

EQUALITY SCREENING

Equality Impact Assessment guidance should be considered when completing this form.

POLICY/FUNCTION/ACTIVITY	LEAD OFFICER
Thames Basin Heaths Special Protection Area Supplementary Planning Document	Isabel Cordwell

A. What is the aim of this policy, function or activity? Why is it needed? What is it hoped to achieve and how will it be ensured that it works as intended? Does it affect service users, employees or the wider community?

As a Competent Authority, the Council has a requirement to provide a strategy to ensure the long-term protection of the Thames Basin Heaths Special Protection Area (SPA), in compliance with the Habitats Regulations, whilst enabling otherwise acceptable development. In 2009, the Thames Basin Heaths Joint Strategic Partnership Board, comprising all affected local authorities adopted guidelines in the form of a Delivery Framework to protect the SPA from new residential development that is likely to have a significant effect on the ecological integrity of the Heaths.

The aim of the updated Thames Basin Heaths SPA Supplementary Planning Document (SPD) is to avoid adverse effects on the SPA arising primarily from recreational use of the SPA by occupants of all net gain residential development up to 5km from the SPA boundary and for specific types of development within 5-7km of the Heaths.

The Council's current Thames Basin Heaths SPA Supplementary Planning Guidance (2009) requires updating and builds upon the principles set out in:

- Chapter 15 of the National Planning Policy Framework (2019);
- Policy saved NRM6 of the South East Plan;
- the Thames Basin Heaths SPA Delivery Framework (2009); and
- the Runnymede 2030 Local Plan (notably, Policies EE10: Thames Basin Heaths Special Protection Area; EE9: Biodiversity, Geodiversity and Nature; and EE11: Green Infrastructure).

and as such, it is a fundamental part of the planning policy 'toolkit' and is integral to the delivery of the Local Plan in relation to supporting the projected level of housing coming forward to meet the housing target set out in the Local Plan.

The avoidance and mitigation strategy is intended to protect three bird species which inhabit the Special Protection Area and in so doing, to improve the quality and quantity of alternative recreational open space available to the public. Those living, working or visiting the Borough will benefit from improved recreation areas (Suitable Alternative Natural Greenspace, "SANG"), and the wider community will benefit from the protection offered to the habitat and species of the SPA. Developers will benefit from guidance on how adverse impacts on the SPA can be avoided. However, it should be noted that other factors such as climate change; annual

fluctuations in weather; bird disease; predation by other wildlife; heath fires; vandalism; and development in adjoining local authorities could impact on the success of the strategy.

A further aim of the revised SPD, which has been prepared for public consultation, is to achieve a more equitable mechanism for collecting financial contributions, as it is considered that the current approach to SANG and SAMM (on a per unit basis) does not adequately address the potential increase in residents within the vicinity of the SPA.

When finalised, the document will be adopted as a supplementary planning document and will be an important material consideration during the determination of planning applications.

The SPD will not affect any employees or service users on the basis of any Protected Characteristics they have. Any effect it has on the wider community, including those groups with Protected Characteristics is likely to be beneficial through provision of high quality new open space for recreation and enhancement of any existing open space designated as SANG.

B. Is this policy, function or activity relevant to equality? Does the policy, function or activity relate to an area in which there are known inequalities, or where different groups have different needs or experience? Remember, it may be relevant because there are opportunities to promote equality and greater access, not just potential on the basis of adverse impacts or unlawful discrimination. The Protected Characteristics are: Sex, Age, Disability, Race, Religion and Beliefs, Sexual Orientation, Marriage and Civil Partnership, Gender Reassignment, Pregnancy and Maternity.

The avoidance and mitigation strategy set out within the SPD relates to new residential development within 7km of the SPA's boundary, irrespective of builder, financier, owner or occupant of the new dwellings.

To ensure that the strategy is more equitable in better reflecting the impacts from larger homes on the SPA, it proposed to alter the approach to calculating developer contributions from a dwelling to a bedroom-based tariff. This will align the Council's strategy with that of the other local authorities affected by the Thames Basin Heaths and would benefit smaller homes.

The strategy does specifically reference the Protected Characteristic of the **Race** in terms of Gypsy, Traveller and Show People in relation to residential accommodation for the purpose of calculating SANG and SAMM contributions but this is not known to cause any adverse impacts.

SANGs must be distributed across the borough and, when larger than 4 hectares, are encouraged to provide car parking facilities, unless the site is intended for local use and is within 400m of the developments linked to it. Where possible, sites with a gently undulating topography will be chosen for SANGS and boardwalks, visually sensitive way-markers and some benches can be provided. It is considered that this could have a positive impact on the Protected Characteristics of **Disability** and **Age** by providing easier access to semi-natural, managed green space for anyone with a visual impairment or restricted mobility, including older people and supervised young children, or anyone who is affected by mental health issues.

The SPD will enable and support the provision of new public open spaces (SANGs) which can be visited free of charge by the public and will not lead to a detrimental impact on socio-economic disadvantage.

Whilst there are no concerns with respect to the unmet needs of any of the Protected Characteristics, it is considered that the strategy offers opportunities to improve access to identified recreational semi-natural open spaces for young children and their carers, older people, and those with mental health, visual and mobility disabilities.

If the policy, function or activity is considered to be relevant to equality then a full Equality Impact Assessment may need to be carried out. If the policy function or activity does not engage any protected characteristics then you should complete Part C below. Where Protected Characteristics are engaged, but Full Impact Assessment is not required because measures are in place or are proposed to be implemented that would mitigate the impact on those affected or would provide an opportunity to promote equalities please complete Part C.

C. If the policy, function or activity is not considered to be relevant to equality, what are the reasons for this conclusion? Alternatively, if there it is considered that there is an impact on any Protected Characteristics but that measures are in place or are proposed to be implemented please state those measures and how it/they are expected to have the desired result. What evidence has been used to make this decision? A simple statement of 'no relevance' or 'no data' is not sufficient.

The SPD sets out the measures available to avoid or mitigate the impact of new development within the buffer zone adjacent to the Thames Basin Heaths, through s106 contributions and provision of, or in investment in, physical infrastructure. It is fully consistent and complementary to both the Thames Basin Heaths Delivery Framework (2009) and the adopted Runnymede 2030 Local Plan, of which the latter has had a detailed EqIA undertaken at each stage of Plan preparation and is used as a benchmark to assess this SPD. The Thames Basin Heaths Special Protection Area SPD provides detailed guidance to help implement the requirements of Policies EE9, EE10 and EE11 of the Runnymede Local Plan which has already been assessed under EqIA to have either positive or neutral impacts on protected characteristics of the population.

While it is anticipated that the implementation of the SPD will not have a negative impact on any of the nine Protected Characteristics, it is also anticipated that the 6-week public consultation may provide further information for officers to consider.

It is also acknowledged that more could be done to advance equalities of opportunity by ensuring that SANGS car parks have designated parking bays for people with a disability. Furthermore, there is a gap in data that could establish who is accessing the SANGS and also what issues are being experienced. Officers intend to obtain further information from the Thames Basin Heath Partnership which may be used to assess whether any future mitigation measures are required.

A review of the comments received following the public consultation will be undertaken and any implications in terms of equalities will be discussed with the Equality Group. Continued

monitoring of the Thames Basin Heaths Special Protection Area SPD will take place after it is adopted, which may reveal any positive or negative impacts that exist and will assist officers in providing measures that seek to mitigate any negative impacts on any of the protected characteristics.

It is proposed that, if adopted, this SPD should be reviewed within 5 years or earlier, if deemed necessary, along with a further Equality Impact Assessment screening. Overall, based on the information we currently have, it is not considered that there are any unmet needs in relation to any of the protected characteristics considered as part of this EqIA, or to any combination thereof. If the Thames Basin Heaths Special Protection Area SPD is adopted, it is anticipated that there will be positive impacts for all members of the community as a result of increased provision of public space within the borough and implementation of a more equitable approach to calculating tariffs for new residential development within the affected area. Therefore, it is not considered therefore that a full EqIA is required.

Date completed: 14th October 2020

Sign-off by senior manager: Georgina Pacey