

Service area	Planning
Date of assessment	01/10/2025
Name of policy/service to be assessed	Environmentally Sustainable Design and Construction Technical Advice Note (TAN)
Is this a new or existing policy/service?	New guidance
Name of manager responsible for new or amended policy/service	Clara Kerr
Names of people conducting the assessment	Matthew Paul
Step 1 – Description of new or amended policy/service	
Describe the aims; objectives and purpose of the new or amended policy/service (include how it fits in to wider aims or strategic objectives).	The TAN provides guidance to applicants, developers, businesses, and communities to support the Council's Climate Strategy, Local Plan, and Corporate Plan. It sets out practical measures for reducing carbon emissions, addressing biodiversity loss, improving building performance, and preparing for climate resilience.

The Equality Act 2010 requires the Council to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations, the Council also needs to demonstrate its compliance with the Equality Duty. The Council therefore needs to understand how its decisions and activities impact on different people. An Equality Impact Assessment is the current method by which the Council can assess and keep a record of the impact of new or amended strategies, policies, functions or services.

The council retains these duties even when outsourcing services or providing shared services.

Definition of Adverse Impact - occurs when a decision, practice, or Policy has a disproportionately negative effect on a protected group. Adverse Impact may be unintentional.



Are there any (existing) equality objectives of the new/amended policy/service	<ul> <li>To ensure new and existing homes and businesses are affordable to run (reducing fuel poverty).</li> <li>To improve health outcomes by addressing overheating, damp, and air quality (benefiting vulnerable groups).</li> <li>To ensure guidance is inclusive and accessible to all developers, households, businesses and community groups.</li> </ul>
Who is intended to benefit from the new/amended policy/service and in what way?	<ul> <li>Residents: Lower running costs, healthier homes, better air quality, reduced risk from overheating and flooding.</li> <li>Vulnerable groups: Those on low incomes (fuel poverty), older adults, disabled people, children, pregnant women (improved air quality, thermal comfort).</li> <li>Wider community: Businesses gain opportunities in the green economy; nature recovery improves access to green space and wellbeing.</li> </ul>
What are the intended outcomes of this new/amended policy/service?	<ul> <li>Net zero carbon ready development.</li> <li>Healthier, more resilient homes, buildings and places.</li> <li>Lower utility costs, supporting financial resilience.</li> <li>Inclusive design standards that consider accessibility, health, and wellbeing.</li> </ul>
Step 2 – Data	
What baseline <b>quantitative data (statistics)</b> do you have about the function relating to equalities groups (e.g. monitoring data on proportions of service users compared to proportions in the population), relevant to this new/amended policy/service? <u>Huntingdonshire Statistics</u>	We have the following baseline quantitative data relevant to equalities in Huntingdonshire, which help to identify which groups may be more affected by sustainable design / energy performance interventions:



	<ul> <li>Population estimate is ~186,070 (mid-2023). Huntingdonshire.gov.uk         The district grew by ~6.7% between 2011 and 2021. Office for National         Statistics</li> <li>Ethnic minority population is relatively small: ~7.6% non-White (2021)         compared to ~92.4% White. Cambridgeshire Insight+1</li> <li>Fuel poverty affects ~10.95% of households (2020 data). Para 4.30         Sustainability Appraisal Scoping Report</li> <li>In some areas within Huntingdonshire (e.g. Stukeley Meadows and north of St Ives) fuel poverty is much lower (~4.2 %) in contrast to district average, indicating inequality within the district. Para 4.30         Sustainability Appraisal Scoping Report</li> <li>Key health conditions relevant to housing quality: hypertension (15.3 %), depression (13.0 %), asthma (7.2 %) in the local population.         Cambridgeshire Insight</li> <li>These data provide a "baseline" picture: e.g. with ~11% households in fuel poverty, interventions affecting energy efficiency will have material impacts, especially for lower income groups. The health data also indicates there is a local population with conditions that may be exacerbated by poor indoor environment (cold, damp, poor air quality).</li> </ul>
What <b>qualitative data (opinions etc)</b> do you have on different groups (e.g. comments from previous consumer satisfaction surveys/consultation, feedback exercises, or evidence from other authorities undertaking similar work), relevant to this new/amended policy/service?	Feedback from local consultation exercises (e.g. the Huntingdonshire Climate Strategy 2023 engagement, Local Plan 2024 engagement, and previous planning policy consultations) has highlighted:  • Public support for measures that reduce energy bills, tackle fuel poverty, and promote healthier homes, particularly from lower income and older residents.  • Concerns about the affordability and practicality of implementing new technologies (e.g. heat pumps, EV charging), especially for small developers and residents in rural areas.



• Interest from community groups in biodiversity enhancements, sustainable travel, and access to green spaces.

Evidence from other local authorities (e.g. Greater London Authority, Cambridge City Council, Bristol City Council) indicates that sustainable design guidance tends to bring positive impacts for vulnerable groups when linked to affordability, health, and inclusive design, but risks exist around digital exclusion and the accessibility of technical information.

Professional engagement with developers, housing associations and internal council teams (Planning, Housing, Environmental Health) suggests there is broad recognition of the benefits of sustainable design, but also the need for clarity, practical examples, and user-friendly guidance to ensure it is applied consistently across different development scales.

The <u>Consultation and Engagement Strategy Accessibility Guidance</u> may be helpful when thinking about the potential impact of a policy/service on people with different protected characteristics.

**Age** – this refers to the protected characteristic of age. A person belonging to a particular age (for example 32-year olds) or range of ages (for example 18 to 30-year olds).

Are there concerns that the new policy/service could have a differential impact on individuals with this protected characteristic?

Are there any concerns that the policy/service amendments could have differential impact on individuals with this protected characteristic?

For some services this should include consideration of impact in terms of safeguarding young people.

*Impact*: Positive – younger and older residents benefit from improved indoor comfort, reduced energy bills, and better air quality. Safeguards for children (air quality, safe streets) and older people (thermal comfort, resilience to heatwaves).

*Evidence*: TAN emphasises overheating, air quality, water scarcity, and resilience



What evidence do you have for your answer?	
Disability – this refers the protected characteristic of disability. A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.  Are there concerns that the new policy/service could have a differential impact on individuals with this protected characteristic.  Are there any concerns that the policy/service amendments could have differential impact on individuals with this protected characteristic?  What evidence do you have for your answer?	Impact: Positive – improved accessibility through M4(2)/M4(3) standards, better ventilation, reduced damp/mould. Risk that some technologies (heat pumps, MVHR) require user understanding and maintenance which may disadvantage some disabled residents. Photovoltaic panels, used alongside battery storage can enhance resilience in the event of a power cut by providing a backup source of electricity to users of the building. This can be particularly important for disabled occupants who may rely on electrically powered medical equipment, mobility aids, or other essential devices. Ensuring continuity of power can help maintain safety, comfort, and independence during outages.  Mitigation: Ensure guidance highlights the need for simple controls, accessible design, and clear user information.
<b>Gender reassignment</b> – gender reassignment discrimination occurs when a person is treated differently because they are trans*.	Impact: Neutral – no direct differential impact. Benefits of healthier homes and safer public spaces apply equally.
Are there concerns that the new policy/service could have a differential impact on individuals with this protected characteristic.	
Are there any concerns that the policy/service amendments could have differential impact on individuals with this protected characteristic? What evidence do you have for your answer?  *although the term gender reassignment and transsexual is in the Equality Act 2010, it is accepted that the preferred term is trans.	



Marriage and civil partnership in the workplace; this refers the protected characteristic of marriage and civil partnership which is a union between a man and a woman or between a same-sex couple. Civil partnership is between partners of the same sex. Discrimination is when a person is treated differently at work because a person is married or in a civil partnership.  Are there concerns that the new policy/service could have a differential impact on individuals with this protected characteristic.  Are there any concerns that the policy/service amendments could have differential impact on individuals with this protected characteristic?  What evidence do you have for your answer?	Impact: Neutral – no differential impact identified.
Are there concerns that the function could have a differential impact in terms of <b>pregnancy and maternity</b> in the workplace (e.g. pregnant or breast-feeding women). Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.  Are there concerns that the new policy/service could have a differential impact on individuals with this protected characteristic.  Are there any concerns that the policy/service amendments could have differential impact on individuals with this protected characteristic?	Impact: Positive – improved air quality, reduced risk of overheating, better access to green space all support maternal and infant health.



What evidence do you have for your answer?	
Race – this refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. Gypsy/Travellers are distinct group within this category  Are there concerns that the new policy/service could have a differential impact on individuals with this protected characteristic.  Are there any concerns that the policy/service amendments could have differential impact on individuals with this protected characteristic?  What evidence do you have for your answer?	Impact: Positive – cleaner air, more resilient housing, reduced fuel poverty. Some communities may face barriers in accessing grants/retrofit advice.  Mitigation: Ensure engagement and guidance material is accessible via the HDC website, and the document written in plain English.
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<b>Religion and Belief</b> in the workplace - refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief and includes a lack of belief.	Impact: Neutral – no direct impact, though access to green infrastructure and improved public realm benefits all communities.
Are there concerns that the new policy/service could have a differential impact on individuals with this protected characteristic.	
Are there any concerns that the policy/service amendments could have differential impact on individuals with this protected characteristic?	
What evidence do you have for your answer?	



Sex - this refers to the protected characteristic of sex which can mean either male or female, or a group of people like men or boys, or women or girls.  Are there concerns that the new policy/service could have a differential impact on individuals with this protected characteristic.  Are there any concerns that the policy/service amendments could have differential impact on individuals with this protected characteristic?  What evidence do you have for your answer?	Impact: Neutral to positive – evidence suggests women are more likely to experience fuel poverty (due to caring roles, single-parent households). TAN indirectly supports gender equality by lowering running costs and improving housing quality.
<b>Sexual orientation</b> – this relates to whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.	Impact: Neutral – no differential impact identified.
Are there concerns that the new policy/service could have a differential impact on individuals with this protected characteristic.	
Are there any concerns that the policy/service amendments could have differential impact on individuals with this protected characteristic?	
What evidence do you have for your answer?	
Are there concerns that the function could have a differential impact on part time/full time employees? What evidence do you have for your answer?	Impact: Neutral – no direct impact.
Are there concerns that the function could have a differential impact in terms of specific characteristics of Huntingdonshire e.g. <b>Rural</b> isolation	Impact: Positive – supports resilience of rural housing (water stress, overheating, EV charging infrastructure).



#### **Findings**

- The TAN has predominantly positive equalities impacts, particularly on age, disability, pregnancy/maternity, and socioeconomic inclusion.
- The main risk relates to accessibility of information and usability of technology (disadvantaging disabled or digitally excluded groups).
- No evidence of negative or discriminatory intent in the guidance.

#### Recommendations

- Ensure all TAN guidance and supporting material is available in accessible formats (electronic copy accessible via the HDC website, written in plain English and is easy to read).
- Highlight inclusive design and usability of sustainable technologies for vulnerable groups.
- Build links with the Council's Consultation and Engagement Strategy to ensure inclusive engagement on climate/sustainability initiatives.