

Report to the Cabinet

Report reference: C-052-2021/22

Date of meeting: 11 April 2022



**Epping Forest
District Council**

Portfolio: Planning and Sustainability – Cllr.N Bedford

Subject: Partnership Agreement for the delivery of Strategic Access Management and Monitoring measures for the Epping Forest Special Area of Conservation

Responsible Officer: Nigel Richardson (01992 564110).

Democratic Services: Adrian Hendry (01992 564246).

Recommendations/Decisions Required:

- (1) That the Partnership Agreement for the delivery of the Strategic Access Management and Monitoring measures for the Epping Forest Special Area of Conservation set out in Appendix 1 is adopted as a material consideration in the determination of planning applications and prior approval consents under permitted development rights proposals for residential development which would result in a net increase in new dwellings within the Epping Forest District Council administrative area.**
- (2) That the Service Director for Planning (or any another Service Director in their absence or officer duly authorised by the Service Director for Planning) be given delegated authority to implement minor amendments to the Partnership Agreement which may arise during the process of final sign-off of the Agreement by the Council and partners to the Agreement, in consultation with the Planning and Sustainability Portfolio Holder.**
- (3) That the tiered level of financial contribution to be sought from net increases in new dwellings within 0-3km and 3-6.2km radius of the Epping Forest Special Area of Conservation arising from the granting of planning permissions and prior approval consents under permitted development rights shall be as set out in paragraph 25 below.**

Executive Summary:

The Epping Forest contains land which is subject to international protection for its biodiversity value by way of its designation as a Special Area of Conservation (SAC). The Council has a legal duty as a 'competent authority' under the Habitats Regulations to protect internationally important sites, such as the Epping Forest SAC, from the effects of development. This can be best achieved using measures put in place at the Local Plan level.

This report specifically concerns the potential impact of residential development on the Epping Forest SAC in relation to additional visitors using the Forest for recreational purposes.

The Partnership Agreement presented replaces the 'Interim Approach to Managing Recreational Pressure on the Epping Forest Special Area of Conservation' adopted by the Council in October 2018. The Agreement has been jointly developed by the Council with other competent authorities, Natural England and the Corporation of London as Delivery Body. The document outlines the updated Strategic Access Management and Monitoring (SAMM) Strategy for the Epping Forest and the Governance Arrangements to ensure that financial contributions that have been/ will be collected from development are spent in accordance with the purposes for which they have been secured and that proper monitoring of spending is put in place. Further, it outlines the robust approach to apportioning the SAMM Strategy costs to individual local authorities, based upon the likely increase in visitor pressure from each local authority as a result of development through respective Local Plans.

Finally, this Cabinet report also sets out the proposed approach for how Epping Forest District Council will secure funding from development in its administrative area in order to meet the SAMM Strategy costs apportioned to the local authority area.

The Partnership Agreement was considered by the Overview & Scrutiny Committee on 31 March 2022. As the report outlines, the Conservators of Epping Forest and the London Borough of Redbridge have approved the Partnership Agreement via their respective Committees and other neighbouring competent authorities are similarly progressing reports through their Committee processes.

Reasons for Proposed Decision:

To comply with the Council's legal duty as a 'competent authority' under the Habitats Regulations to protect internationally important sites, such as the Epping Forest SAC, from the effects of development. As the report outlines, this can be best achieved using strategic measures put in place at the Local Plan level. Natural England and the Conservators of Epping Forest both voiced their support for the progress made in finalising the approach to SAMM for Epping Forest in their representations on the Main Modifications to the Local Plan Inspector, although expressed concern that this needs to be swiftly finalised to enable the delivery of mitigation to commence. Adoption of the Partnership Agreement is therefore important to support the final stages of Examination of the Council's emerging Local Plan and to enable financial contributions to be paid to the accountable body for the SAMM delivery programme to commence.

Other Options for Action:

For Cabinet to decide not to adopt the Partnership Agreement for the delivery of SAMM measures for the Epping Forest SAC. This would mean that the Council would fail to comply with its legal duty under the Habitats Regulations and may be prevented from determining planning applications and applications for prior approval under permitted development rights which result in a net increase in new dwellings.

For Cabinet to decide on an alternative approach to secure funding to meet the SAMM Strategy costs apportioned to Epping Forest District.

Report:

Background

1. The Epping Forest contains land which is subject to international protection for its biodiversity value by way of its designation as a SAC. The SAC designation relates primarily for its value in respect of beech trees and wet and dry heaths and for its population of stag beetle. The site forms a critical part of the biodiversity assets and green and blue infrastructure of the District. As an internationally important site it is afforded the highest level of protection due to its habitats and species that are vulnerable or rare within an international context.

2. The Council, as the competent authority, has a duty to ensure that plans and projects which it has a responsibility for consenting will not have an adverse effect on integrity of the SAC. This includes by interfering with the restoration of such sites to favourable conservation status within the context of their conservation objectives. Where development plans or projects will have an adverse effect on the integrity of these sites, either alone or in combination with other plans and projects, the Council must assess the implications of such effects, and secure any avoidance or mitigation measures necessary to prevent an adverse effect on the integrity of the site.

3. The Council has a legal duty as a 'competent authority' under the Habitats Regulations to protect internationally important sites, such as the Epping Forest SAC, from the effects of development. This can be best achieved using measures put in place at the Local Plan level so that development projects have clarity on where they can develop and what measures may be necessary to incorporate into a development proposal or addressed through off-site measures including through either direct provision or by securing financial contributions towards their implementation. Strategic approaches to site mitigation often include, for example, access management strategies, habitat management, provision of new alternative natural greenspace for recreation, and sustainable transport choices and other air pollution management interventions.

4. The Epping Forest is experiencing considerable pressure on its habitats from visitors living within the District as well as from outside it. In addition, atmospheric pollution is having an adverse effect on parts of its ecosystems. Atmospheric pollution originates from a wide variety of sources including traffic, power generation, industry, commercial and domestic boilers and from agriculture, most of which is located some distance from the Forest itself. These have resulted in large areas of the Forest being described as having an 'unfavourable conservation status.'

5. The potential impact of development on the Epping Forest SAC in relation to visitor pressure arises primarily from residential development creating additional visitors using the Forest for recreational purposes. These additional recreational pressures can have an adverse effect on its sensitive ecosystems.

6. The Council recognises that additional residential development within parts of the District is likely to give rise to further visitor pressure on the Forest that needs to be either avoided or mitigated. These parts of the District are defined by a 'Zone of Influence' which has been established using evidence from visitor surveys in 2017 and 2019. The current 'Zone of Influence' is 6.2km but this may change over the course of the Local Plan period as a result of future visitor surveys that are scheduled to be undertaken as part of the Monitoring Framework for the Forest. In order to protect the vulnerable habitats within the Forest the Council will secure the provision or enhancement of alternative spaces and corridors that can relieve the recreational pressure on the Forest. This will be achieved by increasing public access to land that is not in the Forest and enhancing the character of

existing open spaces and the links between open spaces. These approaches are intended to improve access for walkers, dog walkers, cyclists and horse riders to recreational spaces other than the Forest as well as provide for additional space for wildlife and plant species. In order to achieve this objective the Council has adopted a Green Infrastructure Strategy which provides the District-wide framework for providing new areas of Suitable Alternative Natural Greenspace (SANG) related to a number of the Strategic Masterplan areas together with identified opportunities to provide an alternative recreational offer to the Forest, including through enhancements to existing open spaces. These measures will be implemented by developers of relevant sites or through securing financial contributions for the implementation of measures by the Council and its partners.

7. The Council does, however, recognise that there are no mechanisms for preventing new residents from using the Forest and that there is therefore a need to address this by working with the Conservators of Epping Forest to implement Site Access Management and Monitoring (SAMM) measures within the Forest itself. The Council adopted an 'Interim Approach to Managing Recreational Pressure on the Epping Forest Special Area of Conservation' (the Interim Approach) in October 2018 which identified a range of measures to be implemented and monitoring activities to be undertaken over the course of the period of the Council's emerging Local Plan. The Interim Approach also identified the level of financial contributions that would be secured from relevant developments within the 'Zone of Influence.'

8. The Conservators of Epping Forest presented the Partnership Agreement for approval at the Epping Forest & Commons Committee on 17 January 2022. The London Borough of Redbridge approved the Partnership Agreement and its local tariff at its Cabinet meeting on 08 March 2022. The other neighbouring competent authorities are taking the Partnership Agreement through their respective Committee processes on a similar timescale to that of Epping Forest District Council.

Governance Arrangements within the Partnership Agreement

9. In order to spend financial contributions that have been, or will be, secured from qualifying development there is a need to establish robust governance arrangements to ensure that there is proper legal and fiscal oversight. This is the purpose of the Governance Arrangements set out in Chapter 2 of the Partnership Agreement (see Appendix 1 to this report). The Governance arrangements have been developed collaboratively by a Technical Oversight Group (TOG) chaired by Natural England and comprising officer representation from:

Epping Forest District Council
LB Waltham Forest
LB Redbridge
LB Enfield
LB Newham
Natural England
Conservators of Epping Forest (as Delivery Body)

Officers from Harlow District Council, the London Legacy Development Corporation and Essex County Council also attend on a 'watching brief' only basis.

10. The Governance Arrangements have been legally reviewed by the parties to the Agreement. Importantly, the Governance Arrangements do not create a financial liability for either the individual authorities or the Conservators if the assumed level of development

does not come forward as anticipated. This is because the payment of contributions will be based on monies collected, which will occur on commencement of development, rather than on the grant of planning permission. Financial liability will occur if a Council does not actively pursue the collection of monies that are due as set out in a Section 106 planning obligation. It also makes provision for the short-term investment of monies that have been received but where spend is profiled for later in the SAMM delivery programme.

Updated SAMM Strategy within the Partnership Agreement

11. In adopting the Interim Approach the Council committed to continue to work with neighbouring authorities, the Conservators of Epping Forest and Natural England to update and refine the SAMM projects and programmes and the approach to securing financial contributions over the course of the Local Plan period.

12. To this end the Conservators commissioned Land Use Consultants (LUC) to undertake a more in-depth review of the projects and programmes needed to ensure that there would be no adverse effect on the Epping Forest SAC in relation to recreational pressures arising from new development. The projects and programmes as proposed by LUC identified a need for some £63 million to be invested in the Epping Forest SAC based on an 'in-perpetuity basis of 125 years. The projects and programmes have been rigorously assessed by both the competent authorities and Natural England to ensure that it can be demonstrated that such measures can be attributed as being necessary to mitigate the effects of qualifying development. In addition, whilst the competent authorities considered that the use of an 'in-perpetuity' period was justified, basing this on a 125-year period was not. The purpose of the assessment was to ensure that any financial contributions sought would be in accordance with the tests set out at Paragraph 56 of the National Planning Policy Framework and the Community Infrastructure Levy Regulations in that such contributions are:

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

This review has resulted in a significant refinement of the projects and programmes that were identified in the LUC Report that are deemed as being necessary to mitigate the effects of qualifying development and that the 'in-perpetuity' period used should be for 80 years. The consequence of this is that the initial cost of the measures indicated by the LUC report of some £63 million has reduced to some £24.8 million within the SAMM Strategy that is the subject of this report.

13. The SAMM Strategy that is proposed to be adopted does, however, result in a significant uplift in the overall costs of the measures needed to mitigate the effects of qualifying development from those identified in the Interim Approach. There are a number of reasons for this. Firstly, the Interim Strategy did not take into account the need to ensure that the measures would be delivered over the lifetime of the development i.e. that they would be delivered 'in-perpetuity.' Secondly, the Strategy now includes additional 'people' resources through the provision of three 'Ambassadors' to work with both visitors and local communities to raise awareness of the issues facing the Epping Forest and to work with visitors to ensure that their behaviours and activities are 'Forest Friendly.' The cost of project managing the implementation of the projects and programmes and the provision of necessary monitoring information has also been included. The need for these posts to be provided 'in-perpetuity' has had a significant impact on the overall costs over and above those identified in the Interim Strategy. Thirdly, the assessment of physical assets that will need to be maintained on a cyclical basis and investment needed at the three visitor 'hubs' has been more rigorously assessed.

14. Officers are satisfied that the measures and costs in the SAMM Strategy as set out in Schedule 1 of the Partnership Agreement at Appendix 1 are necessary and proportionate and that the Strategy be adopted as a material consideration in the determination of planning and development related applications.

Approach to apportionment across the local authorities

15. As well as developing the Governance Arrangements and the SAMM Strategy the TOG has worked together to develop an appropriate approach as to how the costs of delivering the SAMM Strategy should be apportioned to individual local authorities.

16. The financial costs of the Interim Approach amounted to £2,593,112 (based on 2018 costs) and the apportionment of those costs was as follows:

Epping Forest District Council £1,355,679 (52.28%)
 LB Waltham Forest 37.00% £959,452 (37.00%)
 LB Redbridge £277,982 (10.72%)

17. A significant amount of work has been undertaken since that time to ensure that the approach to apportioning the SAMM Strategy costs to the individual local authorities is robust, justified and proportionate. In doing so, regard has been had to approaches taken in other parts of England. This work has resulted in the development of a more refined approach to that used for the Interim Approach. In essence, the approach now proposed is based on the percentage increase in visitor pressure likely to arise from each local authority area as a result of new development proposed for allocation through local plans. This contrasts with the Interim Approach which was based on the percentage of visitors from each local authority area currently. As a result, the overall percentage of the total SAMM Strategy costs attributed to Epping Forest District has reduced from 52.28% to 15.66%. The proposed apportionment of costs per authority is set out in the table below:

Authority	% of pressure caused by new development	Apportionment (80 years)
EFDC	15.66%	£3,886,415.65
WF	68.13%	£16,908,141.66
Redbridge	12.51%	£3,104,665.38
Newham	1.18%	£292,846.13
Enfield	2.52%	£625,400.22
SAMM Programme Total:		£24,817,469.05

Approach to securing financial contributions within Epping Forest District

18. The overall apportionment of costs arising from the SAMM Strategy is a matter for all of the relevant authorities to agree on (as per paragraphs 20-22). However, it is for individual local authorities to determine how they wish to secure funding from development in their administrative area. The rationale used by EFDC in the Interim Approach was that financial contributions would only be sought from qualifying development within 3km of the

Epping Forest SAC. This reflected the fact that the vast majority of all the District's visitors within the entire ZOI lived within 3km of the Epping Forest SAC boundary. The level of contribution sought by EFDC is currently £352 per dwelling.

19. It is important to acknowledge what other recreational mitigation/avoidance measures are being secured from development within the District. These costs are separate to the costs arising from the SAMM Strategy and will continue to be secured as set out below:

Within 3km of the Epping Forest SAC:

- £716 per dwelling is required from new residential development within the parishes of Buckhurst Hill/Loughton/Theydon Bois to contribute toward the implementation of the Roding Valley Recreation Ground/Public Rights of Way infrastructure enhancement projects.
- SANG at South Epping Masterplan Area.
- Contributions to mitigation measures within Lea Valley Regional Park from Waltham Abbey North Masterplan Area.

Within 3-6km:

- Provision of SANG at Latton Priory, Water Lane and North Weald Bassett.

All development is also required to make contributions toward the implementation of the Air Pollution Mitigation Strategy.

20. In addition to the above considerations, cognisance also needs to be given to the evidence provided by the 2017 and 2019 Epping Forest SAC Visitor Surveys. These surveys indicated a minority of visitors from the Epping Forest District administrative area came from the area within 3-6.2km of the Epping Forest SAC. This is not unsurprising given the rural nature of large parts of Epping Forest District within this area. However, there are a number of sites/parts of sites proposed for allocation in the Council's emerging Local Plan that would fall within this area where visits to the Epping Forest SAC could not be discounted. Consequently, it is recommended that all qualifying development will be required to contribute with a 'tiered' approach so that development that is closest to the Epping Forest SAC pays proportionately more than development further afield. A ratio of 90/10 has been determined which broadly reflects the current Visitor survey evidence and results in a contribution of:

Within 3km: £3,497,774.09 = £1852.63 per dwelling

Within 3 - 6.2km: £388,641.57 = £343.02 per dwelling

21. Officers consider that the above approach is the most robust and proportionate having had regard to Paragraph 56 of the National Planning Policy Framework and the Community Infrastructure Levy Regulations and should be adopted by the Council. Officers recognise that this will be an additional financial burden for developments. However, it is important to recognise that the costs of each applicant having to develop their own site specific ('bespoke') solution would be likely to be more costly and it may well be difficult for them to be able to demonstrate that such measures would be effective and deliverable. In addition, the cost of avoidance and mitigation measures across England vary significantly depending on the nature of the internationally important site that is being protected and the measures needed. For example, the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy seeks a contribution of £122.30 (base date 2019). However,

contributions required by Bracknell Forest Borough Council in relation to the Thames Basin Heaths Special Protection Area average some £6785 per dwelling (within a range) to provide for SAMM and SANG (the SANG component adopts a similar approach to the Council's Infrastructure Enhancement Project for the Roding Valley Recreation Ground). For larger sites that are required to provide bespoke i.e. site specific SANG (which is the same approach as the Council is proposing on a number of the Strategic Masterplan sites) the average cost per dwelling for SAMM measures is some £797 (based on 2021/2022 figures).

Resource Implications:

As outlined within the report, the SAMM programme will be delivered through contributions from qualifying development. The Governance Arrangements do not create a financial liability for either the individual planning authorities or the Conservators of Epping Forest if the assumed level of development does not come forward as anticipated. The Planning Policy Team, within existing resources, will continue to play a role in the Technical Oversight Group as outlined within the Partnership Agreement.

Legal and Governance Implications:

The Local Plan, the Partnership Agreement and the approach to securing financial contributions within the District have been developed in accordance with Government Policy (NPPF) and Planning and Environmental Law. The Governance Arrangements have been legally reviewed by the parties to the Agreement.

Safer, Cleaner and Greener Implications:

The Local Plan contains policies designed to promote the notion of making good places to live, work and visit. This includes sustainable development, safer by design principles, the provision of alternatives to the car, energy efficiency, quality green infrastructure and environmental considerations. As outlined within Policy DM2 of the emerging Local Plan, the SAMM Strategy (within the Partnership Agreement) is a key element of the Local Plan's strategic approach to ensuring that development has no adverse impact on the site integrity of the Epping Forest SAC.

Consultation Undertaken:

The Local Plan has been developed in partnership with other local authorities under the Duty to Co-operate, local stakeholders and in consultation with residents. The Partnership Agreement has been developed collaboratively by the Technical Oversight Group including representation from Natural England, the City of London Corporation (as Conservators of Epping Forest) and relevant local authorities as set out in the body of the report. The Governance Arrangements have been legally reviewed by the parties to the Agreement.

Background Papers:

EB143/ Cabinet 18 October 2018/ Interim Approach to Managing Recreational Pressures on the Epping Forest Special Area of Conservation. See <https://www.efdclocalplan.org/wp-content/uploads/2020/01/EB143.pdf>

EB715/ Epping Forest Special Area of Conservation Visitor Survey 2017. See <http://www.efdclocalplan.org/wp-content/uploads/2018/08/EB715-Epping-Forest-Visitor-Survey-Footprint-Ecology.pdf>

EB716/ Epping Forest Visitor Survey 2019. See <https://www.efdclocalplan.org/wp-content/uploads/2021/02/EB716-Epping-Forest-visitor-report-2019-030221.pdf>

Overview & Scrutiny Committee 31 March 2022/ Epping Forest Special Area of Conservation Strategic Access Management and Monitoring Strategy and Governance Arrangements. See <https://rds.eppingforestdc.gov.uk/ieListDocuments.aspx?CId=395&MId=10926>

Risk Management:

Risks to the Council in not adopting the Partnership Agreement would be the failure to comply with the Council's legal duty under the Habitats Regulations and potential prevention from determining planning applications and applications for prior approval under permitted development.

Equality Impact Assessment

1. Under s.149 of the Equality Act 2010, when making decisions, Epping District Council must have regard to the Public Sector Equality Duty, i.e. have due regard to:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sexual orientation.
3. In addition to the above protected characteristics you should consider the cross-cutting elements of the proposed policy, namely the social, economic and environmental impact (including rurality) as part of this assessment. These cross-cutting elements are not a characteristic protected by law but are regarded as good practice to include.
4. The Equality Impact Assessment (EqIA) document should be used as a tool to test and analyse the nature and impact of either what we do or are planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. Use the questions in this document to record your findings. This should include the nature and extent of the impact on those likely to be affected by the proposed policy or change.
6. Where this EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. All **Cabinet, Council, and Portfolio Holder reports must be accompanied by an EqIA**. An EqIA should also be completed/reviewed at key stages of projects.
8. To assist you in completing this report, please ensure you read the guidance notes in the Equality Analysis Toolkit and refer to the following Factsheets:
 - Factsheet 1: Equality Profile of the Epping Forest District
 - Factsheet 2: Sources of information about equality protected characteristics
 - Factsheet 3: Glossary of equality related terms
 - Factsheet 4: Common misunderstandings about the Equality Duty

- Factsheet 5: Frequently asked questions
- Factsheet 6: Reporting equality analysis to a committee or other decision making body

Section 1: Identifying details
Your function, service area and team: Planning Policy
If you are submitting this EqIA on behalf of another function, service area or team, specify the originating function, service area or team: N/A
Title of policy or decision: Partnership Agreement for the delivery of Site Access Management and Monitoring measures for the Epping Forest Special Area of Conservation
Officer completing the EqIA: Vicki Willis Tel: 01992 564593 Email: vwillis@eppingforestdc.gov.uk
Date of completing the assessment: 02.03.22

Section 2: Policy to be analysed	
2.1	Is this a new policy (or decision) or a change to an existing policy, practice or project? Yes – change to existing
2.2	Describe the main aims, objectives and purpose of the policy (or decision): What outcome(s) are you hoping to achieve (i.e. decommissioning or commissioning a service)? To agree an approach to managing recreational pressures on the Epping Forest Special Area of Conservation. To satisfy the Council’s legal duty as a ‘competent authority’ under the Habitats Regulations to protect internationally important sites, such as the Epping Forest SAC, from the effects of development.
2.3	Does or will the policy or decision affect: <ul style="list-style-type: none"> • service users • employees

	<ul style="list-style-type: none"> the wider community or groups of people, particularly where there are areas of known inequalities? <p>The SAMM Strategy will have an impact on the wider community who use the Forest including those with mobility issues.</p> <p>Will the policy or decision influence how organisations operate? Yes – it will enable financial contributions to be paid to the Conservators of Epping Forest as accountable body to enable them to deliver the SAMM programme.</p>
2.4	<p>Will the policy or decision involve substantial changes in resources? Yes - for the Conservators of Epping Forest.</p>
2.5	<p>Is this policy or decision associated with any of the Council’s other policies and how, if applicable, does the proposed policy support corporate outcomes? The decision supports the implementation of policies within the Council’s emerging Local Plan, the adoption of which is a key corporate priority as set out in the Council Plan.</p>

Section 3: Evidence/data about the user population and consultation¹

As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).

3.1	What does the information tell you about those groups identified? Survey information has provided an understanding of the nature and frequency of activities undertaken by visitors to the Epping Forest SAC.
3.2	Have you consulted or involved those groups that are likely to be affected by the policy or decision you want to implement? If so, what were their views and how have their views influenced your decision? Yes – through the Council’s Local Plan process and through Duty to Co-Operate Mechanisms.
3.3	If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary: See above.

Section 4: Impact of policy or decision

Use this section to assess any potential impact on equality groups based on what you now know.

Description of impact	Nature of impact Positive, neutral, adverse (explain why)	Extent of impact Low, medium, high (use L, M or H)
Age	None	N/A
Disability	None	N/A
Gender	None	N/A
Gender reassignment	None	N/A
Marriage/civil partnership	None	N/A
Pregnancy/maternity	None	N/A
Race	None	N/A
Religion/belief	None	N/A
Sexual orientation	None	N/A

Section 5: Conclusion

		Tick Yes/No as appropriate	
5.1	Does the EqIA in Section 4 indicate that the policy or decision would have a medium or high adverse impact on one or more equality groups?	No <input checked="" type="checkbox"/>	
		Yes <input type="checkbox"/>	If ' YES ', use the action plan at Section 6 to describe the adverse impacts and what mitigating actions you could put in place.

Section 6: Action plan to address and monitor adverse impacts

What are the potential adverse impacts?	What are the mitigating actions?	Date they will be achieved.

Section 7: Sign off

**I confirm that this initial analysis has been completed appropriately.
(A typed signature is sufficient.)**

Signature of Head of Service: Nigel Richardson

Date: 02/03/22

Signature of person completing the EqIA: Vicki Willis

Date: 02.03.22

Advice

Keep your director informed of all equality & diversity issues. We recommend that you forward a copy of every EqIA you undertake to the director responsible for the service area. Retain a copy of this EqIA for your records. If this EqIA relates to a continuing project, ensure this document is kept under review and updated, e.g. after a consultation has been undertaken.