

Appendix 2

Equality Impact Assessment

**Tameside & Glossop Strategic Commission
Equality Impact Assessment (EIA) Form**

Subject / Title	2021 revision/update of Statement of Community Involvement
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Team	Department	Directorate
Planning Policy	Planning and Transport	Growth

Start Date	Completion Date
24/07/2020	2/11/2020

Project Lead Officer	William Partington
Contract / Commissioning Manager	Graham Holland
Assistant Director/ Director	Jeff Upton – Interim Assistant Director

EIA Group (lead contact first)	Job title	Service
William Partington	Planning Policy Officer	Planning Policy
Graham Holland	Planning Policy Team Manager	Planning Policy
Michael Clegg	Policy Officer	Policy, Performance and Intelligence

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PART 1 – INITIAL SCREENING

1a.	What is the project, proposal or service / contract change?	The update of Tameside Council's Statement of Community Involvement (SCI).
1b.	What are the main aims of the project, proposal or service / contract change?	<p>Regulation requires an SCI to be reviewed at least every five years. Tameside Council's current SCI was last reviewed on 31 August 2016 and is due for review. Since the SCI was last reviewed there are three areas of update and revision:</p> <ul style="list-style-type: none"> - The Covid-19 pandemic and how the Council is able to comply with its SCI in the context of local and national laws and guidance regarding social distancing - The Greater Manchester Spatial Framework (GMSF), a strategic development plan for the Greater Manchester conurbation of which Tameside is one of 10 constituent boroughs - General technical modifications such as government guidance about consultation on reviewing and updating SCI's now being optional

<p>1c. Will the project, proposal or service / contract change have either a direct or indirect impact on, or relevance to, any groups of people with protected equality characteristics?</p> <p>Where there is a direct or indirect impact on, or relevance to, a group of people with protected equality characteristics as a result of the project, proposal or service / contract change please explain why and how that group of people will be affected.</p>				
Protected Characteristics	Direct Impact/Relevance	Indirect Impact/Relevance	Little / No Impact/Relevance	Explanation
Age	<u>X</u>			The revision to the SCI which takes into account potential Covid-19 legislation or guidance could have a direct impact on, and relevance to, older people. This is because

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				<p>Covid-19 legislation that mandated closure of public libraries, the Council customer services centre, or potential physical consultation workshops would mean that the main methods of communication would be digital. Older people (65+) are less likely to have digital skills or access to the internet than working aged people (16-64) or younger people.</p>
Disability		<u>X</u>		<p>There may be an indirect impact on, or relevance to, people with a disability as the SCI sets out how the entire local community will be consulted on planning matters. However, it is not expected to be a direct impact, as in the case of the older people.</p>
Ethnicity		<u>X</u>		<p>There may be an indirect</p>

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				<p>impact on, or relevance to, people of minority ethnicities as the SCI sets out how the entire local community will be consulted on planning matters. However, it is not expected to be a direct impact, as in the case of the older people.</p>
Sex		<u>X</u>		<p>There may be an indirect impact on, or relevance to, people of different sex or genders as the SCI sets out how the entire local community will be consulted on planning matters. However, it is not expected to be a direct impact, as in the case of the older people.</p>
Religion or Belief		<u>X</u>		<p>There may be an indirect impact on, or relevance to, people with different religions or beliefs as the SCI sets out how the entire</p>

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				<p>local community will be consulted on planning matters. However, it is not expected to be a direct impact, as in the case of older people.</p>
Sexual Orientation		<u>X</u>		<p>There may be an indirect impact on, or relevance to, people with different sexual orientations as the SCI sets out how the entire local community will be consulted on planning matters. However, it is not expected to be a direct impact, as in the case of the older people.</p>
Gender Reassignment		<u>X</u>		<p>There may be an indirect impact on, or relevance to, people who are undergoing/have undergone gender reassignment as the SCI sets out how the entire local community will be consulted on planning matters. However, it is</p>

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				not expected to be a direct impact, as in the case of the older people.
Pregnancy & Maternity		<u>X</u>		There may be an indirect impact on, or relevance to, people who are pregnant or on maternity as the SCI sets out how the entire local community will be consulted on planning matters. However, it is not expected to be a direct impact, as in the case of the older people.
Marriage & Civil Partnership		<u>X</u>		There may be an indirect impact on, or relevance to, people who are married or in civil partnerships as the SCI sets out how the entire local community will be consulted on planning matters. However, it is not expected to be a direct impact, as in the case of the older people.

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Other protected groups determined locally by Tameside and Glossop Strategic Commission?				
Group (please state)	Direct Impact/Relevance	Indirect Impact/Relevance	Little / No Impact/Relevance	Explanation
Mental Health		<u>X</u>		There may be an indirect impact on, or relevance to, people with mental health issues as the SCI sets out how the entire local community will be consulted on planning matters. However, it is not expected to be a direct impact, as in the case of the older people.
Carers		<u>X</u>		There may be an indirect impact on, or relevance to, people who are carers as the SCI sets out how the entire local community will be consulted on planning matters. However, it is not expected to be a direct impact, as in the case of the older people.
Military Veterans		<u>X</u>		There may be an indirect

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				<p>impact on, or relevance to, people who are military veterans as the SCI sets out how the entire local community will be consulted on planning matters. However, it is not expected to be a direct impact, as in the case of the older people.</p>
Breast Feeding		<u>X</u>		<p>There may be an indirect impact on, or relevance to mothers who breast feed their children as the SCI sets out how the entire local community will be consulted on planning matters. However, it is not expected to be a direct impact, as in the case of the older people.</p>
<p>Are there any other groups who you feel may be impacted by the project, proposal or service/contract change or which it may have relevance to? <i>(e.g. vulnerable residents, isolated residents, those who are homeless)</i></p>				
Group (please state)	Direct Impact/Relevance	Indirect Impact/Relevance	Little / No Impact/Relevance	Explanation

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Low or no income groups	<u>X</u>			The revision to the SCI which takes into account potential Covid-19 legislation or guidance could have a direct impact on, and relevance to, people of low or no income. This is because Covid-19 legislation that mandated closure of public libraries, the Council customer services centre, or potential physical consultation workshops would mean that the main methods of communication would be digital. People of low or no income, particularly homeless people, are less likely to have access to the internet or methods of accessing it than people of higher income than them.
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1d.		Yes	No
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	Does the project, proposal or service / contract change require a full EIA?	X	
1e.	What are your reasons for the decision made at 1d?	<p>It is expected that the revision of the SCI could have a direct impact on two vulnerable groups, older people and people of low/no income.</p> <p>It is expected that the revision of the SCI could have an indirect impact on all of the other protected characteristic groups outlined in 1c.</p>	

If a full EIA is required please progress to Part 2.

PART 2 – FULL EQUALITY IMPACT ASSESSMENT

2a. Summary
<p>A Statement of Community Involvement (SCI) sets out the way a council will involve the local community, stakeholders and statutory bodies in the preparation and revision of local plan documents. A local plan is a development plan that sets out strategic priorities for an area and covers housing, commercial, public and private development.</p> <p>Regulation requires an SCI to be reviewed at least every five years. Tameside Council's current SCI was last reviewed on 31 August 2016 and is due for review. Since the SCI was last reviewed there are three areas of update and revision:</p> <ul style="list-style-type: none"> - The Covid-19 pandemic and how the Council is able to comply with its SCI in the context of local and national laws and guidance regarding social distancing - The Greater Manchester Spatial Framework (GMSF), a strategic development plan for the Greater Manchester conurbation of which Tameside is one of 10 constituent boroughs - General technical modifications such as government guidance about consultation on reviewing and updating SCIs now being optional. <p>The scope of this EIA is the review and revision of Tameside Council's Statement of Community Involvement and any consultation on a revised draft Statement of Community Involvement.</p> <p>An EIA was completed in 2016 for the 2016 update of the SCI. The pertinent changes from the 2016 SCI to the 2020 draft SCI, which will be focused on in this EIA are summarised below:</p>

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- The SCI must take into account local and national guidance regarding Covid-19, particularly in regards to social distancing and this may require tailoring of physical consultation methods, i.e. hard copies of documents in libraries
- The SCI has been updated to include an up to date email address whereby readers can register their interest about being informed about future GMSF consultation; reference to specific methodology of the GMSF consultation has been removed as some consultation has already taken place between August 2016 and August 2020; further consultation on the GMSF is planned and a separate EIA under which GMSF consultation in Tameside will fall is planned

Issues to consider, the impact on protected characteristic groups, and mitigations on these impacts are outlined in more detail in sections 2b, 2c and 2d; however in summary:

Due regard must be given to the Public Sector Equality Duty of the Equality Act 2010, the pertinent change from the 2016 version of the SCI to the 2020 version is that due to Covid-19 there could be a hypothetical second lockdown which would make some of the physical methods of consultation with the public outlined in the SCI impossible.

These physical methods of consultation are the displaying of planning documents in public buildings and physical consultations. If buildings were to be shut again due to Covid-19 then digital communication and consultation would be the main method, and older people and people of low/no income could be directly impacted by this as they are less likely to have access to digital methods of communication and consultation.

However, there are a number of other physical methods of communication which are already used in some cases due to legislative requirements, such as site notices, letters to neighbours of proposed developments and press notices. These physical methods could be considered for consultation with the community under the SCI.

Consultation on the draft SCI took place between Thursday 20 August and Thursday 1 October. The consultation on the draft SCI was promoted through the Partnership Engagement Network mailing list, which has contacts from a number of organisations representing protected characteristic groups, as well as through the Local Plan Consultation Database. The consultation webpage and online form also included a link to sign up to the Local Plan Consultation database so that members of the public or members of the Partnership Engagement Network mailing list can join this if they have not already done so.

2b. Issues to Consider

Section 149 the “Public Sector Equality Duty” of the Equality Act 2010 stipulates:

- (1) A public authority must in the exercise of its functions, have due regard to the need to-
 - (a) Eliminate discrimination, harassment, victimization and any other conduct that is prohibited by or under this Act;

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- (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to-

- (a) Remove or minimize disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- (b) Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of the persons who do not share it;
- (c) Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low

The removal of outdated GMSF methodology from the SCI, based on consultation that was planned in 2016 and has taken place since 2020, is not expected to impact or have relevance to particular protected characteristic groups, and future GMSF consultation within Tameside will have an independent EIA conducted rather than being within the scope of this EIA.

The updating of links to join the planning database of contacts and email addresses for enquiries, which is a change between the 2016 SCI and this 2020 version, is replacing like for like; an electronic method of communication with a similar electronic route of communication.

However, potential changes to the physical access to hard copies of planning documents due to the Covid-19 legislation and guidance, should be considered.

As the Statement of Community Involvement sets out the way the council will involve the local community in the preparation and revision of local plan documents it is expected that revisions to it will have at least an indirect impact on, or indirect relevance to, all of the nine protected characteristics defined by the 2010 Equality Act.

These are:

- Age
- Disability
- Ethnicity
- Sex/Gender
- Religion or Belief
- Sexual Orientation
- Gender Reassignment
- Pregnancy & Maternity
- Marriage & Civil Partnership

Revisions to the Statement of Community Involvement are also expected to have at least an indirect impact on, or indirect relevance to, the Tameside and Glossop Strategic Commission's locally determined protected characteristic groups:

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- Mental Health
- Carers
- Military Veterans
- Breastfeeding

As well as the additional vulnerable group of:

- Low income/no income

The impact on and relevance to these groups will be considered in section 2c.

Other considerations are that the Local Plan Consultation Database used by planning to consult on planning matters as part of the Statement of Community Involvement includes organisations representing different protected characteristic groups. Some of these groups are detailed below:

Age

Age UK;
Age UK Tameside; and
Borough wide Community and Residents Associations.

Disability

The Disabled Persons Transport Advisory Committee;
Tameside Deaf Association;
Greater Manchester Coalition of Disabled People; and
Borough wide Community and Residents Associations.

Ethnicity

Association of Ukrainians;
Shree Bharatiya Mandal (Indian Association);
Bangladesh Welfare Association;
Tameside Racial Equality Council Ltd;
The National Federation of Gypsy Liaison Groups;
The Gypsy Council (Romani Kris); and
Borough wide Community and Residents Associations.

Religion or Belief

Denton Council of Churches;
Muslim Welfare Society (Tameside);
Catholic Women's League (Ashton); and
The Church of England National Offices

Consultation

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As outlined in section 2d. although there is no longer a legislative requirement for the Council to consult on the update/revision of the SCI, it is recommended that we do so. By putting up the draft SCI for feedback from the public, and promoting through the Council's Partnership Engagement Network mailing list (and Local Plan Consultation Database), as well as social media, press releases, press notices, partner organisations, and internal staff communications, we will hopefully gain insight directly from protected characteristic groups within the community.

The Partnership Engagement Network mailing list has nearly 400 contacts, many of whom are organisations representing protected characteristic groups. These contacts will also be able to circulate the link to any consultation on the SCI more widely within their organisations and communities. The consultation on the SCI provided participants with the option to join the Local Plan Consultation Database as recommended. A consultation on the SCI would also be able to gather demographic information from participants, which may identify any unanticipated impact of the draft SCI on specific protected characteristic groups.

2c. Impact/Relevance

As the Statement of Community Involvement sets out the way the council will consult the local community on planning matters, revisions to it will have an indirect impact on, and indirect relevance to, all members of the local community. This includes the Equality Act and Tameside Strategic Commission protected characteristics of disability, ethnicity, sex/gender, religion/belief, gender reassignment, sexual orientation, marriage/civil partnership, pregnancy/maternity, mental health, carers, military veterans, and breast feeding.

However the pertinent revisions to the SCI focus on the potential restriction of physical consultation methods on planning matters due to Covid-19. If there was another local or national lockdown in the event of a second wave of Covid-19, public and office buildings may be shut, this would mean it would be impossible for physical hard copies of planning documents to be made available in the Council's customer service centre, libraries and other public buildings. It would also mean physical consultation events would not be able to take place.

Whereas these physical restrictions are not expected to have a direct impact on, or direct relevance to, the protected characteristic groups outlined in the first paragraph of this section (2c.), it is possible they will have a direct impact on, and direct relevance to, the Equality Act protected characteristic of age (older people) and the vulnerable group of people with low/no income. This is because these groups are less likely to have access to the internet or have less digital skills. As digital methods of consultation and communication would be the main method of consultation and communication in the event of another local or national lockdown, it is possible these two groups would be disproportionately impacted.

There are mitigations that can be made, as outlined in section 2d. however it should be stated that in the event of another national or local lockdown due to Covid-19 that mandated the closure of public buildings, closure of offices and restricted interpersonal contact, there would be no option other than to follow this guidance. Furthermore any future national or local lockdown is a hypothetical scenario, and not guaranteed, and if it took place it would likely be temporary. Further to this, it is likely that in a scenario of strict lockdown that took place from later March 2020 for a number of months, construction and planning processes would also be put on hold, potentially along with any consultation on them.

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2d. Mitigations *(Where you have identified an impact/relevance, what can be done to reduce or mitigate it?)*

<p>Older people impacted by hypothetical second Covid-19 lockdown, as mandatory closure of public buildings would prevent display of hard copies of planning documents for consultation and physical consultations from taking place. Older people are less likely to have access to digital methods of communication or consultation which would become the de facto in this hypothetical second lockdown.</p>	<ul style="list-style-type: none"> - Other physical methods of consultation as part of the SCI to be carried out when mandated by legislation, but also considered in the cases when not mandated, these include: site notices, notification letters to neighbours of proposed developments, press advertisements. These physical methods would still adhere to potential lockdown and social distancing requirements. - Recommended for a consultation to be carried out on the actual SCI draft document, although there is no necessity to do so as according to legislation. This would be promoted via the Council's Partnership Engagement Network mailing list (as well as the Local Plan Consultation Database) which has representatives from many protected characteristic groups, including groups relevant to older people and people of no/low income such as Age UK, homelessness charities, etc. This could also be promoted via a website page, social media, partner organisations, TMBC internal staff communications, press notice and press release. - Recommended that the link to sign-up to the Local Plan Consultation Database is included on the consultation about the SCI, so that the Local Plan Consultation Database can be more widely promoted amongst groups that represent protected characteristics.
<p>People who have low or no income impacted by hypothetical second Covid-19 lockdown, as mandatory closure of public buildings would prevent display of hard copies of planning documents for consultation and physical consultations from taking place. People of low or no income are less likely to have access to digital methods of communication or consultation which would become the de</p>	<ul style="list-style-type: none"> - Other physical methods of consultation as part of the SCI to be carried out when mandated by legislation, but also considered in the cases when not mandated, these include: site notices, notification letters to neighbours of proposed developments, press advertisements. These physical methods would still adhere to potential lockdown and social distancing requirements. - Recommended for a consultation to be carried out on the actual SCI draft document, although there is no necessity to do so as according to legislation. This would be promoted via the Council's Partnership Engagement Network mailing list (as well as the Local Plan Consultation Database) which has representatives from many protected characteristic groups, including groups relevant to older people and people of no/low income such as Age UK, homelessness charities, etc. This could also be promoted via a website page social media, partner organisations, TMBC internal staff communications, press notice and press release.

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facto in this hypothetical second lockdown.	<ul style="list-style-type: none"> - Recommended that the link to sign-up to the Local Plan Consultation Database is included on the consultation about the SCI, so that the Local Plan Consultation Database can be more widely promoted amongst groups that represent protected characteristics.
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2e. Evidence Sources
Equality Act 2010 Tameside Statement of Community Involvement 2016 Draft Tameside Statement of Community Involvement 2020 Government Covid-19 Guidance The Greater Manchester Spatial Framework

2f. Monitoring progress		
Issue / Action	Lead officer	Timescale
To liaise with Policy, Performance and Communications about creating and promoting a consultation with the public on the draft SCI.	William Partington	Complete
To liaise with Planning Policy about creating and hosting a consultation with the public on the draft SCI	Michael Clegg	Complete
To update this EIA once the results of the draft SCI consultation have been analysed	William Partington	Complete
Ensure Local Plan Consultation Database is kept updated.	Graham Holland	Ongoing
Ensure Development Management are abreast of any legislative changes concerning when to consult statutory consultees	Martyn Leigh	Ongoing

Signature of Contract / Commissioning Manager	Date
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Graham Holland	2/11/2020
Signature of Assistant Director / Director	Date
Jeff Upton	2/11/2020