

## Equality Impact Assessment / Equality Analysis

(updated May 2021)

<b>Title of service or policy</b>	Energy Efficiency, Retrofitting and Sustainable Construction Supplementary Planning Document (SPD)
<b>Name of directorate and service</b>	Planning Policy
<b>Name and role of officers completing the EIA</b>	Alex McCann – Climate Policy (Planning) Officer
<b>Date of assessment</b>	29/12/2021

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.

<b>1.</b>	<b>Identify the aims of the policy or service and how it is implemented.</b>	
	<b>Key questions</b>	<b>Answers / Notes</b>
<b>1.1</b>	<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 final Supplementary Planning Document (SPD) to provide further guidance on both adopted policies in the Core Strategy/Placemaking Plan and the emerging policies in the LPPU on retrofitting, sustainable construction and renewable energy. This will help to ensure we deliver sustainable development to meet the needs of the local people.</p> <p>The final SPD document sets out how changes and adaptations can be made in response to Climate Change whilst also having regard to statutory legislation. The intended outcome of the SPD is to better align with, and help to deliver, the core aims of B&amp;NES’ Climate Emergency resolution by providing practical guidance for homeowners and occupiers, in addition to landlords and business owners, on how to improve the energy efficiency of buildings.</p> <p>The responsibility of its implementation is shared between Planning Policy, Development Management, and the Conservation, Sustainability, Housing Standards, and Website Teams.</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 new SPD is an updated and combined version of the original Sustainable Construction &amp; Retrofitting SPD and the Energy Efficiency &amp; Renewable Energy in Historic Buildings SPD.</p> <p>The guidance is not a national requirement; instead, the SPD is intended to provide practical guidance to help deliver the objectives of B&amp;NES's Local Plan Policy relating to sustainable construction, retrofitting and renewable energy. The policy guidance in the SPD seeks to respond to B&amp;NES's Climate Emergency Declaration.</p> <p>In terms of the scope, we have reviewed and updated 7 key areas. In summary, these are:</p> <ol style="list-style-type: none"> <li>1. Combining the original SPDs</li> <li>2. Creating a website format in addition to the PDF version</li> <li>3. Updating the presentation (photos, illustrations and format)</li> <li>4. Updating the wording</li> <li>5. Updating the technological information</li> <li>6. Updating the policy (national and local)</li> <li>7. Adding a new section on Fuel poverty/affordable warmth</li> </ol>
<p><b>1.3</b></p>	<p>Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>The aims of retrofitting will link to many Council services and policies, all of whom we are liaising with:</p> <ul style="list-style-type: none"> <li>● The main 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. This document emphasises the need to enable our district to move to a low carbon future. Since homes in the district are responsible for the largest portion of carbon dioxide, retrofitting is a key priority for achieving this aim. The SPD will help B&amp;NES reach its goal of achieving 65,000 home retrofits and net zero carbon across all new development by 2030.</li> <li>● Housing Services work on affordable warmth which builds on</li> </ul>

		<p>existing fuel poverty work: the new SPD will feature a new chapter on affordable warmth to address this issue, with a particular focus on achieving this in historic buildings</p> <ul style="list-style-type: none"> <li>• Public Health, the Health &amp; Wellbeing Board and the Health &amp; Wellbeing Strategy: This work builds on Public Health’s fuel poverty work. This is a big issue in B&amp;NES as currently there are a large number of avoidable deaths, and costs associated with this for the NHS, due to ill-health caused by cold homes, particularly for those living within B&amp;NES’ historic building stock (this is an issue which disproportionately affects elderly people). This SPD aims to address this by providing practical guidance on how to retrofit all building types, particularly within the new affordable warmth chapter.</li> <li>• The Website Team are creating a web-format for the SPD which will be available in addition to the PDF version of the document. The website version will be compatible with tablets, mobile devices, laptops and computers and will work well with screen readers and magnifiers. It is intended that this will make the information in the SPD more user-friendly and accessible.</li> <li>• Economic Development and the Economic Strategy: Retrofitting could generate extra work within the district, which could be done by local businesses. It has been identified that there is a skills shortage for implementing retrofitting measures within B&amp;NES. Bath College at Norton Radstock Campus are looking into how to address this locally e.g. offering new apprenticeships.</li> <li>• Planning and Building Control: Promotion of retrofitting could cause an increase in certain measures that require planning, building control and listed building consent. Retrofitting is supported in the Core Strategy and in the LPPU’s emerging policies CP1, CP2 and CP3 in the LPPU which promote sustainable construction, retrofitting and renewable energy.</li> </ul> <p>Given that the production of the SPD has been a collaborative process</p>
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		<p>between a number of teams within the Council, in addition to local external consultants who are specialists in the areas of sustainability and heritage conservation, there are now no conflicts between retrofitting and other Council policies since a good deal of work has previously taken place to address former conflicts. The SPD is intended to resolve the tension between conservation of our historic buildings and energy efficiency by setting out how people can implement energy efficiency and renewable energy measures in a way which complies with legislation. Challenges for historic/listed buildings gaining approval for retrofitting may still occur, due to potential historic asset damages from retrofitting installations. However, the SPD sets out guidance that aims to maximise the likelihood of historic buildings gaining approval for retrofitting, by providing information on how to limit the amount of historic harm and increase associated energy efficiency benefits.</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>		
	<p><b>Key questions</b></p>	<p><b>Data, research and information that you can refer to</b></p>

2.1	What equalities training have staff received to enable them to understand the needs of our diverse community?	At the Steering Group, and the Parish and Councillor Webinars, both the Council staff and Members have received equality training through the Corporate Induction process. Other members from some partner organisations, such as Bath Preservation Trust and Donald Insall Associates, have also received equality training, either through their organisation or from management training.
2.2	What is the equalities profile of service users?	For retrofit delivery, there will be a focus on vulnerable people and those living in need of affordable warmth or on lower incomes, to address the pressure of rising energy costs. However, we wish to encourage uptake amongst all sectors of the population.
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?	None Identified.
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	<p>As part of the revised SPD process, we have held a number of stakeholder engagement sessions in order to gather stakeholder views on associated issues. These sessions consisted of: one well-facilitated stakeholder workshop with a briefing, focus group discussions and a plenary discussion; and two webinars which followed a briefing and Q&amp;A format. The aims of these sessions were:</p> <ul style="list-style-type: none"> <li>• To bring stakeholders together to share and understand different perspectives related to Sustainable Construction and Retrofitting;</li> <li>• To investigate issues with retrofitting in B&amp;NES and how the revised SPD may address this;</li> <li>• To share examples of the emerging content and receive feedback;</li> <li>• To discuss how the current SPDs might be combined and</li> </ul>

		<p>updated to create a more user friendly document.</p> <p>A wide range of stakeholders were represented at the workshops, including:</p> <ul style="list-style-type: none"><li>• Ward Councillors from across Bath</li><li>• Councillors on the Planning Committee, B&amp;NES Council</li><li>• Development Management Officers, B&amp;NES Council</li><li>• Housing Officers, B&amp;NES Council</li><li>• Sustainability Officers, B&amp;NES Council</li><li>• Conservation Officers, B&amp;NES Council</li><li>• Historic England</li><li>• Bath Preservation Trust</li><li>• The University of Bath</li><li>• Bath Spa University</li><li>• Bath College</li><li>• Local Resident Associations</li><li>• A number of other stakeholders and stakeholder groups who have knowledge in the fields of heritage conservation and/or sustainable construction and retrofitting.</li></ul> <p>In summary, the key points of feedback to emerge from these</p>
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		<p>sessions included:</p> <ul style="list-style-type: none"> <li>• Positive support for the idea to combine the original SPDs, include more case studies and illustration, and create a new web-based format;</li> <li>• A concern about the cost of the retrofitting as a key barrier to implementation;</li> <li>• General support for the proposed contents plan for the revised SPD;</li> <li>• An expressed need for more alignment across Planning teams with more prioritisation of the climate emergency declaration within Planning decisions in relation to retrofitting proposals.</li> </ul> <p>A full 6-week statutory consultation period was carried out, for the population of B&amp;NES to provide their views on the draft SPD, alongside sustainability and heritage professionals. The opinions and views received through this consultation have been used to make improvements to the final SPD. The primary points raised were:</p> <ul style="list-style-type: none"> <li>• Support that the SPD will assist people to retrofit their homes and sustainably construct new developments</li> <li>• Concerns that there are barriers preventing retrofitting historic/heritage households and buildings</li> <li>• Requests for further guidance and information on energy efficiency improving measures</li> <li>• Ensure that the awareness, education and access of the</li> </ul>
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		SPD is maximised <ul style="list-style-type: none"> <li>Concerns that there are not enough financial grant schemes available to householders for retrofitting</li> </ul>	
<b>2.6</b>	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	No further consultation required.	
<b>3. Assessment of impact: 'Equality analysis'</b>			
	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>
<b>3.1</b>	<b>Issues relating to all groups and protected characteristics</b>	<ul style="list-style-type: none"> <li>The SPD covers a technical and complex subject matter and certain groups may not understand what relevance the SPD has to them and therefore they do not become involved in the process.</li> <li>The cost of retrofitting is seen as a barrier.</li> <li>Most retrofitting and sustainable construction measures require planning consent; this costs money, it can be time-consuming, and some people may find the</li> </ul>	A proportion of people may not engage with the information in the SPD if the technical guidance isn't explained in a way which is easy to understand. The revised SPD seeks to address this by creating a more user-friendly, practical and visual guidance. One way this will be achieved is through the creation of the new web-format of the SPD which will be available in addition to the PDF version of the document. The web version of the SPD will work well on all devices, including mobiles and tablets, meaning this information can be referred to even when

		<p>planning application process difficult to navigate.</p> <ul style="list-style-type: none"> <li>- Fuel poverty/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 adequate home heating and are a great risk from the associated health and quality of life impacts of a cold home. Existing physical health conditions can be made worse, there is a significant potential for deteriorating mental health and lower overall wellbeing, in addition to other effects such as social isolation and lower educational attainment.</li> <li>- Many affected households in B&amp;NES include dependent children, the elderly, or people with long-term disabilities or illnesses.</li> <li>- Depending on your building/house type and location, it may be more complex, costly or time-consuming to retrofit your home with certain energy efficiency or renewable energy measures.</li> <li>- Certain groups may not be able to access information and consultations as easily as others i.e. disabled people, those who do not have English as their first language, young people, those</li> </ul>	<p>outside the home. It will also work well with screen readers and magnifiers, and will have built in links to both other sections of the SPD as well as further external guidance. Another way this will be achieved is by introducing new illustrations and/or photos on every page. The new illustrations follow a consistent style which is clear, simple, includes labels for further information, and uses a colour palette which complies with the Council's accessibility guidance for visual imagery. The wording in the final SPD has also been reviewed and updated to ensure that the technical information is pitched at the right level for a wide range of readers.</p> <p>The final SPD will include a 'Quick Wins' checklist which will provide suggestions for cheap or free energy and water saving strategies people can implement, without the need for planning consents or professional installation/consultation. This will be of great benefit for those who are unable to implement renewable energy/energy efficiency measures due to cost or time constraints.</p> <p>Due to the COVID-19 pandemic, stakeholder engagement sessions have taken place online, which means that certain groups who do not have the necessary technical skills, or do not have access to the internet for other reasons (e.g. financial or time issues), may not be able to share their views or attend the</p>
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		<p>who support vulnerable people, older people and those with limiting illnesses.</p> <ul style="list-style-type: none"> <li>- Certain groups may not feel comfortable expressing their views in public due to fear of discrimination such as people from the LGBT community, faith groups, young people and the BME community.</li> </ul>	<p>engagement sessions. We sought to overcome this issue by engaging with a large number of people and groups from a range of backgrounds who represent a range of groups which varying characteristics. Additionally, by holding the sessions online, some stakeholders may have found it easier to attend the SPD engagement sessions compared to if they required in-person attendance e.g. due to not having to take as much time out of work to travel, not having to pay for the cost of travel, some groups may feel more comfortable attending an online session and expressing their views.</p> <p>A new chapter will be included on affordable warmth, with a particular focus on addressing this issue within historic buildings. This section will empower the reader with the knowledge about the issue within B&amp;NES, their rights, as well as the various legislative processes, schemes and strategies currently available in order to enable affordable warmth. Local case studies are being used here to simply and clearly communicate how sustainable retrofitting measures have been successfully implemented in homes with complex planning constraints to achieve affordable warmth. This section is particularly useful for elderly people and for people who</p>
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			live in traditionally-constructed buildings.
3.2	<b>Sex</b> – identify the impact/potential impact of the policy on women and men.	The proposals in the revised 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
3.3	<b>Pregnancy and maternity</b>	The proposals in the revised 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
3.4	<b>Gender reassignment</b> – identify the impact/potential impact of the policy on transgender people	The proposals in the revised 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)	<p>The SPD covers a technical and complex subject matter and certain groups may not understand the information related to energy efficiency, renewable energy, retrofitting 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.</p> <p>Some retrofitting measures take up a large amount of space inside or outside buildings, which may cause potential</p>	<p>A new web-format of the SPD which will be available in addition to the PDF version of the document. This will make the information in the SPD more accessible to people with sensory disabilities as the web-version will be compatible on all devices, including mobiles and tablets, and it will also work well with screen readers and magnifiers. This means that people will be able to alter the size of text or images to make them easier to see.</p> <p>A new set of illustrations have been created for the SPD which use clear imagery and an</p>

		<p>issues in terms of accessibility for disabled people if this issue is not carefully considered in the initial design. Certain retrofitting measures will have to be adapted to suit the needs of disabled people e.g. ensuring that retrofitted windows are designed in a way so that they can be easily reached and opened/closed by the building occupant.</p> <p>Many households in B&amp;NES affected by fuel poverty/issues with affordable warmth include people with long-term disabilities or illnesses. Existing physical health conditions can be made worse, there is a significant potential for deteriorating mental health and lower overall wellbeing, in addition to other effects such as social isolation and lower educational attainment. The Council's Housing Standards team is working to address this issue. Some current affordable warmth schemes available across B&amp;NES include: B&amp;NES Green affordable warmth grant; West of England LAD 2 grant; B&amp;NES Low cost energy loan from Lendology; and Flexible ECO grants through government approved contractors.</p>	<p>accessible colour palette, in addition to labels, to make the guidance more user-friendly and to help explain the potentially complex technical ideas in the text.</p> <p>The wording in the revised SPD has been reviewed and updated to ensure that the technical information is pitched at the right level for a wide range of readers.</p> <p>The SPD provides a wide range of energy efficiency and renewable energy options, with guidance which explains the various ways they may be implemented. This gives people a large number of options, making it more that people will be able to find one which is suitable for them and not disruptive to their needs or home.</p> <p>The SPD includes a new section on Affordable Warmth which will empower the reader with the knowledge about fuel poverty, their rights, as well as the various grants, schemes and strategies available within B&amp;NES that will help them achieve affordable warmth. Local case studies are also being included which show recent examples of how affordable warmth was achieved in B&amp;NES within historic buildings despite numerous complex planning constraints. Some current affordable warmth schemes detailed in the SPD include: B&amp;NES Green affordable</p>
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			<p>warmth grant; West of England LAD 2 grant; B&amp;NES Low cost energy loan from Lendology; and Flexible ECO grants through government approved contractors.</p> <p>The completion of planning applications and licence applications forms can be difficult for those with certain disabilities. The technical information in the SPD whilst set out a clearly and visually as possible may also be difficult for those with certain disabilities.</p>
3.6	<p><b>Age</b> – identify the impact/potential impact of the policy on different age groups</p>	<p>Elderly and very young residents in fuel poverty are at particular risk from cold homes. For the elderly and vulnerable, there is a direct link between fuel poverty and excess winter deaths. Excess winter deaths due to cold homes is a problem which impacts a significantly larger proportion of the population in B&amp;NES compared to other areas of the Country. The Council’s Housing Services team are working to address issue.</p> <p>Taking better care of our natural environment and resources will also help ensure a good quality of life for future generations. The guidance will help combat climate change, which is likely to impact more on the elderly or very young as a result of increased air pollution and extreme weather.</p>	<p>The final SPD includes a new section on Affordable Warmth which will empower the reader with the knowledge about fuel poverty, their rights, as well as the various grants, schemes and strategies available within B&amp;NES that will help them achieve affordable warmth. Local case studies are also being included which show recent examples of how affordable warmth was achieved in B&amp;NES within historic buildings despite numerous complex planning constraints. Some current affordable warmth schemes detailed in the SPD include: B&amp;NES Green affordable warmth grant; West of England LAD 2 grant; B&amp;NES Low cost energy loan from Lendology; and Flexible ECO grants through government approved contractors.</p> <p>It was identified during the stakeholder</p>

		Young people are more likely to live in HMOs or rented accommodation. Landlords may not feel incentivised to retrofit buildings they own due to perceived cost, complexity and/or time barriers.	engagement sessions that there is a shortage of skills in the field of retrofitting within B&NES. Bath College is exploring ways to address this skills shortage by perhaps creating new apprenticeships for young people in this area.
<b>3.7</b>	<b>Race</b> – identify the impact/potential impact on across different ethnic groups	As in 3.1 above	None identified
<b>3.8</b>	<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
<b>3.9</b>	<b>Marriage and civil partnership</b> – does the policy/strategy treat married and civil partnered people equally?	The proposals in the final SPD are very unlikely to impact people differently whether or not they are in a marriage or civil partnership. However, should someone consider that this is in fact the case we will consider the points made.	None Identified.
<b>3.10</b>	<b>Religion/belief</b> – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	As in 3.1 above	None Identified
<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,	The Council’s existing Fuel Poverty and insulation programmes have put a lot of successful effort into reaching vulnerable and low-income residents, providing grant schemes that allow people to retrofit their home to improve energy efficiency and	In the Stakeholder Engagement sessions, it was revealed in feedback that one of the biggest perceived barriers to retrofitting is the cost.  The final SPD includes a new section on

	<p>neighbourhood, employment status can influence life chances <b>(this is not a legal requirement, but is a local priority).</b></p>	<p>achieve affordable warmth.</p>	<p>Affordable Warmth which will empower the reader with the knowledge about fuel poverty, their rights, as well as the various grants, schemes and strategies available within B&amp;NES that will help them achieve affordable warmth. Local case studies are also being included which show recent examples of how affordable warmth was achieved in B&amp;NES within historic buildings despite numerous complex planning constraints. Some current affordable warmth schemes detailed in the SPD include: B&amp;NES Green affordable warmth grant; West of England LAD 2 grant; B&amp;NES Low cost energy loan from Lendology; and Flexible ECO grants through government approved contractors.</p> <p>We have included information on approximately how long it could take for you to see a financial return on your initial upfront cost of retrofitting your home; often the energy saving cost from retrofitting will in the longer term be much greater than the initial cost of the measure.</p>
<p><b>3.12</b></p>	<p><b>Rural communities*</b> identify the impact / potential impact on people living in rural communities</p>	<p>Rural communities may not be on the gas network and, as such, have higher fuel bills and could benefit substantially from retrofit. Rural buildings are more likely to be of a traditional-construction, without modern window glazing or insulation, making fuel costs significantly higher for the occupier. Traditionally-constructed</p>	<p>To help ensure that rural communities benefit fully, we have engaged with Parish Councillors in a stakeholder webinar to ensure that the view of their communities are shared and considered.</p> <p>During the stakeholder engagement sessions,</p>



		<p>buildings, such as those with thatched roofs for example, may also be more difficult to retrofit, which could make them more costly to retrofit and any planning processes more complex to navigate.</p> <p>The low income and low home energy efficiency rating means these households are less likely to be able to afford the cost of adequate home heating and are a great risk from the associated health and quality of life impacts of a cold home.</p>	<p>people shared experiences of having difficulties trying to retrofit agricultural buildings due to their traditional construction which limited the number of appropriate sustainable retrofitting measures they could implement and made the planning approval process more complex. The final SPD uses case studies to show the reader how homes can be retrofitted despite complex planning constraints (e.g. in traditionally-constructed buildings).</p> <p>B&amp;NES aims to tackle the situation of fuel poverty through assisting households achieve energy efficiency and low-cost low carbon heating improvements. Our aim is that all households in the district achieve affordable warmth and that the Government target of achieving energy efficiency rating band C wherever reasonably practical is met. The final SPD includes a new chapter on Affordable Warmth which will explain, with local case study examples, the current schemes and grants available to people so that they can retrofit their home. Some current affordable warmth schemes detailed in the SPD include: B&amp;NES Green affordable warmth grant; West of England LAD 2 grant; B&amp;NES Low cost energy loan from Lendology; and Flexible ECO grants through government approved contractors.</p> <p>The revised final SPD includes guidance on</p>
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			implementing energy saving measures in all building types, including advice relevant to rural buildings and buildings of a traditional construction.
<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):

Issues identified	Actions required	Progress milestones	Officer responsible	By when
Retrofitting of energy efficiency/renewable energy interventions potentially difficult to implement for people who struggle with fuel poverty issues.	Trial implementing retrofitting measures in homes using available grant/schemes in B&NES in order to retrofit cheaply and achieve affordable warmth. Document these examples as case studies in the SPD.	Case studies are granted all relevant planning consents and planning process milestones are complete.  Document details of the case studies in the new SPD and associated webpage.	Housing and Planning Policy Teams	Before the final formatted version of the SPD is complete (mid-end of July 2021)
Potential local skills shortage of qualified professionals who are able to implement/provide advice on the various energy efficiency and renewable energy measures detailed in the SPD.	Engage with Bath College, other educational establishments and local businesses to explore the possibility of creating more opportunities for young people to gain skills relevant to the field of sustainable construction and retrofitting.	Research into the number and breadth of skilled professionals available locally.  Potentially set up working group and meetings to create strategy to address this issue. Monitor progress and work collaboratively as needed with relevant external organisations.	Sustainability and Planning Policy Teams	As required

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 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 adopted in January/February 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.	There will be a 7-week consultation period in order to account for it being over the Summer holiday period in August when many people may be away.  Consultation will take place online using Citizenspace and through Webinars. There is also the potential to have in-person engagement events and hard-copies of the SPD draft available – Covid regulations permitting.	Communications and Planning Policy Team	July/August/September 2021

Actions relating to the final SPD:

Issues identified	Actions required	Progress milestones	Officer responsible	By when
Concerns around accessibility and awareness	Ensure that the adoption and launch of the SPD is	The updates to the web version of the SPD will be	Planning Policy, Web Team and	January/February 2022 i.e. during and after the

of the SPD	<p>sufficiently publicised and distributed to the B&amp;NES population.</p> <p>Ensure that the web version of the SPD is easy to navigate and find information.</p>	<p>carried out following the adoption of the PDF version. Considerable time will be put in to making the web version as accessible and navigable as possible.</p>	Sustainability	adoption/distribution of the final SPD
Concerns around education on how to implement the guidance set out in the SPD	<p>Develop and hold workshops involving key stakeholders and retrofitting experts, to assist householders with information on how they can best implement what is set out in the SPD.</p>	<p>Work on developing these workshops will begin following the adoption of the SPD in February.</p>	Planning Policy, Sustainability and Housing	Continuous following SPD adoption
Concerns that there are not enough financial grant schemes available to householders for retrofitting	<p>Ensure that all available grant schemes are provided on the wider SPD webpage, which can be continuously updated as new schemes are developed. Also ensure that information of these schemes is sufficiently distributed to the B&amp;NES population.</p>	<p>Reliant on when West of England or National scale schemes are set out.</p>	Sustainability and Planning Policy	Ensure wider webpage is available by March 2022. Continuous updates following this.

## 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:** Richard Daone, Deputy Head of Planning (Policy)  
(Divisional Director or nominated senior officer)

**Date:** 05/01/22