Equality Analysis

Directorate: Place, Protection and Prosperity **Service Area:** Strategic Planning	**Lead Officer**: Jane Robinson, Local Plans and Infrastructure Manager **Date completed:** March 2026
Service / Function / Policy / Procedure to be assessed: Climate Change Supplementary Planning Document	
Is this: New / Proposed ☑ Existing/Review ☑ Changing ☐	**Review date:** March 2026

Part A – Initial Equality Analysis to determine if a full Equality Analysis is required.

What are the aims and objectives/purpose of this service, function, policy, or procedure?

- The Climate Change Supplementary Planning Document (SPD) encourages the delivery of more sustainable design for future developments within Spelthorne and supports the effective implementation of climate change policies within the Spelthorne Local Plan 2024-2039/40. The document supports the Council in meeting its Public Sector Equality Duty by ensuring the delivery of sustainably designed future development considers the diverse needs of residents.

Please indicate its relevance to any of the equality duties (below) by selecting Yes or No?

	Yes	No
Eliminating unlawful discrimination, victimisation and harassment		✓
Advancing equality of opportunity	✓	
Fostering good community relations	✓	

If not relevant to any of the three equality duties and this is agreed by your Head of Service, the Equality Analysis is now complete - please send a copy to Group Head Commissioning and Transformation. **If relevant**, a Full Equality Analysis will need to be undertaken (PART B below).

PART B: Full Equality Analysis

Step 1 – Identifying outcomes and delivery mechanisms (in relation to what you are assessing)

What outcomes are sought and for whom?	The Climate Change SPD seeks to provide guidance on delivering climate-resilient future development, including mitigation and adaptation measures and to ensure that sustainability is embedded within the planning application process through clear design principles. The SPD outcomes include reducing carbon emissions from new development; increasing the resilience of buildings, public spaces, and communities to climate impacts, such as heatwaves, flooding, and extreme weather; ensuring development follows clear standards for energy efficiency, water management, transport, materials, and biodiversity. The document also supports Spelthorne's ambition to reach Net Zero by 2030. These outcomes are sought for all residents but more particularly those vulnerable to heat, cold, and flooding. Future residents of new developments will also benefit from improved energy bills, resilient homes, and healthy environments, along with local businesses and employees who will likewise benefit from efficient buildings as well as sustainable transport. Spelthorne's diverse communities will also benefit from reduced pollution as well as improved public realm and green spaces. Biodiversity Net Gain (BNG) and green infrastructure principles will also benefit the natural environment.
Are there any associated policies, functions, services, or procedures?	The Climate Change SPD is associated with a range of existing policies, functions, services and procedures, including interpreting and relying on local and national policy frameworks, including the National Planning Policy Framework (NPPF) (2026). The SPD also directly supports and provides further guidance on the Spelthorne Local Plan 2024-2039/40 (particularly Policy PS1 and its supporting evidence). There are also associated strategies, plans and national legislation,

	such as the Spelthorne Climate Change Strategy 2022–2030, Surrey County Council Transport Plan, Local Cycle and Walking Infrastructure Plans (LCWIPs) and environmental legislation, specifically in regard to Biodiversity Net Gain under the Environment Act 2021. Associated processes include The SPD also supports compliance with the Equality Act 2010 by ensuring that the sustainably designed future development reflects the needs of diverse communities.
If partners (including external partners) are involved in delivering the service, who are they?	The delivery of climate-resilient development involves Surrey County Council in regard to highways, transport planning, EV infrastructure, and flood risk matters. Delivery of sustainably designed development also involves key partners such as developers, landowners and planning applicants, utility providers (e.g. Energy networks, water companies, drainage authorities). environmental bodies (e.g. Natural England, DEFRA, Environment Agency (BNG, SuDS guidance).

Step 2 – What does the information you have collected, or that you have available, tell you?

What evidence/data already exists about the service and its users? (in terms of its impact on the 'equality strands,' i.e. race, disability, gender, gender identity, age, religion or belief, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups) and **what does the data tell you?** e.g. are there any significant gaps?

A range of evidence already exists to inform the Climate Change SPD. The SPD draws on several key datasets that provide detailed information about increasing climate risks, including heatwaves and flooding, which disproportionately affect older people, disabled people, young children, pregnant women, and those with pre-existing health conditions (Section 1 and 2). The evidence highlights the need for shade, access to nature, improved and accessible public spaces, specifically accessible active travel routes supporting users with mobility needs, safe streets, and reduced pollution. The evidence also highlighted some economic benefits, including reduced travel costs and cheaper heating bills. While the evidence base is strong overall, it contains limited equalities specific data, meaning some protected groups may be underrepresented in the analysis. Existing evidence provides a strong understanding of general climate change impacts and needs to ensure climate-resilience, though detailed data for some protected groups (e.g. ethnic minorities, LGBTQ+ residents, Gypsy & Traveller communities)

is limited and could go further to understand which groups are most affected by climate change-related issues. Future updates and consultation to understand the needs of these groups will help close these gaps.

Has there been any consultation with, or input from, customers / service users or other stakeholders? If so, with whom, how were they consulted and what did they say? If you haven't consulted yet and are intending to do so, please list which specific groups or communities you are going to consult with and when.

The updated draft Climate Change SPD has been developed using existing evidence sources and a public consultation on the current SPD took place between 18 September 2023 and 16 October 2023. Consultation has not yet taken place for this update to the Climate Change SPD. The Council are intending to run a statutory public consultation on the draft SPD for 4 weeks, starting from the 8 May 2026, subject to approval at E&S Committee on 16 March 2026. This will enable all stakeholders to provide comment before the final version of the SPD. The forthcoming consultation will provide valuable insight into any unintentional impacts on protected groups and will be incorporated into the updated analysis.

For the intended consultation, in line with the Council's Statement of Community Involvement (SCI), the certain consultees, bodies and groups would appropriately be consulted as part of the process for an SPD.

Are there any complaints, compliments, satisfaction surveys, or customer feedback that could help inform this assessment? If yes, what do these tell you?

There have been no complaints, compliments, satisfaction surveys or direct customer feedback relating to climate-resilience or the update to the Climate Change SPD. There is a statutory consultation scheduled to run for 4 weeks, starting from the 8 May 2026, which may help inform this assessment in the future. Particular responses relating to climate resilience, overheating, flooding, accessibility, air quality, active travel routes, and green space access will be specifically useful to help inform this assessment. Understanding the needs of the Borough's diverse groups, including residents with a disability, of different age groups and from different ethnic background etc. will also assist the assessment.

Step 3 – Identifying the negative impact.

a. Is there any negative impact on individuals or groups in the community?

Equality Themes	Barriers/Impacts identified	Solutions (ways in which you could mitigate the impact)
Age (including children, young people and older people)	• Climate measures such as EV charging, heat-pump installation, retrofit requirements or home energy standards may create cost or accessibility barriers for older and younger residents, particularly those on lower incomes. • Older people may be more vulnerable to heatwaves, cold homes, poor air quality and may need more accessible adaptation measures. • Children and young people are more exposed to poor air quality, heat stress and flood risk in some neighbourhoods. • Without age-specific analysis, the SPD risks assuming all groups can access and benefit from retrofit, energy efficiency advice or climate-adaptation measures equally.	• Ensure consultation deliberately seeks input from older people, youth groups, and schools. • Incorporate age-specific vulnerability data (heat vulnerability, fuel poverty rates, mobility needs) into future evidence updates. • Provide plain-English guidance, accessible formats, and targeted communications for older residents. • Encourage developers to design schemes that respond to heat resilience, shade, green infrastructure, and accessibility for residents of all ages.
Disability (including carers)	• Disabled residents may face higher energy needs, mobility challenges, and reliance on assistive technology—meaning poorly insulated homes or heatwaves disproportionately affect them. • Retrofit measures (e.g., loft insulation, internal wall insulation) can be physically disruptive and difficult for disabled residents. • EV charging or cycle infrastructure may be inaccessible to wheelchair users and those with limited mobility if not designed properly.	• Ensure engagement captures the views of disabled residents and carers early in the process. • Promote inclusive design by encouraging accessible EV charging bays, step-free routes, and accessible sustainable transport. • Encourage developers to integrate thermal comfort, ventilation, and accessible design into sustainability proposals.

	• Residents relying on benefits may struggle to afford adaptation/energy improvements without support.	• Consider signposting to grants, national retrofit funding and local support for energy efficiency measures.
Gender (men and women)	• Women, particularly single-parent households, may be disproportionately affected by fuel poverty and may have less capacity to absorb energy-related costs. • Men may be more represented in sectors impacted by changes required for sustainable construction or skills transitions. • The SPD does not currently assess gender-specific responses to climate vulnerabilities or ability to participate in consultation/retrofit schemes.	• Ensure consultation captures a balanced gender mix and the needs of single-parent households. • Consider targeting engagement materials to groups more likely to experience fuel poverty. • Encourage developers to consider designing public realm for safety, lighting, and accessibility—issues which often have a gendered impact.
Race (including Gypsies & Travellers and Asylum Seekers)	• Ethnic minority groups nationally experience higher levels of fuel poverty, overcrowding, and housing in areas at flood/heat risk. • Gypsy & Traveller communities may be affected by flooding, extreme heat, or energy-inefficient accommodation types. • Language barriers may affect ability to access retrofit schemes, climate guidance or consultation	• Engage directly with ethnic minority groups, Gypsy & Traveller communities, and asylum-seeker support services. • Provide accessible information, translation where needed, and community-based outreach. • Integrate race-specific vulnerability evidence (e.g., heat/flood vulnerability) into future updates.
Religion or belief (including people of no religion or belief)	• Some faith groups have multigenerational households which may experience higher heat stress, ventilation needs or fuel costs. • Places of worship may face specific challenges meeting retrofit or climate compliance standards due to heritage constraints.	• Consult with faith groups and community leaders on the SPD, particularly regarding impacts on places of worship. • Ensure guidance recognises the needs of heritage buildings and culturally specific living arrangements.

Gender Re-assignment (those that are going through transition: male to female or female to male)	• Transgender and non-binary residents may experience higher income precarity, barriers to accessing services, or unsafe living conditions intensified by heat/cold or fuel costs. • Lack of targeted evidence means their needs in relation to energy, safety or climate vulnerabilities may be overlooked.	• Engage with LGBTQ+ groups during consultation to understand specific climate-related vulnerabilities. • Ensure public realm and active travel proposals (lighting, safety) consider the needs of LGBTQ+ residents who may feel less safe in poorly lit areas.
Pregnancy and Maternity	• Pregnant women and infants are particularly vulnerable to poor air quality, overheating, damp/mould, and cold homes. • Climate-related health impacts, such as extreme heat, disproportionately affect pregnant residents. • Low-income single-parent households may face barriers to retrofit or energy-efficiency upgrades.	• Encourage developers to include green infrastructure, shade, and good ventilation to reduce overheating. • Ensure consultation reaches single parents and families with infants. • Incorporate health-based vulnerability data (e.g., risks associated with heat).
Sexual orientation (including gay, lesbian, bisexual and heterosexual)	• LGBTQ+ residents may experience higher housing insecurity and may be more reliant on rented or shared homes which often have lower energy efficiency. • Without specific datasets, risks related to climate vulnerability or access to information may be overlooked.	• Engage with LGBTQ+ community groups and networks during consultation. • Ensure inclusive design principles in shared spaces and public realm measures. • Provide accessible climate information and signposting aimed at diverse households.

Step 4 – Changes or mitigating actions proposed or adopted

Having undertaken the assessment are there any changes necessary to the existing service, policy, function, or procedure? What changes or mitigating actions are proposed?

The assessment indicates that some changes or mitigating actions may be needed. The draft SPD relies on strong climate resilience-related evidence but there are some gaps identified in terms of data for specific protected groups, so future analysis could incorporate analysis of these groups. When the statutory consultation takes place, the needs of protected groups should be captured. The final SPD should explicitly

reference inclusive design principles, accessibility expectations, and the need for equitable access to climate resilient development and benefits from this future development, across all protected groups. Further safeguards could be put in place, including embedding the consideration of impacts on all groups in the checklist process for applicants

Step 5 – Monitoring

How are you going to monitor the existing service, function, policy, or procedure?

Monitoring of the Climate Change SPD will rely on existing planning and housing processes. This includes through the Council's Local Plan monitoring, assessment by planning officers of conditions and obligations placed on planning permissions, the use of metrics and tools, the Urban Greening Factor, energy statements and renewable energy outputs, drainage strategies and SuDS performance and BREEAM/Passivhaus/other relevant accreditations Together, these mechanisms will allow the Council to monitor whether the policy is delivering the intended outcomes and identify any impacts on residents, including those within protected groups. Monitoring will include reviewing any disproportionate impacts on protected groups by using anonymised equalities data where available.

Part C - Action Plan

Barrier/s or improvement/s identified	Action Required	Lead Officer	Timescale
n/a	n/a	n/a	n/a

Equality Analysis approved by:

Group Head:	Date:

Please send an electronic copy of the Equality Analysis to the Equality & Diversity Team and ensure the document is uploaded to the EA Register which will be available to the public:

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