

Forward Plan reference number: N/A

Report title: ECC response to the Draft Uttlesford Local Plan 2021 – 2041 (Regulation 18) Consultation, November 2023	
Report to: Cllr Lee Scott, Cabinet Member for Planning a Growing Economy	
Report author: Steve Evison - Director for Sustainable Growth	
Date: 14 December 2023	For: Decision
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County Divisions affected: All Divisions within Uttlesford District and adjoining divisions	

1. Purpose of Report

- 1.1 To approve the proposed Essex County Council (ECC) response to the Draft Uttlesford Local Plan (DULP) 2021 – 2041 (Regulation 18) Consultation due to be submitted for the 18 December 2023 deadline.

2. Everyone's Essex

- 2.1 Everyone's Essex, ECC's organisation strategy, sets out four strategic areas and 20 commitments. One strategic aim seeks a strong, inclusive and sustainable economy. This strategic aim includes a commitment to deliver and maintain high quality infrastructure to support a growing economy and the delivery of new homes and communities. Achieving this requires us to ensure that the development, planning and infrastructure delivery across the administrative county, can be aligned and support the Local Plans that are being prepared across the county, at its borders and beyond. This is to ensure that the planned growth includes provision for the delivery of ECC's infrastructure and services commensurate with the growth being planned, and to support existing and future residents and businesses.
- 2.2 The ECC response to the DULP takes into account the need to plan for sustainable and climate resilient forms of development and to ensure the infrastructure requirements sought in the DULP are adequately provided for. Such requirements need to support the spatial patterns of growth and cannot place an unaffordable cost burden on the public purse or require early intervention to retrofit or "make good". Our comments are written with a view to be helpful in shaping the next iteration of the Uttlesford Local Plan which is scheduled for consultation in Summer 2024.
- 2.3 The DULP is at an early stage of Plan preparation, which is the first formal stage with ECC identifying the areas and issues to be addressed. It will be important ECC continues to work closely with Uttlesford District Council (UDC) through all stages of Plan-making. At this early stage we have only undertaken certain individual or cumulative assessments of growth on ECC services that respond to the information provided to us by UDC. However, further engagement and evidence from UDC will be required in relation to transportation, education, minerals and waste, employment and the economic needs of the district, as UDC prepares its next and final version of its new Local Plan. ECC will also contribute to the evidence in respect of skills,

Adult Social Care housing needs of different cohorts, Public Health and climate change, so that the DULP can deliver a strong economy, safer, greener and healthier communities.

- 2.4 The proposed ECC comments made, strongly support our commitments to climate action in Everyone's Essex and emphasise the promotion of sustainable growth and development with a commitment to meeting the challenges of a net zero carbon future. ECC is an advocate for climate change and several of the Draft Plan's policies are aligned with the recommendations of the independent Essex Climate Action Commission's (ECAC) report [Net-Zero: Making Essex Carbon Neutral \(July 2021\)](#) and the ECC Response to that report. ECC's Climate Change officers have worked closely with UDC on the relevant policy drafting for the DULP to secure the highest standards required to address climate change and net carbon zero housing standards which have been taken into account within the DULP policies.
- 2.5 The summary of the ECC proposed response to this consultation is outlined in paragraphs 6.4 – 6.48 and the key messages in paragraph 4.15.

3. Recommendations

- 3.1 To agree and send the ECC corporate response to the DULP consultation as set out in Appendix 1 – highlighting the ECC response to the consultation.
- 3.2. To agree ECC's officers continue to work closely with UDC through the Duty to Cooperate (Duty) process (or any replacement process) to refine and progress preparation of the emerging Uttlesford Local Plan and the supporting evidence required, to continue to work collaboratively on strategic and cross boundary issues and to ensure ECC is able to assist in the viable delivery of key services and the provision of infrastructure arising from planned growth within Uttlesford District.

4. Background and Proposal

Context

- 4.1 UDC is preparing a new local plan and its first draft plan is now subject to public consultation. The current Uttlesford Local Plan was adopted in 2005, is demonstrably out-of-date and it is one of the oldest adopted plans in England.
- 4.2 In the absence of an up-to-date local plan and a suite of locally determined policies, UDC has had a lot less control over development coming forward and has been subject to and reliant on the 'Presumption in favour of sustainable development' (NPPF, paragraph 11). This has been exacerbated as UDC has been unable to demonstrate a five-year supply of deliverable housing sites. Accordingly, Uttlesford has been subject to high levels of speculative and relatively unplanned development (much on appeal) resulting in less consideration for infrastructure planning particularly on a cumulative impact and strategic scale. This has impacted ECC infrastructure and services - notably school funding and provision; and mitigating impacts on the highway network. ECC acknowledges that these multiple small piecemeal developments have made modest contribution to infrastructure, inadequate for the collective level of growth and making cumulative impacts from development harder to mitigate without the clear leadership a planning framework provides.

- 4.3 A new local plan is therefore required to reflect updated national policies, not least those contained in the National Planning Policy Framework (NPPF), national policy and guidance, and to incorporate best practice on a range of issues and policy matters. An up-to-date Local Plan will enable UDC to ensure development is located to maximise sustainable development and ensure the provision and funding of required infrastructure. This will enable UDC to influence the quality of development coming forward particularly in addressing climate change and net zero requirements.

UDCs Previously Submitted Local Plans

- 4.4 Previously two proposed draft Uttlesford Local Plans were submitted to the Secretary of State in 2014 and 2019, but neither progressed to adoption. In both cases, the Inspectors considered the Plans were not capable of adoption, even with consideration for Modifications.
- 4.5 UDC submitted their first new draft local plan for examination in 2014 following years of preparation. This plan failed as the housing evidence and housing numbers were not deemed sound. The Inspector also questioned the site selection process, growth at Elsenham and the impact on the rural road network.
- 4.6 A further draft Plan was prepared which was tested at examination in 2019. This also failed. The Inspectors had significant concerns with the soundness of the plan, in particular insufficient evidence to demonstrate that the three proposed Garden Communities and the overall spatial strategy was 'justified'. The Inspectors were unable to conclude that fundamental aspects of the Local Plan were sound and viable. It was recommended that the plan be withdrawn. The Inspectors did helpfully provide 'next steps' guidance for UDC to assist with how this should be progressed.
- 4.7 Following the withdrawal of that draft local plan in early 2020, UDC sought a Local Plan Peer Review. The Peer Review was undertaken by the East of England Local Government Association in 2020 and highlighted the serious implications or risks for not having an up-to-date local plan in place. The overarching recommendation was to continue the preparation of a local plan, the process should be open and transparent with residents and UDC should update its evidence base and focus on:
- a reassessment of housing and employment assumptions;
 - a reassessment of infrastructure deficits and requirements; and
 - development for a net zero carbon future.

UDC Local Plan timetable

- 4.8 The Government is implementing a new approach to preparing local plans and have made clear that councils currently preparing plans should continue using the current system, as is the case with UDC. Transitional arrangements have been set out that ensure that any local plan submitted by June 2025 will be examined under the current planning system. Under these transitional arrangements, adoption will need to take place by 31 December 2026.
- 4.9 The UDC timetable is as follows:
- | | |
|--|----------------|
| • Consultation on Draft Local Plan (Regulation 18) | Nov/Dec 2023 |
| • Publication of Submission Plan (Regulation 19) | June/July 2024 |
| • Submission to Secretary of State | Dec 2024 |
| • Examination | 2025 |
| • Adoption | Mid 2026. |

- 4.10 This timetable is extremely tight, particularly the time given to the preparation of the Submission Plan. This emphasises the need for ECC to provide UDC with detailed comments on the DULP to ensure changes are fully considered and can be reflected in Submission Plan, where consultation is expected in Summer 2024. UDC has indicated that if the DULP is not progressed quickly enough, and it is necessary to wait for the new approach to plan making, it is unlikely a local plan could be adopted before 2028 at the earliest.

Current Consultation (The DULP)

- 4.11 UDC has published a full draft Local Plan at this Regulation 18 stage. Accordingly, ECC needs to provide a much more detailed response at this early stage given the detail provided. ECC's response outlines matters we support, object and where further work must be undertaken. Officers will continue to work cooperatively with UDC to ensure a sound spatial strategy is developed by UDC as part of their final Submission Plan (regulation 19) intended to be published in the summer 2024.
- 4.12 UDC state that a new Local Plan for Uttlesford must be progressed as efficiently and effectively as possible and they envisage the Local Plan will achieve the following objectives -
- found 'sound' at examination reducing risks, as far as possible, associated with its preparation;
 - consider the findings of the Inspectors from the previously submitted Uttlesford Local Plans;
 - support the delivery of sustainable development, maximising opportunities for the use of sustainable modes of travel and providing good access to jobs, services and facilities;
 - maximise opportunities for new infrastructure to benefit existing communities, in addition to new residents, in an attempt to start addressing the infrastructure deficit; and
 - comprehensive suite of policies to provide high-quality development, addressing climate change and supporting biodiversity enhancement.
- 4.13 The DULP is summarised below as relevant to ECC.
- 4.14 Housing: The DULP makes provision for at least 14,377 dwellings, to be delivered throughout the plan period (2021-41). This is consistent with the objectively assessed housing need for the district up to 2041, as outlined in the UDC Housing Need Assessment (2023). This number exceeds the housing requirement (13,680 dwellings) to provide flexibility and contingency. 5,722 dwellings are known residential commitments with existing planning permissions (known since April 2023). This leaves 5,076 dwellings to be allocated in the DULP at strategic allocations, and a further 1,000 at non-strategic locations (Larger Villages) and the remaining through windfall.
- 4.15 Growth Locations:
- North - the dominant proposed locations for future residential growth are Saffron Walden and Newport.
 - South - strategic allocations for proposed future growth are Great Dunmow, Stansted Mountfitchet and Takeley.
 - Rural areas - the strategic allocation for growth is Thaxted.

4.16 Employment:

- Over the DULP period 2021-2041 the land requirement for future employment is –
 - 27.7ha for Office and R&D; and
 - 52.2ha for industrial development.
- To meet this requirement a further, 10ha is needed for office development and 25-30ha for industrial development beyond known completions and commitments (figures correct from 11th September 2023).
- A total of 54 ha of land is identified for future development at Chesterford Research Park, Great Dunmow/Takeley, Saffron Walden and Gaunts End.

4.17 The DULP includes 71 Core Policies (strategic policies) and 9 Development Policies (non-strategic policies). These fall into three main categories relating to the Spatial Strategy, the Area Strategies, and thematic chapters that relate to Climate Change, Environment and Transport; for Economy and Retail; and for Building Healthy and Sustainable Communities.

4.18 The core policies set out in the Spatial Strategy section are listed below and provide the overarching context for the plan as a whole:

- Core Policy 1: Addressing Climate Change – sets out criteria for development to ensure it responds to the challenge of climate change appropriately.
- Core Policy 2: Meeting Our Housing Needs – specifies the scale and location of new housing, ensuring development is built in the most appropriate locations.
- Core Policy 3: Settlement Hierarchy – classifies the settlements in Uttlesford according to their role and service function.
- Core Policy 4: Meeting Business and Employment Needs – specifies the scale and location of opportunities for economic growth to ensure that sufficient new jobs are provided across Uttlesford in appropriate locations.
- Core Policy 5: Providing Supporting Infrastructure and Services – ensures that new services and facilities are delivered alongside new housing and employment.

4.19 The Area Strategy chapters include policies relating to any development proposals in specified areas, including the detailed requirements for the proposed allocations (with further information provided within the Site Development Templates which form part of the appendices). It aims to ensure the allocations provide for all the infrastructure and other considerations required to support development. This chapter also includes policies relating to highways, green and blue infrastructure, heritage and relevant environmental considerations.

4.20 The final area of policy inclusion within the plan is the three thematic chapters covering 50 policies related to Climate Change, Environment and Transport; Economy and Retail; and Building Healthy and Sustainable Communities. Of particular note are the climate change policies designed to ensure that new development will achieve the highest possible standard of carbon reduction. These policies are based on best practice promoted and prepared by ECC in response to the Essex Climate Action Commission report recommendations to assist Local Planning Authorities across Essex to develop effective and deliverable policies, namely

- Core Policy 22: Net Zero Operational Carbon Development
- Core Policy 23: Overheating
- Core Policy 24: Embodied Carbon, and

Core Policy 25: Renewable Energy Infrastructure.

- 4.21 The consultation is supported by a [Sustainability Appraisal](#); and Strategic Environmental Assessment (dated October 2023), an Equality Impact Assessment forms part of the Sustainability Appraisal, and a [Habitats Regulations Assessment](#). The findings from the SA have assisted UDC in determining their preferred spatial strategy. UDC has also published an evidence base to support the DULP relating to housing; employment; retail; climate change; environmental protection; water management; transport; infrastructure; and landscape and heritage. Subject specific topic papers have also been published on matters relating to housing site selection; employment site selection; transport evidence; and the Duty.

Summary of ECC response to the DULP

- 4.22 The NPPF (paragraph 20) requires Local Plans to include strategic policies, to set out the overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:
- housing (including affordable housing), employment, retail, leisure and other commercial development;
 - infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal management; and the provision of minerals and energy (including heat);
 - community facilities (such as health, education and cultural infrastructure); and
 - conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaption.
- 4.23 This consultation is the first opportunity for ECC to consider the spatial strategy and policies proposed by UDC, as outlined in paragraphs 4.17 – 4.20 of this CMA. While at the early stages of plan preparation (where one would expect options to be presented) UDC has put forward a full draft plan, with a clear spatial strategy, detailed site allocations and draft policies. The summary of the ECC proposed response to the DULP is outlined in Section 6 of this CMA and the key messages are outlined below.

Key messages in the ECC response to this consultation

- Support for UDC preparing a new Local Plan.
- Support UDC in planning to fully meet its own housing needs requirement.
- Support the inclusion of the strong emphasis on climate change from the outset within the DULP and incorporating the Essex net zero policy approach.
- ECC will contribute to the preparation of the full range of evidence documents to support the DULP (consultation expected summer 2024) including further education scenario testing; further highways and transportation modelling; and input to site assessments with regards to our statutory roles and responsibilities.
- ECC will work collaboratively with UDC on preparing a robust Infrastructure Delivery Plan (IDP) to reflect any updated spatial strategy, site allocations, up to date costings, align provision with development phasing and requirements that will be appropriately reflected in the Plan and relevant policies. At this time, the Draft IDP reflects a spatial strategy that ECC could not support.
- Further discussions are sought on the spatial strategy, certain growth locations and site allocations to ensure the distribution and quantum of growth across the district and its location in key settlements can viably support the required infrastructure. Comments focus on Saffron Waldon, Newport, Stansted

Mountfitchet and Thaxted (objections are made to Thaxted). ECC needs to ensure new development fully supports education provision and does not result in a cost burden to ECC; and maximises opportunities for sustainable and active travel. We understand that UDC will review and update housing commitments and this is likely to influence the location and quantum of development proposed in the Submission Plan.

- The need for the DULP (and transport modelling) to address the impact of the appeal decision at East of Highwood Quarry Great Dunmow (1,200 dwellings), which is a significant change to both the quantum and the distribution of residential growth in the district.
- ECC would also like to further understand the implications of the 1,000 homes proposed on non-strategic sites that are yet to be identified by Parish Councils in Neighbourhood Plans in order to ensure greater certainty on specific locations within the identified Larger Villages, infrastructure provision and funding.
- ECC does not fully support, and in some cases makes objections to the DULP in relation to education.
 - ECC provided UDC with a detailed scenario test of their spatial strategy to determine school requirements, but the DULP strategy is different to what was tested and therefore school requirements in the DULP do not fully reflect the information provided.
 - The quantum of development in many locations is not sufficient to fully support a new primary school. In other cases existing primary schools do not have the land to expand. Although ECC acknowledges the DULP allocates land for school purposes (2.1 ha), in many cases the quantum of development will only deliver one form of entry need rather than the required two forms of entry primary school that is economical and sustainable to deliver, thereby leaving a one form entry cost being placed on the public purse.
 - A suitable and deliverable solution to the provision of secondary education in Saffron Waldon will need to be found. At this stage there is no agreement or support for a “new Sixth Form Centre”. The proposal as framed is not deliverable and agreement on this matter must be sought before it can be included in the Submission Plan otherwise it must be deleted
 - Early Years and Childcare (EYCC) and Special Educational Need (SEN) requirements have not been addressed.
 - Post 16 and Skills requirements have not been addressed.
- Acknowledge our involvement in the transport work that has taken place to date. Further work and ongoing engagement with ECC as the Highway and Transportation Authority will be needed. This then ensures a robust and sound transport evidence base, where modelling assumptions are refined, reviewed and reflect the final site allocations.
- We support the cross reference to minerals and waste local plans. ECC as the Minerals and Waste Planning Authority (MWPA) will provide UDC with detailed site assessments (of final sites) to ensure compliance and will consider the implications for the current Minerals Local Plan Review.
- We support references to sustainable drainage. ECC as the Lead Local Flood Authority will seek amendments to ensure the local plan takes account of the significant changes expected next year regarding how SuDS are approved as part of the planning process, and a detailed review of the final site allocations to determine sustainable drainage requirements and their impacts.

- We recommend the UDC Economic and Employment Strategy is updated to ensure consistency with the emerging Local Plan proposals and align with a clear sectoral strategy.
- The significant role London Stansted Airport plays within Uttlesford, its wider strategic role for Essex and the UK economy should be strengthened. Furthermore, its significant UK air freight/cargo role needs to be emphasised.
- London Stansted Airport policy needs to be reviewed and strengthened to ensure an appreciation of the planning context for the airport during the lifetime of the Local Plan. This will ensure the policy sets out sufficient mitigation and matters when considering any future applications.
- The need for the Local Plan to better reflect and integrate local public health evidence and include a Health Impact Assessment policy to achieve positive health and wellbeing outcomes.
- Discussions with ECC Adult Social Care need to take place to inform the specific locations of specialist housing provision, review policy locational and design requirements, and ensure the right mix and amenities are agreed. There is an opportunity to work with ECC and housing partners to build upon the housing needs evidence base developed in support of the Local Plan.

5. Links to our Strategic Ambitions

- 5.1 ECC aims to ensure that policies and related strategies, including those of neighbouring authorities, provide the greatest benefit to deliver economic renewal, ambition and equality to create a buoyant economy for the existing and future population that lives, works, visits and invests in. For strategic and cross boundary matters, this is likely to include a balance of land-uses to create great places for all communities, and businesses across all sectors; and that the developer funding for the required infrastructure is clear and explicit from the outset.
- 5.2 ECC is keen to inform, shape, support and help refine development strategy and policies delivered by Local Planning Authorities. Involvement is necessary and beneficial because ECC is:
- the Highway and Transportation Authority, including responsibility for the development and delivery of the Essex Local Transport Plan; the lead authority for Education including EYCC, SEN and Disabilities, and Post 16 education; the MWPA; the Waste Disposal Authority; the Lead Local Flood Authority (LLFA); lead advisor on public health; and has responsibilities for adult social care in relation to the securing the right housing mix which takes account of the specialist housing needs of older people and adults with disabilities;
 - an infrastructure funding partner which seeks to ensure that development proposed is realistic and does not place an unnecessary (or unacceptable) cost burden on the public purse and, specifically, ECC's capital programme;
 - a 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);
 - an advocate of the ECAC report Net Zero – Making Essex Carbon Neutral, providing advice and recommendations for action on climate change mitigation including setting planning policies which minimise carbon.
- 5.3 This response links to the following aims in The Future of Essex, which sets out the vision agreed by the Essex partners, as outlined on page 5 of the document, and is used to inform ECC plans and actions. It provides all communities in Essex

with a way to collaborate in planning for the future with regards to the following ambitions:

- Unite behind a sense of identity;
- Enjoy life into old age;
- Provide an equal foundation for every child;
- Strengthen communities through participation;
- Develop our County sustainably;
- Connect us to each other and the world; and
- Share prosperity for everyone.

5.4 The aim of the DULP is to provide the vision and framework for future growth and development in Uttlesford District, by shaping how and where development takes place, to develop healthy, green environments to live, work and prosper up to 2041 for existing and future residents and businesses. This is consistent with ECC objectives.

5.5 The ECC response seeks to ensure the following ECC policy objectives and guidance documents are reflected as the UDLP preparation continues:

- [ECC Everyone's Essex \(2021 – 2025\)](#)
- [Levelling Up – An Essex White Paper \(January 2022\)](#)
- [The Future of Essex](#)
- Essex Climate Action Commission - [Net-Zero: Making Essex Carbon Neutral \(July 2021\)](#) and [ECC Response](#)
- [Essex Joint Health and Wellbeing Strategy 2022 - 2026](#)
- [Essex Housing Strategy 2021-2025](#)
- [Essex Transport Strategy, the Local Transport Plan for Essex \(June 2011\)](#)
- [Essex Minerals Local Plan 2014](#)
- [Essex Minerals Local Plan Review \(2021\)](#)
- [Essex and Southend-on-Sea Waste Local Plan 2017](#)
- [Everyone's Library Service \(2022 - 2026\)](#)
- [Essex Design Guide](#)
- [School Organisation ECC 10 Year Plan for Essex school places \(2023 to 2032\)](#)
- [Early Years and Childcare Strategy \(2022 - 2027\)](#)
- [Joint Municipal Waste Management Strategy for Essex \(2007 - 2032\)](#)
- [ECC Developers' Guide to Infrastructure Contributions \(2023\)](#)
- [Essex Walking Strategy \(2021\)](#)
- [Bus Strategy \(2015\)](#)
- [Essex Bus Service Improvement Plan 2021 - 26](#)
- [Safer Greener, Healthier Communities](#)
- [Essex Cycling Strategy \(2016\)](#), [Essex Cycle Action Programme](#), and the [Uttlesford District Cycle Action Plan \(March 2018\)](#).
- Success Essex Board / Essex County Council (2020) Prosperity and Productivity Plan
- Essex Sector Development Strategy (2022) and its supporting Technical Report
- [Skills for Growth Strategy \(April 2019\)](#)
- [Essex Green Skills Infrastructure review \(March 2022\)](#)
- [North Essex Economic Strategy \(2019\)](#)
- [ECC Sustainable Drainage Systems Design Guide \(February 2020\)](#)
- [Essex Green Infrastructure Strategy \(2020\)](#)

6 Options

Option 1 – Submit ECC response to the DULP Consultation (recommended)

- 6.1 ECC can respond to the consultation and submit a response to UDC outlining where joint working needs to take place through the Duty (or any replacement) to ensure changes are made to the DULP, with next steps and additional evidence required, thereby seeking to influence the outcome and ensure ECC's responsibilities are covered, and the new local plan is viable and deliverable.
- 6.2 A summary of the proposed ECC response is provided in paragraphs 6.4 – 6.48. It is recommended that these comments form the basis for ECC's written representations submitted to UDC. The full proposed ECC response to the DULP is set out in Appendix 1 to this report.

Option 2 - Do not submit a response to the DULP consultation.

- 6.3 If ECC does not submit a response to the DULP, the risk is that ECC does not shape or influence the emerging proposals and ECC's statutory role and responsibilities in delivering the proposals will be compromised. By not engaging this would also be likely to increase the cost burden required to retrofit infrastructure requirements and service delivery costs where these fall to ECC.

ECC Response

- 6.4 The full ECC proposed response set out in Appendix 1.
- 6.5 The response is set within the context of national policy, including the NPPF, Planning Practice Guidance and ECC's organisation plan proposals within Everyone's Essex based on ECC's strategies, policies, objectives and evidence base. The response also makes reference to the ECAC Report 2021 [Net Zero – Making Essex Carbon Neutral](#) and the [ECC response](#) to that report. The ECC proposed response to the DULP therefore identifies what we support, where we object and where we recommend UDC undertake further work and engagement with ECC in order to refine and inform the next stage of the Local Plan preparation, scheduled for consultation June/July 2024. The ECC response is summarised below.

Summary of the Overarching Comments

Duty to Co-operate (the Duty)

- 6.6 ECC is committed to working with UDC as it prepares its Regulation 19 Local Plan. While this is not a duty to 'agree', regular and ongoing officer meetings (and at specific times with Members) need to resume to ensure all of ECC representations made to the DULP are discussed and resolved. Such meetings provide the opportunity for both Local Authorities to highlight matters to inform Local Plan preparation and ensure that the Local Plan is consistent with current ECC policy and guidance.
- 6.7 At this stage, ECC Officers are unclear how the discussions to date, and particularly the information provided to UDC in mid 2024 on school scenario testing, have been appropriately and fully considered and reflected in the DULP. This most notably relates to proposed new and expanded school provision and the quantum of development proposed at Saffron Waldon, Newport, Stansted Mountfitchet and Thaxted. Further information is provided in paragraphs 6.18 to 6.21.

- 6.8 ECC as the Highway and Transportation Authority will continue to engage with UDC, National Highways and Manchester Airport Group as local plan preparation continues. We acknowledge the work done to date and support UDC's commitment that the transport evidence will "be refreshed following the consultation ahead of the next stage of plan preparation in 2024". This will ensure a robust and sound transport evidence base is prepared, where modelling assumptions are reviewed, refined and reflect the final site allocations.
- 6.9 It is essential that Duty (or its replacement) discussions remain strong and ongoing and in particular attention is drawn to:
- ensuring full consideration is given to educational infrastructure (EYCC, primary, secondary, Post 16, training and skills) to meet the needs of future communities, which does not result in a cost burden to ECC;
 - transport discussions with key partners continue to ensure a full understanding of the emerging modelling and evidence to inform the Local Plan;
 - site policy requirements align and comply with the Essex Minerals Local Plan, the Minerals Local Plan Review, the Essex and Southend-on-Sea Waste Local Plan, and any surface water flood management matters identified by the LLFA; and
 - a review and update to the IDP that reflects a viable spatial strategy and site allocations (see paragraph 6.18 – 6.21).

Emerging Spatial Strategy contained in the DULP

- 6.11 Further discussions are sought on the spatial strategy, certain growth locations and site allocations to ensure the distribution and quantum of growth across the district and its location in key settlements can viably support the required infrastructure. Comments focus on Saffron Waldon, Newport, Stansted Mountfitchet and Thaxted (objections are made to Thaxted). ECC needs to ensure new development fully supports education provision and does not result in a cost burden to ECC; and also maximises opportunities for sustainable and active travel. We understand that UDC will review and update housing commitments and this is likely to influence the location and quantum of development proposed in the Submission Plan.
- 6.12 ECC notes that the DULP in paragraph 1.2 sets out an appreciation that "future growth is accommodated in a sustainable manner by: (bullet 5) ensuring development is accompanied by supporting infrastructure, such as new services and facilities". Similarly, the NPPF (and reflected in the DULP in paragraph 1.24) emphasises the importance of plans being positively prepared based on a strategy which seeks to meet development and infrastructure needs.
- 6.13 ECC supports and recognises the importance of preparing Local Plans that are infrastructure led. This requires developing a spatial strategy with a full understanding of potential infrastructure capacity; identifying where future incremental growth may be plausible, e.g. where rural services may be suffering from viability challenges with few numbers and where a scale of growth may increase the viability and deliverability of some key services; appreciating where future growth may be more challenging, and the scale/quantum of growth carefully considered with the ability to provide infrastructure for future communities.

- 6.14 As UDC reviews the comments submitted on its DULP consultation and prepares a Submission Plan, ECC seeks a closer role and ongoing collaboration with UDC to ensure the above objectives (and those outlined in paragraph 4.12 of this CMA) can be reflected in a refined strategy that is viable and will benefit Uttlesford's communities. At this stage we cannot fully support what was been put forward and accordingly seek refinements to this DULP.
- 6.15 ECC notes that there is need for the DULP to address the implications of the appeal decision at East of Highwood Quarry Great Dunmow (1,200 dwellings) (and perhaps others), which is a significant change to both the quantum and the distribution of residential growth in the district.
- 6.16 ECC would also like to further understand the implications of the 1,000 homes proposed on non-strategic sites that are yet to be identified by Parish Councils in Neighbourhood Plans, in order to ensure greater certainty on specific locations within the identified Larger Villages, infrastructure provision and funding.
- 6.17 Specific comments on growth locations are provided below.

Area Strategy Views

A. North Uttlesford

- 6.18 The matters that ECC raises within our response relating to these localities include:

Saffron Walden

- Sixth Form Centre – ECC recognises there needs to be a suitable and viable solution to secondary school provision in Saffron Walden and will work with UDC and Saffron Walden County High to further explore options. Reference is made to a “new Sixth Form Centre” which is proposed as part of Saffron Walden County High. At this stage ECC are not aware of such proposals and Saffron Walden County High has stated they will not consider a separate Sixth Form Centre. The proposal as framed is not deliverable and agreement on this matter must be sought otherwise it must be deleted.
- Early Years and Child Care – The DULP fails to plan for EYCC facilities. Given the scale of development proposed two 56 place facilities are estimated to be required, one co-located with the potential new primary school and the other a stand-alone facility.
- Transport Modelling – As expected at this early stage of plan preparation, work is required with ECC as the Highway and Transportation Authority to review and refine the modelling assumptions applied within the model. Of note -
 - Link Road connecting Thaxted Road and Radwinter Road – This is a proposed link road but its location and suitability for different forms of vehicle use, and alternative routing, must be further considered and agreed with ECC.
 - Sixth Form Centre – There is yet to be agreement on the Sixth Form Centre and the impacts of school travel on the transport network are not fully understood. The location of educational facilities and provision is key to understanding potential congestion, exploring the deliverability and viability of sustainable travel options.
 - Omissions in the Model – The employment designation to the southwest of the town needs to be modelled and the B1393 included. The forecast model will also need to include an agreed and acceptable level of sustainable travel modal split that reflects likely future patterns of travel behaviour.

Newport

- Newport Primary School – ECC recommends that further testing and discussions are required to determine whether this is a sustainable level of development in education terms. The school occupies a site with limited potential for expansion to accommodate growth. The spatial strategy is proposing 412 dwellings, this is inadequate to facilitate the delivery of a 2-form entry primary school.
- Early Years and Childcare – The DULP fails to plan for EYCC facilities. Given the scale of development proposed a new 30 place stand-alone EYCC facility is estimated to be required.

Great Chesterford

- Chesterford Research Park – ECC welcomes proposals at Chesterford Research Park and the economic opportunities provided for Essex. It is important the Local Plan proposes sustainable travel, through facilitating improved active travel, and links to local rail and bus routes.

B. South Uttlesford

6.19 The matters arising within the ECC response for this locality include –

Great Dunmow

- Helena Romanes Secondary School – The DULP refers to a new school at Great Dunmow. This is misleading as it is the relocation of the existing Helena Romanes school to a new campus and the secondary age range and capacity remains unchanged. Reference should be changed in the DULP.
- Church End – Valley Side Neighbourhood Extension (869 dwellings) – ECC welcomes further transport modelling discussions to ensure the transport needs for this site are appropriately assessed and considered. ECC queries evidence to support the allocation as road access is limited and there are challenges to facilitate sustainable travel.
- Proposed New Primary School Church End – Further testing and discussions are required as development of the scale proposed would not fully support a new school and ECC objects to the proposed new primary school in this location. Our response acknowledges that the DULP seeks to safeguard land for educational use.
- Early Years and Child Care – The DULP fails to plan for EYCC. Given the scale of development proposed a new 56 place EYCC either co-located or a stand-alone facility is required, subject to ECC concerns regarding the potential provision of a new primary school.

Stansted Mountfitchet

- Delivery of Sustainable and Active Travel Modes – ECC notes that development proposed to the north of Stansted Mountfitchet is located at the northern boundary of the settlement. Sustainable connections are limited, which is further exacerbated as existing developments do not provide opportunities. ECC recommends a holding objection pending a review of the Uttlesford Local Walking and Cycling implementation Plan, which may overcome this concern.
- Primary and Secondary School – Further testing and discussions are required as development of the scale proposed would not fully support a new school and the existing primary school cannot be expanded to accommodate the quantum of

growth. The proposed school site is adjacent to a scheduled ancient monument and consideration will need to be given to any impact on its setting. ECC also continues to welcome safeguarding land for educational use adjacent to Forest Hall School.

- Early Years and Child Care – The DULP fails to plan for EYCC. Given the scale of development proposed a new 30 place facility is estimated to be required. However, if a new primary school is provided then a co-located 56 place facility would be needed.

Takeley

- All Through School Proposal – ECC objects to the location of the ‘all through school’ site adjacent to the A120, as it is unlikely to be acceptable due to noise levels. ECC recommends identifying a more suitable location which meets the school site criteria set out in ECC’s Developers’ Guide for Infrastructure Contributions and the Garden Communities and Planning School Places Guide. Furthermore, the school allocations must be adjacent to each other to facilitate the establishment of the all-through school campus.
- Early Years and Child Care – The DULP fails to plan for EYCC. Given the scale of development proposed two new 56 place and one 30 place EYCC facilities are estimated to be required. If the all-through secondary school is provided then one 56 nursery should be co-located with the primary school and the other two as stand-alone facilities.
- Transport Modelling – The modelling requires refinement to replicate existing conditions at M11 J8, in particular the B1256 approach from Takeley which encounters significant queuing. This is likely to impact on how traffic exits any allocation in Takeley, impacting routes through the airport or junctions at Great Dunmow (capacity at A120 junction is an issue).
- Masterplanning – ECC recommends that a joint masterplan for the area be developed, including allocations at Stansted and Northside, to ensure the distribution and layout facilitate sustainable and active modes.
- Core Policy 11: London Stansted Airport – ECC does not support the current wording and recommends that this policy be strengthened to reflect national policy and provide a clear understanding of the anticipated planning context/growth anticipated during the plan period. Comments provide views on how the policy may be redrafted. Also see para 6.39-40 for ECC’s views on the Countryside Protection Zone (CPZ).

Thaxted Area Strategy

- 6.20 Thaxted is located within the east of the District and the designation by UDC in the DULP of Thaxted as a key settlement has been due to its location, scale and extent of the facilities that support Thaxted and the surrounding rural settlements.
- Proposed New Primary School – The scale of growth proposed at Thaxted is insufficient to make a new school viable. Furthermore, Thaxted Primary cannot be expanded, therefore the proposed growth is unsustainable in education terms, hence ECC objects to this proposal.
 - Early Years and Child Care – The DULP fails to plan for EYCC. Given the scale of development proposed a new 30 place EYCC facility is estimated to be required (subject to objections regarding the provision of primary education and level of growth at Thaxted).

- Sustainable Transport – There is lack of sufficient evidence to illustrate the suitability of the location on sustainable transportation grounds. There are also significant difficulties of sites linking onto the B184 (and the village centre) due to the minor nature of existing roads. ECC questions the use of the current bus service to enable persons living in more remote parts of Uttlesford to access local employment and education provision. Further transport evidence is required to enable ECC to support the proposed growth at Thaxted.

Rural Area Strategy

6.21 Uttlesford contains 13 larger villages, 24 smaller villages and a number of smaller settlements. The DULP sets out the rural strategy for these localities.

- Further Site Assessments – ECC notes that UDC is using the Local Plan consultation for Parish Councils and local communities to propose further allocations for development in the next version of the Local Plan (Submission Plan - Regulation 19). ECC would expect UDC to undertake appropriate site assessments that are supported by relevant evidence to determine whether there is appropriate social, physical, and environmental infrastructure to support such proposals. ECC welcomes further Duty to Cooperate discussions to discuss any sites brought forward, to understand the infrastructure needs, deliverability and viability.

Education

- 6.22 The new Uttlesford Local Plan needs to fully appreciate and reflect ECCs role as the lead authority for Education comprising primary, secondary (including sixth form), EYCC, Special Educational Needs and Disabilities (SEND), and Post 16 education; and a lead authority involved in adult learning and skills. ECC has a statutory duty under the Education Act 1996 (the Act) and the Childcare Act 2006 to secure sufficient childcare for working parents (inclusive of free provision). Under section 14 of the Act, local authorities must secure sufficient school places to serve their area.
- 6.23 It is noted that whilst the Uttlesford Draft IDP that accompanies the DULP includes references to EYCC, Post 16 and training and skills, the necessary requirements are not addressed in the DULP. ECC will work with UDC to ensure the Submission Plan includes requirements that reflect the spatial strategy.
- 6.24 The ECC response highlights that due consideration must be given to EYCC facility needs arising from local plan growth and provides UDC with an appreciation of the estimated scale of provision that is required for strategic development sites and localities. However, this will need to be refined once a final spatial strategy is agreed.
- 6.25 In reviewing UDC's proposed spatial strategy set out in the Area Strategies (Chapters 5 – 7) further discussions are sought with UDC and consideration given to the scale of growth proposed and the ability to deliver primary and secondary education to meet the needs of the future communities, otherwise there is an unacceptable financial burden on ECC to fund schools.
- 6.26 ECC have undertaken a detailed scenario test of a spatial strategy provided by UDC, however this varies from what is proposed in the DULP. Given ECC comments on proposed new primary and secondary schools and capacity at

existing schools, ECC will work with UDC to review the spatial strategy to ensure the full range of educational infrastructure needs for the future communities within Uttlesford are addressed.

- 6.27 ECC, as the lead authority for education, will therefore need to undertake a full housing scenario test (once a spatial strategy has been agreed) to assess the impact and suitability of individual development sites, particularly in terms of available school capacity, need for new schools, expansion of existing schools, and any need for school transport (which ECC will resist). This will be undertaken to support the Draft Local Plan scheduled for consultation in Summer 2024. An additional assessment will be undertaken to consider the implications on EYCC and SEND provision.

Transport

- 6.28 ECC acknowledges our involvement in the transport work that has taken place to date and support UDC's commitment that the transport evidence will "be refreshed following the consultation ahead of the next stage of plan preparation in 2024". As expected at this early stage of plan preparation, further work is required with ECC as the Highway and Transportation Authority to review and refine the modelling assumptions applied within the transport model. Furthermore, ECC are mindful that transport evidence is still being undertaken, and the outputs need to be considered to allow ECC to provide an informed view on the spatial strategy. ECC as the Highway and Transportation Authority will continue to engage with UDC (and National Highways) as plan preparation continues to review the implications from published evidence on the future spatial strategy and policies. Work will also continue on the A120 Multi-Modal Corridor Study and the Uttlesford Local Cycling Walking Implementation Plan.

Climate Change

- 6.29 It is recommended that ECC strongly supports the holistic approach to climate change and sustainability which is facilitated through the requirement for applicants to submit a Climate Change and Sustainability Statement. ECC notes and supports the inclusion of an overarching policy to address climate change, entitled Core Policy 1: Addressing Climate Change which then links to a suite of detailed policies that tackle specific issues. Furthermore, ECC notes and supports that UDC have sought to adopt the pan-Essex net zero policy approach. Our response provides further comments on how the precise wording of the policy may be amended to better reflect the Essex policy and recently adopted Local Plans from other local authorities nationally, therefore providing UDC with the most recent best practice examples for consideration. Climate Change provisions are considered very strong in the DULP.

Economic and Employment Strategy

- 6.30 ECC recommends that UDC update and review their Economic and Employment Strategy ensuring it is consistent with the emerging Local Plan. Within the strategy and supported by Local Plan policy the following matters should be included:
- the provision of a mix of employment units that aligns with a clear sectoral strategy;
 - how delivery is tied to occupation of housing to provide alignment between jobs and housing; and

- sustainable access to the employment opportunities, with as many commuting journeys as possible undertaken through walking, cycling and public transport.

Minerals and Waste

- 6.31 ECC as the MWPA welcomes the reference to the [Minerals Local Plan](#) (MLP) and the [Waste Local Plan](#) (WLP) forming part of the statutory Local Development Plan for Uttlesford.
- 6.32 ECC seeks discussions with UDC to consider the outputs of the MLP Review (in relation to which consultation will take place in February 2024) site assessment process and the relationship between these sites and the DULP and, more importantly, its next iteration (Regulation 19).
- 6.33 The MWPA has undertaken a high-level assessment of the DULP site allocations against the MLP and WLP and recommend individual site policies reference the need for a Mineral Resource Assessment, Minerals Infrastructure Impact Assessment and/or a Waste Infrastructure Impact Assessment to be undertaken, as set out in Appendix A. This will ensure compliance with the MLP and WLP; and any mineral resource is not sterilised, prior extraction can be considered as part of the non-mineral development process, and to ensure the continued and future operation of the waste and mineral infrastructure is not compromised.
- 6.34 ECC as the MWPA also recommend the emerging Local Plan Policies Map and/or other map(s) show relevant mineral mapping layers which the MWPA will supply to UDC.

London Stansted Airport

- 6.35 The ECC response recommends UDC strengthen the significant role that London Stansted airport plays within Uttlesford and its wider strategic role for Essex, the region and the UK economy. It is the third largest airport in the London system; and has the busiest single terminal airport in the UK with capacity and planning permission to accommodate further growth in movements, passengers and routes. Stansted is a driver for growth across Essex, the East of England and London, supporting jobs (over 12,000) and economic productivity (contributing (£1 billion annually to the national economy), and a key facilitator for the tourism sector. It is a key catalyst for wider economic growth and inward investment.
- 6.36 The ECC response seeks reference to Stansted's role in cargo air freight. The airport has planning permission for 16,000 cargo movements and is the UK's second largest cargo airport by weight. It is important that the Local Plan appreciates the matters that should be considered in the effective delivery of this role. The success of Stansted's cargo performance is due to its location as a gateway to London, the Southeast and the Midlands - onward travel connections provided by the M11 and A120 ensure that cargo can be distributed throughout the UK via the road network. There are also excellent freight handling facilities on site at the World Cargo Centre and opportunities for further development.
- 6.37 It is important to note that Stansted has been at the forefront of recognising the importance of having a skilled aviation sector. The Stansted Airport College (established in 2015) was the first purpose built college at a UK airport. ECC's response highlights where these roles can be emphasised.

- 6.38 ECC also recommends that UDC review Department for Transport aviation policy to ensure emerging local plan policy is strengthened, in particular the response highlights where Core Policy 11: London Stansted Airport may be enhanced. ECC does not support the current policy but provides clear direction on how it can be redrafted for clarity and focus to ensure sufficient mitigation is in place if future growth at the airport is proposed. The policy should also provide an understanding of the envisaged planning context for growth at Stansted throughout the plan period.

Countryside Protection Zone (CPZ)

- 6.39 ECC appreciates the value placed by residents and communities of the role that the CPZ performs within Uttlesford. It can be argued the CPZ has facilitated the protection of the rural character and setting of Stansted airport and has assisted in the airport being referred to as the ‘airport in the countryside’.
- 6.40 ECC notes that Core Policy 12: Airport Countryside Protection Zone seeks to facilitate the continued protection by the CPZ, however the policy map and Appendix 7 highlight the boundary of the CPZ has been reduced. ECC’s response recommends that any boundary change should be supported by justification/evidence, assessed against the CPZ’s role as outlined in Policy S8 of the 2005 Uttlesford Local Plan and aligned with any new local plan CPZ policy. It is acknowledged that in seeking to continue the application of this policy within the DULP shows that there may be merit in this policy provision. Any assessment should be proportionate to the scale of any boundary change and development proposed.

Green Infrastructure

- 6.41 ECC expects the Local Plan to make a strong commitment towards the delivery of multifunctional green infrastructure and biodiversity net gain. ECC broadly supports the approach taken in the DULP, but the ECC response highlights where this role can be better acknowledged, and how ‘multifunctional GI’ can assist in delivering other strategic objectives e.g. climate change, promoting active travel and enhancing mental and physical health.

Public Health and wellbeing

- 6.42 ECC, as lead advisor on public health matters, seeks stronger references to health and wellbeing to better reflect the NPPF and local evidence such as the Essex Joint Strategic Needs Assessment and Uttlesford Health and Well Being Strategy. The new local plan will also need to include a policy with regards to Health Impact Assessments (HIAs) for larger development proposals and to strengthen site allocation policies requiring HIAs on large strategic housing site allocations. ECC recommend the site thresholds contained in the ‘Essex Healthy Places Advice - Notes for planners developers and designers’ (hosted on the Essex Design Guide website) should be incorporated into policy, as these have been incorporated into most districts recently adopted Local Plans. The Hot Food Takeaway policy also needs review. On all these matters ECC can assist UDC.

Adult Social Care / Independent Living.

- 6.43 It is recommended that UDC engage ECC to explore further and provide additional evidence, on the requirements and needs for specialist and supported housing for vulnerable adults within the district and related infrastructure and how this can be incorporated into the Strategic Housing Needs Assessment evidence. ECC

welcomes the acknowledgement of the need to consider addressing the specialist housing needs within Core Policy 54. ECC would welcome the opportunity to explore how existing proposed housing policies can better incorporate extra-care housing and independent living; supported living for people with disabilities and/or care needs and provision of affordable housing for those leaving supported accommodation, including care leavers.

Developer Contributions and Community Infrastructure Levy (CIL)

- 6.44 It is recommended that ECC seek the review of the overarching section 106 and CIL policy to ensure a consistent approach and framework for the delivery of relevant infrastructure from developers. ECC would also support UDC adopting CIL. UDC is still to progress work on CIL and refine its IDP. Consequently, at this stage of plan preparation it is not possible to consider any infrastructure funding gap or identify the cost of infrastructure required to support the Local Plan. Hence, work has not progressed with regards assessing the viability of the Plan itself, and an appropriate CIL charging rate.

Infrastructure Delivery Plan (IDP)

- 6.45 ECC will work with UDC as it prepares an update to the IDP. All new development will be required to be supported by the required local and strategic infrastructure, where the IDP will reflect up to date costings, is aligned with development phasing and requirements are appropriately reflected in Local Plan and site allocations policies. It is important to acknowledge that the IDP is a 'living document' with the information provided therein regarding necessary infrastructure and its costs being a 'snapshot' in time. The information within the IDP will be subject to further review as part of the detailed planning application process, where specific details will become known about the land use mix, housing mix, site and wider infrastructure requirements and their detailed costings (including indexation).

Format of DULP

- 6.46 ECC recommend the 'Site Development Templates' are turned into 'Site Allocation Policies' in the next iteration of the Plan to give them more weight and clear guidance to developers.

General comments

- 6.47 A range of general comments to support consistency and clarity are provided for the consideration of UDC in the preparation of the new Local Plan.
- 6.48 The public consultation documents relied on can be viewed [here](#) on the UDC dedicated consultation website page. They also include a link to the evidence base, background studies and topic papers.

7. Issues for consideration

Financial implications

- 7.1 There are no direct financial implications in respect of ECC's response to the consultation. The involvement of ECC in the preparation of the Local Plan through to examination will involve staff resource implications, however, it is anticipated that this will be managed within existing budgets.

- 7.2 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. The ECC response seeks to ensure the Submission Plan (June/July 2024) includes site specific and 'infrastructure delivery and impact mitigation' policies that cover ECC requirements to make development acceptable in planning terms in relation to education, highways and transport, and sustainable drainage provision. ECC will also be working collaboratively with UDC on refining the IDP to support the local plan and viability process, and strongly recommends the preparation of CIL.
- 7.3 The proposed response states there is a need for further scenario testing and evidence base work and as a result, the requirements and cost implications for some of these matters are still to be clearly identified and agreed between UDC and ECC, before the local plan is submitted for examination in Autumn 2024.

Legal implications

- 7.4 The duty to -cooperate is contained in the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2011. It requires Local Planning Authorities to ensure that local planning authorities lead strategic planning effectively through their Local Plans addressing social, environmental and economic issues that can only be addressed by effectively working with other authorities beyond their own administrative boundaries. A new UDC Local Plan will have an impact on ECC's functions.
- 7.5 Paragraphs 24 to 27 of the NPPF stress that close cooperation between District Councils and County Councils in two tier areas will be critical to ensure that both tiers are effective when planning for strategic matters and necessary infrastructure.
- 7.6 Although a Local Plan may be found unsound at Examination if the duty to cooperate 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 at the next stages, including through to the Examination stage if not resolved.

Equality and Diversity implications

- 8.1 The Public Sector Equality Duty applies to the Council 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.
- 8.2 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).

- 8.3 It is common practice that an Equality Impact Assessment (EqIA) is undertaken by the Local Authority to inform the plan making process. This is normally relied on by ECC. UDC have undertaken a separate EqIA to inform the emerging Local Plan and ECC rely on that Assessment.

9. List of appendices

- 9.1 Appendix 1 – full proposed ECC response to the Draft Uttlesford Local Plan 2021-2041 (Regulation 18) Consultation, November 2023.

10. List of Background papers

- 10.1 None

I approve the above recommendations set out above for the reasons set out in the report.	Date
Councillor Lee Scott, Cabinet Member for Planning a Growing Economy	08 January 2024

In consultation with:

Head of Planning and Sustainable Development Graham Thomas, on behalf of Steve Evison – Director for Sustainable Growth	14 December 2023
Executive Director, Corporate Services (S151 Officer) Ian Fulton, on behalf of Nicole Wood	19 December 2023
Monitoring Officer Jacqueline Millward, on behalf of Paul Turner - Director, Legal and Assurance	04 January 2024
Head of Profession Strategy Nadia McLeod on behalf of Richard Puleston Director, Policy Unit	08 January 2024