



**South
Cambridgeshire
District Council**

EQUALITY IMPACT ASSESSMENT

Full Assessment Form

This form is for use in undertaking a full equality impact assessment of a policy following the findings from an equality screening.

Name of Policy being assessed	Greater Cambridge Sustainable Design and Construction SPD
Service Area	Planning
Lead Officer	Emma Davies
Team	Greater Cambridge Shared Planning Policy Team
Completion date of equality screening	1 July 2019
Start date of assessment	10 June 2019
Completion of assessment	1 July 2019

A. STATUS AND SCOPE OF THE POLICY BEING ASSESSED

For the purposes of this assessment, the term 'Policy' refers to a Policy, Strategy, Programme, Procedure, Function or Decision.

A1. What are main aims, objectives, purpose and intended outcomes of the Policy?

The SPD has been prepared to provide guidance on the implementation of policies related to climate change and sustainable design and construction in the South Cambridgeshire Local Plan 2018 (and the Cambridge Local Plan 2018). For the South Cambridgeshire Local Plan, it provides guidance on the following policies:

Chapter 4: Climate Change

- Policy CC/1: Mitigation and Adaptation to Climate Change
- Policy CC/3: Renewable and Low Carbon Energy in New Developments
- Policy CC/4: Sustainable Design and Construction
- Policy CC/5: Sustainable Show Homes.
- Policy CC/6: Construction Methods

Chapter 6: Protecting and enhancing the Natural and Historic Environment

- Policy NH/4: Biodiversity
- Policy NH/15: Heritage Assets and Adapting to Climate Change

Chapter 9: Promoting successful communities

- Policy SC/10: Lighting proposals
- Policy SC/11: Noise Pollution
- Policy SC/12: Contaminated Land
- Policy SC/13: Air Quality
- Policy SC/15: Odour and Other Fugitive Emissions to Air

Guidance in the SPD takes the form of details of the documents that need to be submitted with planning applications and the information to be included in those documents. Proformas to be used to provide information such as carbon calculations and air quality information are included alongside a sustainability checklist to be submitted with applications to demonstrate how meeting policy requirements has been integrated into the design of new developments.

A2. What is the status of this Policy? (New, existing or under review)

The draft Greater Cambridge Sustainable Design and Construction SPD is a new document which expands and provides additional guidance on the application of policies contained within the adopted South Cambridgeshire Local Plan (September 2018).

A3. What is the timescale and decision-making route for approval of the Policy?

The draft SPD will be subject to a formal public consultation from 15 July to the 23 September 2019. During the consultation the draft SPD and supporting documents will be available to view on the SCDC website and paper copies made available the reception of South Cambridgeshire Hall.

It is intended, subject to the volume and content of representations received, that the SPD will be presented to Cabinet for adoption in January 2020.

A Statement of Consultation will be produced and will detail the representations received and any subsequent amendments proposed to the draft SPD before it is adopted.

A4. Is this policy associated with the Council's strategic Aims, Approaches and Actions (The Three 'A's)? If so, please state the relevance and association to The Three 'A's.

It is linked to the Council's Aim of putting the heart into Cambridgeshire by:

- **Housing that is truly affordable for everyone to live in** – By ensuring that new homes are built to the highest possible sustainability standards, and incorporate renewable energy technologies and water saving devices, this can help to ensure that homes remain affordable not just to buy but to also live in by reducing energy and water bills.
- **Being green to our core** – The SPD will provide guidance on the implementation of policies related to climate change and sustainable construction, helping to ensure that all new development plays a role in responding to our changing climate and meeting national targets for carbon reduction.

A5. Who are the intended beneficiaries/stakeholders of the policy or function? How many people are affected and from what sections of the community?

The SPD has been prepared to provide a clear framework to assist decision making relevant to the delivery of new development across the Greater Cambridge area. It provides technical guidance for developers and other applicants on the information that needs to be submitted with planning applications to demonstrate compliance with adopted planning policies related to climate change and sustainable design and construction. In providing such guidance, the SPD will ensure that new development contributes to meeting the challenges posed by our changing climate including:

- Contributing to carbon reduction targets and reducing fuel poverty;
- Ensuring that new development is adaptable to our changing climate;
- Ensuring that new development makes efficient use of resources;

The SPD will apply to new development across South Cambridgeshire, and as such it is anticipated the SPD has the potential to affect a large and wide ranging proportion of the community.

Stakeholders include, but are not limited to:

- Residents across the district.
- Local Parish Councils
- Local Members
- Cambridgeshire County Council
- Adjacent Local Authorities
- Cambridgeshire and Peterborough Combined Authority
- Delivery partners, including land owners, developers, infrastructure providers, transport providers
- Community organisations
- Local businesses

A6. Are external partners involved in delivering this policy? If so, what are their roles, and level of involvement/influence?

Yes. The District Council as the Local Planning Authority works in partnership with Cambridgeshire County Council, Greater Cambridge Partnership, the landowners and promoters, and with local communities and interest groups when delivering new development. The SPD will provide additional guidance to ensure that new development in the area contributes to meeting the challenges posed by our changing climate, reducing the environmental impact of new development.

B. EVIDENCE, DATA AND CONSULTATION

It is important to consider all information that is available in determining whether the Policy could have a differential impact. Please include examples of monitoring information, research or consultation reports.

B1. What monitoring or other information do you have about relevant target groups, which will show the impact of the Policy?

The County Council Research Group provides a break down of Census information in district and ward level profiles. This includes useful information on Gender, Age, Race, Disability, and Religion / Faith.

The South Cambridgeshire District Council [Equality Scheme](#) also provides a helpful district-wide snapshot of the people of South Cambridgeshire (see B2).

Local Plan Monitoring Indicators will help review the success of the SPD.

Official statistics on Fuel Poverty: <https://www.gov.uk/government/collections/fuel-poverty-statistics> and [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/683010/Fuel and Energy February 2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/683010/Fuel_and_Energy_February_2018.pdf)

Cabinet Office (2017), 'Race Disparity Audit: Summary Findings from the Ethnicity Facts and Figures Website': <https://www.ethnicity-facts-figures.service.gov.uk/static/race-disparity-auditsummary-findings.pdf>

Local statistics for fuel poverty: <https://data.cambridgeshireinsight.org.uk/story/fuel-poverty-cambridge-sub-region>

B2. Have you compared the data you have with the equality profile of the local population? What does it show?

The Council's [Equalities Scheme](#) shows South Cambridgeshire is a rural area with a population which is expected to grow at faster than the national average. A growing elderly population, greater mobility, immigration and other social trends are making changes to the population. These changes will accelerate as a result of the population growth facing the district in the next ten years or so, leading to a far more diverse society than previously. The following is a snapshot of the people of South Cambridgeshire:

- At present approximately 19% of the South Cambs population falls within the 65+ age group and this is expected to grow to approx. 22% in 2031.

- In 2011 approx. 14% declared a disability whereby day-to-day activities are limited a little or a lot.
- The 2011 Census data shows that in South Cambridgeshire 87.3% of the population were White British (which has fallen in the last ten years from 93.2%) and 6% declared themselves as White Irish, White Gypsy/Irish Traveller and White Other.
- The gender split is similar to the national average with 50.3% being female and 49.7 male.
- Christianity is the largest stated religion in South Cambridgeshire at 58.8% (down by 13.2% from the last Census in 2001) and the biggest non-Christian religion is Islam, which comprises 0.98% of the population. Over 30% of all residents claim to have 'no religion' (a further 7.46% did not state any religion or faith).
- No local data is available on the transgender and transsexual community in South Cambridgeshire.
- South Cambridgeshire is a very affluent area and is in the least deprived 5% of local authorities based on the Indices of Deprivation (IND) annual scores; however the district exhibits a pattern of scattered deprivation in some of its rural wards.
- Fuel poverty in South Cambridgeshire saw a slightly increase between 2013 and 2014, rising from just above 7% of households to nearly 8% of households.

The SPD is expected to have positive impacts on several protected characteristics, including age, disability, race, pregnancy and maternity and rurality (see D). This is largely as a result of the potential for guidance in the SPD to help improve the energy efficiency of new homes being built in the area, thereby helping to reduce fuel poverty amongst residents.

B3. Have you identified any improvements or other changes that could be made from monitoring the data?

The SPD should assist with the delivery of the highest quality sustainable development, taking into account local opinions expressed through the public consultation exercise. Local people, including existing residents, will continue to have the opportunity to share their experience and help to shape the place in which they live and work.

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B4. Have you consulted or involved external stakeholders about the policy or function? If so, what were their views?

The draft SPD will be subject to a formal public consultation from 15 July to the 23 September 2019 with a range of external stakeholders including the general public. During the consultation the draft SPD and supporting documents will be available to view on the SCDC website and paper copies made available at South Cambridgeshire Hall.

The Council will ensure the consultation is accessible to all. A wide range of stakeholders, including equalities organisations representing the interests of the protected characteristics, will be notified of the consultation. Consultation documents will be made available in accessible formats, in paper and online. Comments on the draft SPD can be provided using various electronic and paper methods, and Council officers are able to assist if anyone has specific needs.

A Statement of Consultation will be produced and will detail the representations received and any subsequent amendments proposed to the draft SPD before it is adopted.

B5. Have you undertaken any consultation with staff to assess their perception of any impacts of the policy or function? If so, what has been learnt from them?

The SPD has been developed with input from and in consultation with staff from across the Greater Cambridge Shared Planning Service and other departments including Environmental Health, Sustainable Communities and officers working in Cambridge City Council's Streets and Open Spaces team. This has helped to inform some of the technical guidance within the SPD as well as helping to ensure that the layout of the SPD is as easy to navigate as possible.

B6. Please provide information about any other consultation, research, or involvement undertaken in relation to this impact assessment.

The SPD will be published for formal public consultation between the 15 July and 23 September 2019, as detailed in B4 above. Consultation will accord with the Council's Statement of Community Involvement. A list of consultees is included in the Statement of Consultation which accompanies the SPD.

Based on the evidence and information you have gathered, and any consultations you have carried out, you should:

- Identify any **opportunities to advance equality of opportunity or foster good relations** for people with different protected characteristics (Section C) and;
- **Assess the likely differential impact** – positive or negative - of the policy on people with protected characteristics (Section D).

It is important to **identify whether the Policy could affect some groups of people differently** (a 'differential impact'). It is particularly important to consider whether the policy would *discriminate against or disadvantage people* on the grounds of any of the protected characteristics, or whether there are *any opportunities to better promote equality or good relations* between different groups of people through modifying the Policy.

Use the table below to summarise the findings of the information and evidence you have gathered. This might include statistical data, external research, or feedback from formal or informal consultations with staff or residents. Consider the information as it relates to the range of protected characteristics (listed in the left hand column) before proceeding to Section D.

If there is no information available about the impact (or potential impact) of the Policy on people with a particular protected characteristic, you should note this in the table.

C. OPPORTUNITIES TO ADVANCE EQUALITY OF OPPORTUNITY OR FOSTER GOOD RELATIONS				
You do not need to fill in every single box. The questions are there as a guide, and are prompts to help you consider the way that a policy or decision will impact on people with different protected characteristics before proceeding to Section D.				
Protected Characteristics	What does the information or evidence we have gathered tell us about the impact of this Policy on different groups of people?			
	Does the evidence suggest that people with different protected characteristics have different needs or experiences in relation to this Policy?	Could any aspect of the Policy amount to discrimination (either direct or indirect) against people on the grounds of a protected characteristic?	In what ways does this Policy promote opportunities to advance equality of opportunity or foster good relations between people with different characteristics (e.g. male and female; different racial groups)	From the evidence you have gathered, what opportunities might there be to better promote opportunities to advance equality of opportunity or foster good relations between different groups of people through modifying the Policy in some way?
Age	Yes	No	The SPD seeks to ensure that all new housing is built to be energy efficient and utilises renewable	None

			energy, which, if correctly implemented, should have a positive impact on residents through reducing energy bills, helping to address fuel poverty for residents moving into new homes.	
Disability	Yes	No	The SPD seeks to ensure that all new housing is built to be energy efficient and utilises renewable energy, which, if correctly implemented, should have a positive impact on residents through reducing energy bills, helping to address fuel poverty for residents moving into new homes.	None
Gender Reassignment	No	No	<i>Not directly relevant</i>	None

Marriage and Civil Partnerships	<i>No</i>	<i>No</i>	<i>Not directly relevant</i>	<i>None</i>
Pregnancy and Maternity	<i>Yes</i>	<i>No</i>	The SPD seeks to ensure that all new housing built to be energy efficient and utilises renewable energy, which, if correctly implemented, should have a positive impact on residents through reducing energy bills, helping to address fuel poverty for residents moving into new homes.	<i>None</i>
Race	<i>Yes</i>	<i>No</i>	The SPD seeks to ensure that all new housing is built to be energy efficient and utilises renewable energy, which, if correctly implemented, should have a positive impact on residents through reducing energy	<i>None</i>

			bills, helping to address fuel poverty for residents moving into new homes.	
Religion/ Belief	<i>No</i>	<i>No</i>	<i>Not directly relevant</i>	<i>None</i>
Sex	<i>No</i>	<i>No</i>	<i>Not directly relevant</i>	<i>None</i>
Sexual Orientation	<i>No</i>	<i>No</i>	<i>Not directly relevant</i>	<i>None</i>
Others e.g. Rurality; caring responsibility; working pattern etc.	<i>Yes</i>	<i>No</i>	The SPD seeks to ensure that all new housing is built to be energy efficient and utilises renewable energy, which, if correctly implemented, should have a positive impact on residents through reducing energy bills, helping to address fuel poverty for residents moving into new homes.	<i>None</i>

D. DIFFERENTIAL IMPACT OF THE POLICY

Assess the potential differential impact on each of the following protected characteristics. The impact could be negative, positive or neutral. **If you assess a negative impact for any of the groups then you will need to assess whether that impact is low, medium or high.**

DESCRIPTION OF IMPACT	Nature of Impact (Positive, Neutral, Adverse)	Extent of Impact (Low, Medium, High)
<p>AGE: Identify the potential impact of the policy or function on different age groups.</p> <p>The SPD seeks to ensure that all new housing built in the Greater Cambridge area is built to be energy efficient and utilises renewable energy, which, if correctly implemented, should have a positive impact on residents through reducing energy bills, helping to address fuel poverty for residents moving into new homes.</p> <p>Older people (as reported by Age UK over the years) are especially likely to be vulnerable to fuel poverty.</p> <p>Where older people and children have long-term health conditions, these can be worsened by the effects of fuel poverty. Single parents and their children are most likely to be affected by fuel poverty compared to other household sizes, as 26.4% struggle to afford to pay their bills.</p>	Positive	Low - medium
<p>DISABILITY: Identify the potential impact of the policy or function on disabled people.</p> <p>The consultation documents for this policy will be made available in alternative formats where required, upon request, such as in large print or braille.</p> <p>The SPD seeks to ensure that all new housing built in the Greater Cambridge area is built to be energy efficient and utilises renewable energy, which, if correctly implemented, should have a positive impact on residents through reducing energy bills, helping to address fuel poverty for residents moving into new homes. Long-term health conditions, including mental health, could be caused or exacerbated by effects of living in fuel poverty so the SPD could have a positive impact related to disability.</p>	Positive	Low
<p>GENDER REASSIGNMENT: Identify the potential impact of the policy or function on people that have changed gender identity.</p>		
<p>There is no evidence that the SPD will have detrimental impacts on people due to gender reassignment.</p>	Neutral	

MARRIAGE AND CIVIL PARTNERSHIPS: Identify the potential impact of the policy or function on people who are married or in a civil partnership.		
There is no evidence that the SPD will have detrimental impacts on people due to marriage and civil partnerships.	Neutral	
PREGNANCY AND MATERNITY: Identify the potential impact of the policy or function on pregnant or maternal mothers and those women who wish to breastfeed.		
<p>The consultation process from July to September 2019 has been extended in order to allow for the school holiday period. This will have a positive impact related to maternity by providing people with children opportunity to feedback.</p> <p>The SPD seeks to ensure that all new housing built in the Greater Cambridge area is built to be energy efficient and utilises renewable energy, which, if correctly implemented, should have a positive impact on residents through reducing energy bills, helping to address fuel poverty for residents moving into new homes. Single parents and their children are most likely to be affected by fuel poverty compared to other household sizes, as 26.4% struggle to afford to pay their bills.</p>	Positive	Low - medium
RACE: Identify the potential impact of the policy or function on different ethnic groups, including national origins, colour and nationality.		
<p>The consultation documents will be translated upon request.</p> <p>National research has found that ethnic minority groups' housing tends to be of lower quality, especially among households of Pakistani origin. Poor quality housing that is low in energy efficiency can cause fuel poverty. The SPD could have a positive impact for some ethnic groups then as it seeks to ensure that all new housing built in the Greater Cambridge area is built to be energy efficient and utilises renewable energy, which, if correctly implemented, should have a positive impact on residents through reducing energy bills, helping to address fuel poverty for residents moving into new homes.</p>	Positive	Low - medium
RELIGION/BELIEF: Identify the potential impact the policy or function on different religious/faith groups.		
There is no evidence that the SPD will have detrimental impacts on people due to religion/belief	Neutral	

SEX: Identify the potential impact of the policy or function on men and women.		
There is no evidence that the SPD will have detrimental impacts on people due to sex.	Neutral	
SEXUAL ORIENTATION: Identify the potential impact of the policy or function on lesbian, gay men, bisexual or heterosexual people.		
There is no evidence that the SPD will have detrimental impacts on people due to sexual orientation.	Neutral	
OTHER CHARACTERISTIC SPECIFIC TO SOUTH CAMBRIDGESHIRE – RURALITY: Identify the potential impact of the policy or function on people who are rurally isolated.		
National data on fuel poverty suggests that fuel poverty is proportionately more prevalent in rural areas, with 14% of households in rural villages, hamlets and isolated dwellings national being defined as fuel poor. Homes in rural areas are typically less energy efficient and can be more reliant on potentially more expensive heating fuels. While levels of fuel poverty in South Cambridgeshire are amongst the lowest in the region, the SPD could have a positive impact for some residents through reducing energy bills, helping to address fuel poverty amongst residents moving into new homes.	Positive	Low - medium

E. ACTION PLAN

You should now be able to identify whether the Council needs to take any action to eliminate discrimination, disadvantage or unfair impact, or to make changes to more effectively promote equality, diversity or good relations. Alternatively, you might have identified that you cannot fully assess the impact of the policy on different groups until you have more information, data or other evidence.

Actions that you might identify at this stage could include:

Changes to the policy itself

Collecting and analysing data not currently available

Consulting further with staff, residents and customers in order to find out more about how the policy or decision will affect people

Undertaking surveys or other research.

Action/change required	Responsibility	Timescale	Resources required	What issue/problem will this action address?
Monitoring Indicators in the South Cambridgeshire Local Plan 2018 will help review the success of the SPD	Greater Cambridge Shared Planning Policy Team	Authority Monitoring Report to be endorsed by Members, usually in December each year.	From within existing resources within the Greater Cambridge Shared Planning Policy Team	

F. RECOMMENDATION

You should now recommend whether the Council should adopt, modify, pilot or reject the policy (please indicate your proposed recommendation from the options below).

Adopt the policy in its originally proposed format (no issues identified)	Yes
Modify the policy to address any negative impact or to better exploit any potential to promote equality, diversity and good relations	
Continue with the policy despite identifying issues (note: justification must be provided)	
Reject the policy entirely, due to the findings of the EqIA	
Pilot the policy and re-evaluate the equality impact after the pilot period	
Modify the policy to meet separate statutory changes, not linked to equality/diversity	
Please briefly set out your reasons for this recommendation. No adverse impacts noted. Any impacts that have been omitted can be raised as part of the public consultation.	

SIGN OFF: The officers below confirm that this full assessment has been completed in accordance with the Council's guidance

Signature of Lead Officer	<i>E Davies</i>	Date: 1 July 2019
Signature of Head of Service or Director	<i>C Hunt</i>	Date: 1 July 2019

Please retain the original form in your service area and return an electronic copy of the completed form to the Policy and Performance Team for publication.