

# Appendix A

## Equalities Impact Statement

# Places for Everyone

## Equalities Impact Statement

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**Ove Arup & Partners Limited**  
6th Floor 3 Piccadilly Place  
Manchester  
M1 3BN  
United Kingdom  
[arup.com](http://arup.com)

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	Prepared by	Checked by	Approved by
Name	Rebecca Crockett	Emilly Kitching Bower	Jane Healey Brown
Signature			

Filename			
Description			
	Prepared by	Checked by	Approved by
Name			
Signature			

Filename			
Description			
	Prepared by	Checked by	Approved by
Name			
Signature			

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# 1. Introduction

This statement describes the process and findings of the Equality Impact Assessment (EqIA) which is an integral part of the Integrated Assessment of the Places for Everyone (PfE) Integrated Assessment (IA), herein referred to as the PfE Plan.

The EqIA for the PfE Plan is not a separate process and has been embedded within the IA. However, for transparency and clarity, this separate statement on the EqIA is provided as an appendix to the 2023 IA Addendum Report. This EqIA has been revised and updated following the previously completed statement in 2020.

## 1.1 Background

As detailed in Section 2.3 of the Main IA Report and the 2023 Addendum Report, the Equality Act 2010 imposes a duty on public bodies that shape policy, deliver services and/or employ people. The duty requires public bodies to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by or under the Act;
- advance equality of opportunity between people who share a characteristic and those who do not share a characteristic; and
- foster good relations between people who share a characteristic and those who do not share a characteristic.

EqIA is designed to ensure that discrimination does not occur in the drawing up of plans and policies, and that such plans or policies meet the requirements of equality legislation in the UK, most notably the Equality Act 2010. It is being used as part of the IA to add value and depth to the assessment process.

It should be noted that the EqIA seeks to not only avoid / mitigate negative impacts on equality, but is also focused on enhancing, in this case the PfE Plan objectives and policies, in relation to equality matters. As such, the IA goes beyond the minimum requirements of assessing impacts in line with the Equality Act 2010, but also provides a holistic assessment of equality, diversity and health and wellbeing (an important factor in determining equality) and embeds this within the IA framework and throughout the assessment of the iterations of the draft PfE Plan.

This statement provides an update on the 2020 draft PfE Equality Impact Statement by considering the changes made in the 2023 PfE Plan Main Modifications, following the examination of the plan, including overall recommendations for the 2023 PfE Main Modifications that relate to equality.

## **1.2 Purpose and structure of the report**

The purpose of this EqIA Statement is to outline how due regard has been given in the Full IA to the potential effects of the proposed policies and strategy on the protected characteristics or persons identified under the Equality Act, but also looking at equality issues more holistically (as explained above).

This Statement is structured to demonstrate compliance with the requirements of the Equality Act 2010. It includes the following sections:

- Section 2: Summary of requirements of Equality Act 2010;
- Section 3: Description of EqIA screening methodology; and
- Section 4: Results of EqIA screening assessment.

## 2. Requirements of the Equality Act 2010

The Equality Act (2010) came into effect in October 2010 with the aim of harmonising all current discrimination law and strengthening the laws that prevent discrimination. It applies to the provision of services and public functions and includes the development of local authority policies and plans. The Act maintains the protection provided by previous legislation and therefore prevents discrimination on the basis of nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

Inequality can exist in a number of forms and with regards to spatial planning, this can include inadequate provision of, and access to services (e.g. health, food stores, and education facilities), good quality housing, employment opportunities, a healthy living environment and transport infrastructure for all members of society.

The Equality Act 2010 does not outline how public authorities should assess the effects on equality of new policies and programmes, but doing so is an important part of complying with the general duty. The approach in this report reflects the principles of the Equality Framework for Local Government.

An EqIA seeks to improve the work of local authorities and ensures that the policies and plans it develops do not discriminate in the manner in which they provide services and employment. EqIA also aims to ensure that local authorities do all they can to advance equality of opportunity between the people who do, and the people who do not share a relevant protected characteristic.

## 3. Equality Impact Assessment Screening Methodology

### 3.1 Key stages in EqIA

The methodology adopted for the EqIA of the draft PfE Plan involves two principal stages.

Stage 1 is the EqIA screening, the stages for screening are as follows:

- identification of the purpose/aims of the strategy/plan;
- identification of other plans/policies/strategies that relate to the strategy/plan in relation to equality;
- summarise baseline information on equality issues; and
- assess the impacts of the strategy/plan on protected characteristics or persons.

The steps within Stage 2 include:

- gathering of any additional baseline information;
- agreement of scope with wider stakeholders as necessary;
- detailed assessment of strategy/plan; recommendations for mitigation; identification of monitoring measures for implementation; and
- reporting of EqIA results, further consultation as necessary and finalise based on responses.

### 3.2 Stage 1: EqIA Screening

The Screening stage has been split into four tasks as set out below. Please note that the EqIA screening stage was published and consulted upon as an Appendix to the 2019 GMSF IA.

#### Task 1: Identification of the aims/objectives of the PfE Plan

The following questions were used as part of this task:

- What are the main aims, objectives, purpose and outcomes of the PfE Plan and its policies?
- Who will implement the PfE Plan policies?
- Who will be affected by the PfE Plan policies?



## Task 2: Description of other plans, programmes, and strategies related to the PfE Plan in relation to equality

This identified relevant documents that relate to the development of the PfE Plan in relation to equality. This task was completed as part of the IA Scoping stage and revisited as part of the 2020 updated Scoping Report.

## Task 3: Review baseline data

This involves identifying relevant data on equality issues at the Greater Manchester level. This task is based on work completed as part of the IA Scoping stage and revisited as part of the 2020 updated Scoping Report.

## Task 4: Screening Assessment

This task brings together information gained at Tasks 1-3 to support a screening conclusion, which is embedded within the IA Scoping and Assessment process. The assessment uses the IA scoring categories used across the IA, as shown below in Table 1 with the assessment informed by the following questions:

- Will the policy have a negative impact on the protected characteristic or person?
- How can the identified negative impact be avoided or mitigated?
- How can identified positive impacts be enhanced?
- Is monitoring of the issue during implementation required?

This assessment focuses on the identified protected characteristics identified in the Equality Act. The wider EqIA assessment has been embedded into the full IA.

**Table 1: Assessment Key**

Assessment Key	
++	Very positive effect
+	Positive effect
?	Uncertain
-	Negative effect
--	Very negative effect
O	Neutral/ no effect

## 4. Results of the EqIA Screening Assessment

The screening assessment Task 1 to 3 below formed part of the scoping stage for the IA. This ensured that equality issues were embedded into the IA from the outset. For completeness, the tasks are summarised here.

### 4.1 Task 1: Identification of the aims/objectives of the PfE Plan

#### 4.1.1 What are the main aims, objectives, purpose and outcomes of the PfE Plan and its policies?

The PfE Submission Plan 2021 sets out the proposed strategy for nine of the local authorities of Greater Manchester. Once the PfE Plan is adopted, it will form one of the key policy documents for all of the districts.

The PfE Submission Plan 2021 sets out its objectives (section 4 of the IA Report) and policies that have been developed. The policies are thematic (as explained in section 6 to 14 of the IA report) and site allocations (as explained in section 16 of the IA report).

#### 4.1.2 Who will implement the PfE policies?

The nine Greater Manchester Authorities will implement the PfE Plan. Once the plan is adopted, the districts will take on the responsibility for the implementation of the plan.

#### 4.1.3 Who will be affected by the PfE policies?

The PfE Plan applies to the Greater Manchester area, with the exception of Stockport, consisting of the remaining nine local authority areas. It will affect people living, working and visiting this area.

### 4.2 Description of other plans, programmes and strategies related to the PfE Plan in relation to equality

A summary of plans, programmes and strategies that are most directly related to the PfE Plan in relation to equality issues are provided within the Scoping Report. They include:

- Sustainable Communities: Building for the Future 2006
- Confident Brighter Communities 2010
- Healthy Lives, Healthy People White Paper 2011
- Laying the Foundations: A Housing Strategy for England 2011
- Public Health White Paper 2011

- Greater Manchester Third Local Transport Plan 2011
- Greater Manchester Rail Policy 2012
- Health and Social Care Act 2012
- Greater Manchester Growth and Reform Plan 2014
- National Planning Policy Framework 2019
- Transport for the North Strategic Transport Plan 2019
- Greater Manchester Local Industrial Strategy 2019
- Greater Manchester Cultural Strategy 2019
- Planning for the Future White Paper 2020

### **4.3 Review of baseline data**

The IA Scoping Report, which has been updated as part of the 2020 GMSF IA, details the population and demographic baseline and trends for Greater Manchester. This should be referred to for data related to many of the Equality Act 2010 protected characteristics. Please note that it was not possible to readily obtain data at the Greater Manchester level for all protected characteristics. This is not considered to be a significant limitation to the EqIA assessment process given the city-region scale at which policies apply and that the assessment is based on the nature (positive, negative, neutral or uncertain) of the effect.

### **4.4 Screening Assessment**

This section summarises the updated EqIA screening assessment, to include new and amended policies, which formed part of the Scoping Stage. The screening assessment focuses on the nine identified protected characteristics, with the wider EqIA assessment having taken place as a part of the IA. The tables associated with this assessment are contained within Attachment A of this report.

## 5. The Integrated Assessment – Summary and Conclusions relating to Equality

There have been improvements to PfE Plan policies at each stage of the evolution of the PfE Plan which seek to enhance equality across Greater Manchester. The 2023 updated position is outlined in detail as an integral part of the 2023 PfE IA Addendum Report. The following summarises a number of the key changes:

- Thematic policies
- Allocation policies
- Residual recommendations which the Greater Manchester Authorities will consider as a result of the 2023 Main Modifications IA process.

It should be noted that only the thematic policies with potentially significant and significant changes have been reassessed as part of the 2023 IA. Therefore, this EqIA has only assesses those policies. The remaining policies should be considered to remain the same as the 2020 EqIA Assessment. All of the allocation policies have been reassessed as part of the 2023 IA and therefore have all been reassessed in this EqIA Assessment.

### 5.1 Thematic Policies

The PfE Submission Plan 2021 thematic policies cover a wide range of topics. The PfE Main Modifications 2023 have received positive scores against the IA objectives. Those which particularly relate to issues of equality are listed below.

***Policy JP-J3 – Office Development*** has been amended, adding the requirement for refurbished office accommodation to improve standards of accessibility in accordance with Part M (Volume 2) Building Regulations. This addresses previously recommended mitigation on including accessibility standards in the policy. Therefore, the scoring has increased to positive against the Disability Protected Characteristic.

***Policy JP-C7 – Transport Requirements of New Development*** had text added that references the layout, design and landscaping of development should prioritise the provision of safe, secure and attractive access to local services and facilities for pedestrians, cyclists and people with a disability. However, the EqIA scoring is already very positive against the Disability Protected Characteristic; therefore, the scoring remains the same.

**Policy JP-G6 – Urban Green Space and Policy PJ-P7 – Sport and Recreation** have been amended removing reference to accessibility standards, in respect of urban green spaces and new sports facilities. Yet it is important to ensure equal opportunity for all. However, it is considered that the assessment criteria are met when the plan is read as a whole, particularly Policy JP-P1. The EqIA scoring is already neutral against both thematic policies and so the scoring remains the same.

**JP-CX The Strategic Road Network** is a new thematic policy added as part of the PfE 2023 Main Modifications Policy. The policy has therefore been assessed as part of the EqIA Screening Assessment. This policy makes no reference to any of the nine protected characteristics and so has score neutral across all of the criteria.

## **5.2 Allocations**

The allocations are for the most part strategic in nature. However, a number seek to improve connectivity and accessibility of sites to employment and community services, the provision of outdoor play facilities and include air quality mitigation.

In addition, allocation policies are implemented in tandem with thematic policies explored in Section 5.1. This is to provide infrastructure, housing and employment for local communities, workers and visitors to Greater Manchester.

As a result, neutral scores against all of the protected characteristics are shown. Local plans will provide further detail on sites within each district.

## **5.3 Residual Recommendations from the 2023 Main Modifications**

Whilst changes have been made to the PfE Submission Plan 2021 through the proposed Main Modifications 2023, some of which impact on the scoring relating to equality, it is considered that these policies do not change against the assessment criteria when the plan is read as a whole. Therefore, no residual impacts have been recommended across the policies.

## **5.4 Conclusions**

The PfE Submission Plan 2021 sets out the proposed approach that Greater Manchester will take towards how it is planned and developments across the entire area. The development of the PfE Submission Plan 2021 has been influenced by a number of other plans, programmes and assessments that relate to the protected characteristics or persons under the Equality Act 2010.

EqIA considerations have been included within the IA objectives as part of the Integrated Assessment of the PfE Plan. The section above summarises the recommendations put forward for

the PfE Main Modifications 2023, and these will be considered by the Greater Manchester Authorities as the plan progresses.

# A.1 Assessment Tables

## EqIA Screening of Thematic Policies

Policy Ref	Thematic Policy	Age	Disability	Gender Reassignment	Pregnancy and Maternity	Race	Religion or Belief	Sex	Sexual Orientation
JP-Strat 1	Core Growth Area	0	0	0	0	0	0	0	0
JP-Strat 2	City Centre	0	0	0	0	0	0	0	0
JP-Strat 3	The Quays	0	0	0	0	0	0	0	0
JP-Strat 4	Port Salford	0	0	0	0	0	0	0	0
JP-Strat 5	Inner Areas	0	0	0	0	0	0	0	0
JP-Strat 6	Northern Areas	0	0	0	0	0	0	0	0
JP-Strat 7	North-East Growth Corridor	0	0	0	0	0	0	0	0
JP-Strat 8	Wigan-Bolton Growth Corridor	0	0	0	0	0	0	0	0
JP-Strat 9	Southern Areas	0	0	0	0	0	0	0	0
JP-Strat 11	New Carrington	0	0	0	0	0	0	0	0
JP-S2	Carbon and Energy	0	0	0	0	0	0	0	0
JP-S3	Heat and Energy Networks	0	0	0	0	0	0	0	0



<b>JP-S5</b>	Flood Risk and the Water Environment	0	0	0	0	0	0	0	0
<b>JP-S6</b>	Clean Air	+	0	0	0	0	0	0	0
<b>JP-S7</b>	Resource Efficiency	0	0	0	0	0	0	0	0
<b>JP-J2</b>	Employment Sites and Premises	0	0	0	0	0	0	0	0
<b>JP-J3</b>	Office Development	0	++	0	0	0	0	0	0
<b>JP-J4</b>	Industrial and Warehousing Development	0	0	0	0	0	0	0	0
<b>JP-H1</b>	Scale, Distribution and Phasing of New Housing Development	0	0	0	0	0	0	0	0
<b>JP-H2</b>	Affordability of New Housing	0	0	0	0	0	0	0	0
<b>JP-H4</b>	Density of New Housing	0	0	0	0	0	0	0	0
<b>JP-P2</b>	Heritage	0	0	0	0	0	0	0	0
<b>JP-G2</b>	Green Infrastructure Network	0	0	0	0	0	0	0	0
<b>JP-G5</b>	Uplands	0	0	0	0	0	0	0	0

<b>JP-G7</b>	Trees and Woodland	O	O	O	O	O	O	O	O
<b>JP-G9</b>	Biodiversity and Geodiversity	O	O	O	O	O	O	O	O
<b>JP-C3</b>	Our Public Transport	O	O	O	O	O	O	O	O
<b>JP-C5</b>	Cycling and Walking	O	O	O	O	O	O	O	O
<b>JP-C6</b>	Freight and Logistics	O	O	O	O	O	O	O	O
<b>JP-C7</b>	Transport Requirements for Development	O	++	O	O	O	O	O	O
<b>JP-CX</b>	The Strategic Road Network	O	O	O	O	O	O	O	O
<b>JP-D1</b>	Infrastructure Implementation	O	O	O	O	O	O	O	O

**EqIA Screening of Allocation Policies**

Allocation	Age	Disability	Gender Reassignment	Pregancy and Maternity	Race	Religion or Belief	Sex	Sexual Orientation
<b>Bolton</b>	O	O	O	O	O	O	O	O
<b>Bury</b>	O	O	O	O	O	O	O	O
<b>Manchester</b>	O	O	O	O	O	O	O	O
<b>Oldham</b>	O	O	O	O	O	O	O	O
<b>Rochdale</b>	O	O	O	O	O	O	O	O
<b>Salford</b>	O	O	O	O	O	O	O	O
<b>Tameside</b>	O	O	O	O	O	O	O	O
<b>Trafford</b>	O	O	O	O	O	O	O	O
<b>Wigan</b>	O	O	O	O	O	O	O	O