

Equality Impact Analysis Tool: Draft Greening Supplementary Planning Document, January 2021

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	2020 Q4
Name and details of policy, strategy, function, project, activity, or programme	<p>Draft Greening Supplementary Planning Document</p> <p>The Draft Greening Supplementary Planning Document (SPD) covers all facets of planning that can contribute towards reducing carbon emissions and promoting a healthier borough. It includes guidance on our energy policies both for new build and retrofitting the substantial historic stock that we have, guidance on the reduction of toxic emissions and controlling air pollution, urban greening, flooding and biodiversity.</p> <p>The SPD will operate alongside relevant policies of the Local Plan (2019)</p>
Lead Officers	<p>Name: Preeti Gulati Tyagi Position: Planning Policy Team Leader Email: Preeti.GulatiTyagi@rbkc.gov.uk Telephone No: 07739314997</p>
Lead Borough	RBKC
Date of completion of final Full EIA	N/A

Section 02	Scoping of Full EIA
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Plan for completion	<p>Timing: The SPD is due to be adopted in April/May 2021. On adoption it will become material consideration in planning decisions.</p> <p>Resources: The SPD will be prepared within the existing staff and budget resources of the Planning Policy Team.</p>
Analyse the impact of the policy, strategy, function, project, activity, or programme	<p>Analyse the impact of the policy on the protected characteristics (including where people / groups may appear in more than one protected characteristic). You should use this to determine whether the policy will have a positive, neutral or negative impact on equality, giving due regard to relevance and proportionality.</p> <p>This SPD covers all facets of planning that can contribute towards reducing carbon emissions and promoting a healthier borough. It includes guidance on the following points:</p> <p>Circular Economy The SPD supports all developments to use Circular Economy principles with major developments required to demonstrate how this has been considered. “Circular Economy is one where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste. For the built environment this is about prioritising retention and refurbishment over demolition and rebuilding.”</p> <p>Whole Life-Cycle Approach This will require major development to not only consider their carbon footprint when the building is complete and is in operation but at all stages from inception to completion and dismantling. This approach recognises the carbon inherent in materials as well as their transport and manufacturing. Therefore, it will promote local sourcing and procurement. It will also help us reduce construction waste or enable it to be disposed of in a sustainable way.</p> <p>Energy Hierarchy We require the energy hierarchy to inform the design, construction and operation of new buildings. This is a sequential approach with four essential strands: be lean (reduce energy demand), be clean (supply energy efficiently), be green (use renewable energy) and offset carbon, and be seen: monitor the actual performance of building to understand discrepancies between design and implementation.</p> <p>Retrofitting existing buildings A key component of the SPD is to provide guidance to householders about suitable interventions that they can make to upgrade the energy standards of their homes. The principles of the Energy Hierarchy described above are used. The buildings are categorised as one of three - 1. Non-heritage buildings 2. Conservation Area buildings and 3. Listed Buildings. Clear guidance is provided on each of these buildings types for example double glazing is recommended for non-heritage buildings and suitable in conservation areas as long as they are slim line and fit the age and style of building but are unlikely to be acceptable in a listed building.</p>

Air Quality

There is a clear recognition that development proposals need to consider the air quality given that the whole Borough is in an air quality management area. We will require Air Quality Assessments as part of major developments. Amongst other measures to improve air quality we support the provision of electric vehicle charging points. For all new developments where parking is proposed, applicants should seek to provide on-site charging points to accommodate the current and future requirements of the occupants. The SPD also recognises the benefits of retrofitting charging points to existing parking spaces and supports this.

Urban Greening

Green infrastructure provides wide ranging benefits including reducing pollution, climate change and its impacts and supporting a circular economy. To secure some form of greening in all our major developments we use a new approach called the Urban Greening Factor (UGF). This will require both residential and non-residential development to score a prescribed level of UGF. We have over 8,000 street trees in the Borough and will support developments to provide more.

Minimising Flood Risk

The two most prevalent flood risk sources for the Borough are surface water and sewer water. Therefore, new developments should both be protected from flood risk and minimise it. We require an overall reduction in surface water run off so once developed there is an improvement. For the largest schemes we will require Integrated Water Management Strategies at an early stage to consider and address local sewerage capacity issues, so flood risk is not increased.

Biodiversity

We are looking to use the opportunities available in new development to improve biodiversity so there is a net gain. These measures will make a significant contribution in tackling Climate Change and meet the targets we have set ourselves in the Borough. We will continue to monitor the effectiveness of what has been proposed and be fully aware of advancements in technology over time. This will enable us to understand and learn where we can further improve our policies in addressing this challenge.

The SPD does not introduce new policies but explains how to implement the following Local Plan chapters and policies:

An Engaging Public Realm – recognises the benefit of open space is wider than pure aesthetics, it also provides a valuable recreational resource, and contributes to wildlife habitats and biodiversity and has benefits in minimising noise and air pollution.

• **Policy CR5 Parks, Gardens, Open Spaces and Waterways**

- **Policy CR6 Trees and Landscapes**

Renewing the Legacy – seeks to ensure no diminution in the excellence we have inherited, but to pass to the next generation a Borough that is better than today.

- **Policy CL2 Design Quality**

- **Policy CL3 Heritage Assets – Conservation Areas and Historic Spaces**

- **Policy CL4 Heritage Assets – Listed Building, Scheduled Monuments and Archaeology**

Respecting Environmental Limits – The aim of these policies is to mitigate climate change.

- **Policy CE1 Climate Change**

- **Policy CE2 Flooding**

- **Policy CE3 Waste**

- **Policy CE4 Biodiversity**

- **Policy CE5 Air quality**

The SPD is in line with the New London Plan policies, the Council’s Climate Change Declaration and the Air Quality and Climate Change Action Plan 2016 – 2021.

Section 9.4 of the Integrated Impact Assessment (IIA), undertaken to assess the Local Plan policies, explains how equalities groups have been considered and summarises the assessment on equalities of the Local Plan policies. It concludes that the potential effect of the above Local Plan Policies is that they will have a positive effect on equalities. The IIA reports that “*Policy CT2 provides an opportunity to improve public transport access, which again, is generally a positive for equality for those who cannot drive or do not have access to a car for any reason. CE1 can influence equality through the relative cost of utilities, the standard of heating in homes and planning which minimise reliance on the private car. CE2 has the potential to avoid generating inequality or worsening inequality, by ensuring new developments do not pass flood risk onto neighbouring sites or elsewhere. Policies C1 and CR5 can help to ensure that adequate facilities (including open space) and infrastructure are put in place to avoid effects on existing communities – e.g. services not having sufficient capacity*”.

Poor air quality has been associated with a number of health problems and there is an extensive evidence that long-term exposure to common air pollutants contributes to the development of cardiovascular, cancer and respiratory diseases. It affects the health of all Londoners, however certain groups are more likely to be affected than others. People in the lowest socio-economic groups are more likely to be exposed to poor air quality and that exposure is more likely to result in poor health.

Therefore, the policies that the SPD is providing guidance on and the SPD itself have been subject to equalities assessment. An overall appraisal of the positive, negative or neutral impact is set out below.

Protected characteristic	Borough Analysis	Impact: Positive, Negative, Neutral
Age	<p>RBKC</p> <p>The Draft Greening Supplementary Planning Document (SPD) has been written so that new and existing buildings can deliver the best possible standards to reduce harmful carbon emissions. New and existing development will also be better adapted and resilient to climate change and include green infrastructure with multiple benefits. Enhancing green infrastructure and air quality may have a positive effect on this target group. Equally, elderly people who live or work in flood prone areas may be more vulnerable to flooding and the strategy may therefore have a beneficial effect on them by reducing flood risk.</p>	Positive
Disability	<p>RBKC</p> <p>The Draft Greening Supplementary Planning Document (SPD) has been written so that new and existing buildings can deliver the best possible standards to reduce harmful carbon emissions. New and existing development will also be better adapted and resilient to climate change and include green infrastructure with multiple benefits. People with disabilities may be more reliant on private transport but there is no guidance in the SPD to prevent the use of private transport when necessary. People with disabilities who live or work in flood prone areas may be more vulnerable to flooding and the strategy may therefore have a beneficial effect on them by reducing flood risk.</p>	Slight positive
Gender reassignment	<p>RBKC</p> <p>The Draft Greening Supplementary Planning Document (SPD) has been written so that new and existing buildings can deliver the best possible standards to reduce harmful carbon emissions. New and existing development will also be better adapted and resilient to climate change and include green infrastructure with multiple benefits. It will not have direct equality impacts on this target group.</p>	Neutral
Marriage and Civil Partnership	<p>RBKC</p> <p>The Draft Greening Supplementary Planning Document (SPD) has been written so that new and existing buildings can deliver the best possible standards to reduce harmful carbon emissions. New and existing development will also be better adapted and resilient to climate change and include green infrastructure with multiple benefits. It will not have direct equality impacts on this target group.</p>	Neutral

Pregnancy and maternity	RBKC The Draft Greening Supplementary Planning Document (SPD) has been written so that new and existing buildings can deliver the best possible standards to reduce harmful carbon emissions. New and existing development will also be better adapted and resilient to climate change and include green infrastructure with multiple benefits. Pregnant women and those who are on maternity leave and live or work in flood prone areas may be more vulnerable to flooding and the strategy may therefore have a beneficial effect on them by reducing flood risk.	Positive
Race	RBKC The Draft Greening Supplementary Planning Document (SPD) has been written so that new and existing buildings can deliver the best possible standards to reduce harmful carbon emissions. New and existing development will also be better adapted and resilient to climate change and include green infrastructure with multiple benefits. It will not have direct equality impacts on this target group.	Neutral
Religion/belief (including non-belief)	RBKC The Draft Greening Supplementary Planning Document (SPD) has been written so that new and existing buildings can deliver the best possible standards to reduce harmful carbon emissions. New and existing development will also be better adapted and resilient to climate change and include green infrastructure with multiple benefits. It will not have direct equality impacts on this target group.	Neutral
Sex	RBKC The Draft Greening Supplementary Planning Document (SPD) has been written so that new and existing buildings can deliver the best possible standards to reduce harmful carbon emissions. New and existing development will also be better adapted and resilient to climate change and include green infrastructure with multiple benefits. It will not have direct equality impacts on this target group.	Neutral
Sexual Orientation	RBKC The Draft Greening Supplementary Planning Document (SPD) has been written so that new and existing buildings can deliver the best possible standards to reduce harmful carbon emissions. New and existing development will also be better adapted and resilient to climate change and include green infrastructure with multiple benefits. It will not have direct equality impacts on this target group.	Neutral

Human Rights or Children’s Rights

If your decision has the potential to affect Human Rights or Children’s Rights, please contact your Borough Lead for advice

	N/A
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Section 03	Analysis of relevant data
	Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands.
Documents and data reviewed	National planning Policy Framework, Planning Practice Guidance, Planning for the Future White Paper (August 2020), Building Regulations, The Ten Point Plan for a Green Industrial Revolution (2020), Publication London Plan (2020), RBKC Local Plan (2019).
New research	If new research is required, please complete this section
	N/A

Section 04	Consultation
	The Council published a draft of the SPD for a six-week consultation from 12 January to 23 February 2021.

Section 05	Analysis of impact and outcomes
Analysis	N/A

Section 06	Reducing any adverse impacts and recommendations
Outcome of Analysis	Include any specific actions you have identified that will remove or mitigate the risk of adverse impacts and / or unlawful discrimination. This should provide the outcome for each borough, and the overall outcome.
	N/A

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Section 07	Action Plan					
Action Plan	Note: You will only need to use this section if you have identified actions as a result of your analysis					
	Issue identified	Action (s) to be taken	When	Lead officer and borough	Expected outcome	Date added to business/service plan
	N/A					

Section 08	
Chief Officers' sign-off	Name: Amanda Reid Position: Director, Planning and Place Email: amanda.reid@rbkc.gov.uk Telephone No: 07790363868
Key Decision Report (if relevant)	
Lead Equality Manager (where involved)	Name: Angela Chaudhry Position: Corporate Equality and Diversity Lead Date advice / guidance given: Email: angela.chaudhry@rbkc.gov.uk Telephone No: 07739 314 257

Please ensure that a final version of your EqIA is sent to the Equalities Officer, Angela Chaudhry, so that it can be published on our intranet