plan has been prepared in accordance with the Duty to Co-operate, legal and procedural requirements, and whether it is sound.
- 4.2 Therefore, the formal ECC response to the Addendum only includes those areas where an amendment is required to update information, clarify intent or ensure soundness in accordance with the National Planning Policy Framework (NPPF). As previously indicated, the Addendum has not addressed any of ECC's representations previously submitted at the Regulation 19 stage (March 2019) (other than the one identified in paragraph 2.3 of this CMA). The ECC response will not therefore repeat these representations, but will make it clear to BBC that these have not been addressed and ECC's position on these matters remains unchanged.
- 4.3 Consideration is necessary by ECC on the option of working with BBC further to explore and discuss ECC's representations wherever possible and to develop a SoCG where appropriate ahead of the examination and ideally before submission in order to resolve any outstanding objections. If these matters are not addressed ahead of the Local Plan being submitted and the examination, ECC will not be in a position to support BBC at the examination and will need to object to the Plan on the basis of its Regulation 19 representations.
- 4.4 In summary, in addition to the outstanding matters raised in March 2019 (set out in section 3 of this CMA), there remain gaps in the evidence base and support for the Plan can only be provided once the following has been completed to the satisfaction of ECC:
 - a. the Local Plan evidence base and supporting text for the DHGV policy, provides the necessary details to demonstrate that the reallocation of dwellings to this site is where the need is, and that all other reasonable options for reallocating the dwellings have been fully examined, including making as much use as possible of suitable brownfield sites and underutilised land, and optimising;
 - b. the Local Plan evidence base and supporting text for the two site allocation policies in Blackmore and the two in Shenfield, provides the necessary details to demonstrate that the site allocation makes effective and efficient use of land, and is economically viable and addresses the need for housing in the right location; and
 - c. the Local Plan transport evidence base fully assesses the transport implications of the changes in dwelling numbers on the five site allocations.

Duty to co-operate

- 4.5 The Addendum is not considered to raise any issues relating to Duty to Co-operate. However, there remains outstanding matters raised by ECC at the Regulation 19 consultation in March 2019. It is recommended that ECC continues to work collaboratively with BBC to progress the Plan, its evidence base and Infrastructure Delivery Plan (IDP) to ensure that the outstanding matters are addressed ahead of submission and examination both in respect of the Local Plan and IDP.
- 4.6 It is recommended that ECC continues to be an active member of working groups, and the member Delivery Board and undertake collaborative work with BBC to progress the Plan to examination, and continue to undertake regular joint meetings including but not limited to:
- Highways and transportation modelling and strategic projects;
 - A127 SoCG between the London Borough of Havering, the South Essex Authorities, ECC, Highways England (HE) and Transport for London, in respect of the strategic importance of the A127 and to lobby for improvements;
 - Engagement with HE in respect of the Lower Thames Crossing and the A12;
 - South Essex Transport Board and the A127 Task Force;
 - A127 air quality;
 - Lobbying Government for strategic highway and sustainable travel improvements; and
 - Preparing joint evidence, guidance and policy documents lead by the Essex Planning Officers' Association (EPOA).
- 4.7 Furthermore, BBC and ECC continue to be active parties within ASELA working collaboratively with South Essex partner authorities to provide place leadership for South Essex 2050 and the South Essex Joint Strategic Plan (JSP). This includes a SoCG between all South Essex authorities, including ECC.

Legal and procedural requirements including "soundness"

- 4.8 Paragraph 35 of the NPPF states a Local Planning Authority (LPA) should submit a plan for examination which it considers is 'sound' – namely that it is positively prepared, justified, effective and consistent with national policy. Compliance is examined below:
- a. Positively prepared** – The Local Plan should be providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- 4.9 The Addendum does not alter the strategy that seeks to meet Objectively Assessed Housing Need (based on the standard methodology and providing for a 20% uplift) in full over the Plan period within its administrative boundaries.
- 4.10 However, it is recommended that evidence needs to be demonstrated that the reallocation of the dwellings from the sites in Blackmore and Shenfield to DHGV is accommodating the housing requirement where it is needed, and that all other reasonable options for reallocating the dwellings have been fully examined, including making as much use as possible of suitable brownfield sites and underutilised land, and optimising density, in accordance with the NPPF.

- 4.11 It is also recommended that the transport evidence base is updated to fully assess the transport implications of the change in dwelling numbers on the five site allocations.
- 4.12 In respect of education, ECC previously identified (March 2019) specific infrastructure requirements for EYCC, and primary and secondary schools arising from the planned growth. The Addendum does not result in any detailed changes being required to these.
- 4.13 The second requirement in NPPF paragraph 35 is:
- b. Justified** – The Local Plan should be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

ECC Response

- 4.14 In line with paragraph 31 of the NPPF, a Local Plan needs to be underpinned by relevant and up to date evidence. As stated earlier in this CMA, as a result of the increase in dwelling numbers on the DHGV site allocation policy, it is recommended that the Local Plan evidence base and supporting text for the policy, should provide details to demonstrate that the reallocation of dwellings to this site is where the need is, and that all other reasonable options for reallocating the dwellings have been fully examined, including making as much use as possible of suitable brownfield sites and underutilised land, and optimising density.
- 4.15 It is also recommended that the transport evidence base is updated to fully assess the transport implications of the change in dwelling numbers on the five site allocations.
- 4.16 Furthermore, as a result of the reduction in dwelling numbers for the two site allocation policies in Blackmore and two in Shenfield, it is recommended that the Local Plan evidence base and supporting text for these policies, should provide details to demonstrate that the site allocation makes effective and efficient use of land, and is economically viable, in accordance with the NPPF.
- 4.17 It is also recommended that ECC reiterates its position in respect of the outstanding matters in relation to the evidence base and IDP as set out in paragraph 3.5 of this CMA.
- 4.18 The third requirement in NPPF paragraph 35 is:
- c. Effective.** The Local Plan should be deliverable over the Plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the SoCG.

ECC response

- 4.19 It is recommended that ECC acknowledges and supports the joint working that has taken place. These include ECC as a signatory to the ASELA SoCG covering the JSP; a A127 Strategic Transport Issues MoU (between London Borough of Havering, ECC, South Essex authorities and HE, September 2017); and an EPOA MoU regarding unmet housing need. There is ongoing partnership work including the preparation of strategic evidence for strategies and Local Plans, either through ASELA, EPOA, and other bodies such as the South Essex Health and Wellbeing Board or OSE, and the A127 Task Force. The Addendum has no implications in this respect.

4.20 ECC will continue to be an active and equal partner of a number of member and officer working groups regarding ASELA and the respective workstreams including Planning, Infrastructure, and Productivity, as part of the DtC by South Essex councils and ECC to bring forward and progress the delivery of the JSP.

4.21 The fourth requirement in NPPF paragraph 35 is:

- d. **Consistent with national policy.** The Local Plan should be enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (2018).

ECC response

4.22 ECC has worked to ensure through its representations to date and ongoing engagement with BBC throughout plan preparation, that our areas of responsibility are addressed consistent with national policy to enable sustainable development. ECC has identified issues arising through the Addendum relating to consistency with national (planning) policy. These are set out in Appendix 1.

4.23 It is also recommended that ECC reiterate that its representations made to the Pre-Submission Local Plan Regulation 19 consultation in March 2019 are still outstanding and ECC's position remains unchanged (other than the one identified in paragraph 2.3 of this CMA) as a result of this Addendum consultation.

4.24 ECC will continue to work cooperatively with BBC to ensure issues can be positively addressed prior to BBC submitting the Plan for examination. A SoCG may need to be prepared at that time to address any outstanding issues. The approach will be confirmed closer to the time and is one that has been successful with other local authorities as they prepare submission local plans and examination hearings.

5. The following documents have been used to inform the ECC response (web-links provided).

5.1 The public consultation documents can be viewed by the following link to the BBC website [here](#) and include:

- [Addendum of Focused Changes to the Pre-Submission Local Plan - October 2019](#)
- [Sustainability Appraisal - October 2019](#)
- [Sustainability Appraisal \(SA\) – Non-technical Summary – October 2019](#)
- [Sustainability Appraisal \(SA\) – Report Addendum – October 2019](#)
- [Pre-Submission Local Plan - Habitat Regulations Assessment – October 2019](#)
- [Pre-Submission Local Plan – Health Impact Assessment – October 2019](#)
- [Pre-Submission Local Plan – Equalities Impact Assessment – October 2019 Update](#)

5.2 The [Pre-Submission Local Plan – February 2019](#) can be viewed via this [link](#), and additional supporting Local Plan [evidence base documents](#) can be viewed via this [link](#) and include the IDP (January 2019), Transport Assessment (October 2018), and Viability Assessment (October 2018).

6.1 Financial implications:

6.1.1 There are no direct financial implications in respect of ECC's response to the consultation. The involvement of ECC in the Local Plan examination will involve staff resource implications, however, it is anticipated that this will be managed within existing budgets. However, there will be implications for ECC's financial position to assist the implementation of the Local Plan once adopted. The Local Plan triggers infrastructure delivery when sites are brought forward for development and include the need for external funding for strategic transport infrastructure. Site specific policies cover ECC requirements to make the development acceptable in planning terms in relation to education and sustainable drainage provision. The transport evidence base work is on-going and, as a result, the requirements and cost implications for such matters are still to be clearly identified and agreed between BBC and ECC. At this late stage of plan preparation this carries a risk for ECC.

6.1.2 An IDP has been prepared to support Local Plan delivery, however this needs to be updated prior to submission. In its current form there are significant infrastructure cost implications and unanswered questions, particularly in relation to transportation, for ECC to be comfortable as a primary infrastructure provider. BBC therefore needs to engage with ECC to prepare its final IDP to support its Plan. The Addendum does not address these outstanding matters, therefore ECC's position at this stage is unchanged.

6.2 Legal implications:

6.2.1 The duty to co-operate is contained in the Planning and Compulsory Purchase Act 2004, as amended by the Localism Act 2011. It requires Local Planning Authorities to engage constructively, actively and on an on-going basis to ensure that the preparation of the Local Plan has regard to key strategic matters addressing social, environmental and economic issues which can only be addressed by effectively working with other authorities beyond their own administrative boundaries. This is set out in guidance issued in March 2019.

6.2.3 Although a Local Plan may be found unsound at Examination if the duty to co-operate has not been properly undertaken and the implications of this require careful consideration, the duty is not a duty to reach agreement. ECC is continuing to carry out its functions properly in submitting comments on specific issues of concern or objection, where necessary, at this and previous stages and in identifying a potential need to maintain those concerns to the Examination stage if not resolved.

7. Equality and Diversity implications

7.1 The Public Sector Equality Duty applies to ECC when it makes decisions. The duty requires us to have regard to the need to:

- a. Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act. In summary, the Act makes discrimination etc on the grounds of a protected characteristic unlawful
- b. Advance equality of opportunity between people who share a protected characteristic and those who do not
- c. Foster good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.

7.2 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, gender, and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).

7.3 An Equality Impact Assessment (October 2018) was undertaken by BBC to inform the new Local Plan and was reviewed in October 2019 to inform the Addendum. It is relied on by ECC. The review considered that the impact of the proposed changes was not significant. The Local Plan has no negative impacts and there is a low risk of negative impact on the affected groups. Impacts will continue to be monitored and if particular issues are identified, appropriate action will be taken. It is considered that all opportunities will be taken to advance equality through the Local Plan.

8. List of appendices

8.1 Appendix 1 – full proposed ECC response to the Brentwood Addendum of Focused Changes to the Pre-Submission Local Plan, October 2019.

- **List of Background papers**

None

I approve the above recommendations set out above for the reasons set out in the report.	26 November 2019
Councillor Cllr Ball, Cabinet Member for Economic Development	

In consultation with:

Role	Date
Executive Director for Finance and Technology Services (S151 Officer)	12 November 2019 (S151 Not Required)
Monitoring Officer Jacqueline Millward, on behalf of Paul Turner, Director Legal and Assurance	06 November 2019
Executive Director, Economy, Localities and Public Health Graham Thomas Head of Planning, on behalf of Dominic Collins, Director of Economic Growth and Localities	08 November 2019