

**Equality Impact Assessment / Equality Analysis  
(updated May 2021)**

Title of service or policy	<b>Sustainable Construction Checklist SPD</b>
Name of directorate and service	Planning Policy
Name and role of officers completing the EIA	Kaoru Jacque -Principal Planning Officer Alex McCann – Climate Policy (Planning) Officer
Date of assessment	25 <sup>th</sup> / March / 2022

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where

equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council’s website.

1. Identify the aims of the policy or service and how it is implemented.								
	Key questions	Answers / Notes						
1.1	<p>Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> <li>How the service/policy is delivered and by whom</li> <li>If responsibility for its implementation is shared with other departments or organisations</li> <li>Intended outcomes</li> </ul>	<p>The overall purpose of the Sustainable Construction Checklist SPD (SCC SPD) is to provide further guidance on the emerging policies in the Local Plan Partial Update (LPPU) on sustainable construction.</p> <p>The LPPU has introduced new policies on sustainable construction as below.</p> <table border="1"> <tr> <td>Policy SCR6 Sustainable Construction Policy for New Build Residential Development</td> <td>Sets requirements for Space Heating, Energy Use Intensity and Renewable Energy</td> </tr> <tr> <td>Policy SCR7 Sustainable Construction Policy for New Build Non-Residential Buildings</td> <td>Requires Major non-residential buildings to demonstrate 100% carbon reduction from building regulations and this will include details of renewable energy use.</td> </tr> <tr> <td>Policy SCR8 Embodied Carbon</td> <td>Introduces a requirement for large scale development to submit an embodied carbon assessment.</td> </tr> </table> <p>The SPD is only supplementing the policies included in the current Local Plan and new policies in the LPPU and does not introduce new policies. The current Local Plan and LPPU policies were subject to</p>	Policy SCR6 Sustainable Construction Policy for New Build Residential Development	Sets requirements for Space Heating, Energy Use Intensity and Renewable Energy	Policy SCR7 Sustainable Construction Policy for New Build Non-Residential Buildings	Requires Major non-residential buildings to demonstrate 100% carbon reduction from building regulations and this will include details of renewable energy use.	Policy SCR8 Embodied Carbon	Introduces a requirement for large scale development to submit an embodied carbon assessment.
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Policy SCR8 Embodied Carbon	Introduces a requirement for large scale development to submit an embodied carbon assessment.							

		<p>separate Equality Impact Assessment and consulted through the process.</p> <p>The intended outcome of the SPD is to make it easier to assess policy compliance with sustainable construction policies which facilitate better align with, and help to deliver, the core aims of B&amp;NES' Climate Emergency resolution.</p> <p>The responsibility of its implementation is shared between Planning Policy, Development Management, Building Control, Sustainability and Website Teams.</p> <p>The SPD is part of the Council's response to declaration of Climate Emergency and broader sustainability. It will facilitate the Council's commitment in the Environmental Sustainability &amp; Climate Change Strategy to achieve carbon neutral by 2030. It will also help meet the target in the adopted Placemaking Plan to install 110MW of renewable electricity and 165MW of renewable heat by 2029. This will help to ensure we deliver sustainable development to meet the needs of the local people.</p>
<p><b>1.2</b></p>	<p>Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> <li>● Is it a new service/policy or review of an existing one?</li> <li>● Is it a national requirement?).</li> <li>● How much room for review is there?</li> </ul>	<p>The SCC SPD contains the Checklist with key assessment tables which should be submitted with applications for new build residential properties and major new non-residential buildings as well as major works on existing buildings.</p> <p>This is an update from the Current Checklist.</p> <p>The policy guidance in the SPD seeks to respond to B&amp;NES's Climate Emergency Declaration.</p>

1.3	Do the aims of this policy link to or conflict with any other policies of the Council?	<p>A key objective of this SPD is to help address the Climate Emergency. Therefore, it aligns with the aims of the Sustainability Team, the Corporate Plan, the Council's Vision and Values and the Climate Change Declaration and Strategy.</p> <p>Aside from the associated policies (CP1, SCR6, SCR7, SCR8 and SCR5) within the SPD, the SPD is also linked to CP3 on renewable energy generation.</p>
<h2>2. Consideration of available data, research and information</h2>		
<p>Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:</p> <ul style="list-style-type: none"> <li>● <b>Demographic</b> data and other statistics, including census findings</li> <li>● Recent <b>research</b> findings (local and national)</li> <li>● Results from <b>consultation or engagement</b> you have undertaken</li> <li>● Service user <b>monitoring data</b> (including ethnicity, sex, disability, religion/belief, sexual orientation and age)</li> <li>● Information from <b>relevant groups</b> or agencies, for example trade unions and voluntary/community organisations</li> <li>● Analysis of records of enquiries about your service, or <b>complaints</b> or <b>compliments</b> about them</li> <li>● Recommendations of <b>external inspections</b> or audit reports</li> </ul>		
	<b>Key questions</b>	<b>Data, research and information that you can refer to</b>
2.1	What equalities training have staff received to enable them to understand the needs of our diverse community?	Planning Policy team have received corporate equalities training and EqIA training. A number of the service deliverers within the Council will have recently received corporate equalities training.
2.2	What is the equalities profile of service users?	The SPD will be used by applicants who are submitting planning applications, therefore the equalities profile of service users would

		include developers, planning agents as well as individual households.
2.4	Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?	No recent customer satisfaction survey undertaken. One of the reasons to update the SPD is to make the document user friendly responding to the feedback we received since the adoption of the current SPD.
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	Internal consultation with colleagues in Development Management.  Wider engagement via draft consultation will take place following the Single Member Decision process in May.
2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	Public consultation. Designing a user friendly document and work with the Web team to ensure easy to navigate.

### 3. Assessment of impact: 'Equality analysis'

	Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy: <ul style="list-style-type: none"> <li>• Meets any particular needs of equalities groups or could help promote equality in some way.</li> <li>• Could have a negative or adverse impact for any of the equalities groups</li> </ul>		
		<b>Examples of what the service has done to promote equality</b>	<b>Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this</b>
3.1	<b>Issues relating to all groups and protected characteristics</b>	The technical nature of the document could be challenging for those without sustainable construction expertise. The document has therefore been simplified	For paragraph 1, the information required is included in the Standard Method Procedure which is part of the Building Regulations which will be prepared by a specialist.

		<p>to make it as easy as possible to navigate and understand.</p> <p>Most retrofitting and sustainable construction measures require planning consent; this costs money, it can be time-consuming, and some people may find the planning application process difficult to navigate.</p> <p>Those who have difficulties achieving affordable warmth is a large issue in B&amp;NES. These households are less likely to be able to afford the cost of sustainable construction measures.</p>	<p>Steps to address paragraphs 2 and 3 have been carried out in the Energy Efficiency, Retrofitting &amp; Sustainable Construction SPD. For those who may struggle to understand the technical nature of the document, we are able to offer additional staff time to explain this information to service users.</p> <p>In reducing potential costs to those carrying out sustainable construction and retrofitting measures, guidance on how to apply for any available grant and loan schemes will be made readily available.</p>
<b>3.2</b>	<b>Sex</b> – identify the impact/potential impact of the policy on women and men.	The proposals in the draft SPD are very unlikely to impact people differently whether or not they are woman or a man. However, should someone consider that this is in fact the case we will consider the points made.	None identified
<b>3.3</b>	<b>Pregnancy and maternity</b>	The proposals in the draft SPD are very unlikely to create any particular issues relating to pregnancy or maternity. However, should someone consider that this is in fact the case we will consider the points made.	None identified
<b>3.4</b>	<b>Gender reassignment</b> – identify the impact/potential impact of the policy on transgender people	The proposals in the draft SPD are very unlikely to impact on people who are undergoing/have undergone gender reassignment. However, should someone consider that this is in fact the case we will consider the points made.	None identified

3.5	<b>Disability</b> – identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)	The SPD covers a technical and complex subject matter and certain groups may not understand the information related to energy efficiency, renewable energy, and/or sustainable construction.  People may not understand what relevance the SPD has to them and therefore they do not become involved in the process.	For those who may struggle to understand the technical nature of the document, we are able to offer additional staff time to explain this information to service users.
3.6	<b>Age</b> – identify the impact/potential impact of the policy on different age groups	As in 3.1 above	None identified
3.7	<b>Race</b> – identify the impact/potential impact on across different ethnic groups	As in 3.1 above	None identified
3.8	<b>Sexual orientation</b> – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people	As in 3.1 above	None identified
3.9	<b>Marriage and civil partnership</b> – does the policy/strategy treat married and civil partnered people equally?	As in 3.1 above	None identified
3.10	<b>Religion/belief</b> – identify the impact/potential impact of the policy on people of different	As in 3.1 above	None identified

	religious/faith groups and also upon those with no religion.		
<b>3.11</b>	<b>Socio-economically disadvantaged*</b> – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances <b>(this is not a legal requirement, but is a local priority).</b>	As in 3.1 above	None identified
<b>3.12</b>	<b>Rural communities*</b> identify the impact / potential impact on people living in rural communities	As in 3.1 above	None identified
<b>3.13</b>	<b>Armed Forces Community **</b> serving members; reservists; veterans and their families, including the bereaved. Public services will soon be required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).	The proposals in the final SPD are very unlikely to create an impact on individuals in the Armed Forces Community. However, should someone consider that this is in fact the case we will consider the points made.	None identified.

\*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

\*\* The Equality Act does not cover armed forces community. However, when the Armed Forces Bill becomes law there will be a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

#### **4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan**

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Actions relating to the Draft SPD (actions continued where appropriate):

<b>Issues identified</b>	<b>Actions required</b>	<b>Progress milestones</b>	<b>Officer responsible</b>	<b>By when</b>
The SPD should be available in an accessible format for all users, including those with physical and sensory impairments.	Ensure that an interactive and visual web-format of the guide is available in addition to the PDF version, ready when the SPD is adopted.	Share draft consultation document and final draft SPD work with Web Team.  Project lead Officers web and Policy teams to work together collaboratively as needed to produce web-version of the SPD which delivers on intended outcomes.	Web and Planning Policy Team	Before the SPD is published for consultation in May 2022 and is adopted later 2022.

Certain groups may not feel comfortable, or may not be able to, express their views on the emerging revised SPD.	Ensure that a range of consultation formats are available over an adequate consultation period to ensure that people are able, and have the time, to comment on the final draft SPD.	A 6-week public consultation period will take place online. There is also the potential to have hard-copies of the SPD draft available.	Communications and Planning Policy Team	April/May 2022
Information in the SPD hard to understand without sustainable construction expertise.	Continue to review the document so that it is easily understood and navigable.	Ensure the SPD is maximised in terms of these elements prior to public consultation.	Planning Policy	April/May 2022

Actions relating to the final SPD:

### 5. Sign off and publishing

Once you have completed this form, it needs to be ‘approved’ by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team ([equality@bathnes.gov.uk](mailto:equality@bathnes.gov.uk)), who will publish it on the Council’s and/or NHS B&NES’ website. Keep a copy for your own records.

**Signed off by:**

(Divisional Director or nominated senior officer)

**Date:**