

ST HELENS BOROUGH COUNCIL

EQUALITY IMPACT ASSESSMENT TOOL

TO INFORM THE DEVELOPMENT OF DECISIONS OF
POLICY OR FUNCTION

St Helens Borough Council Equality Impact Assessment Tool
To assess proposed decision related to Council Policy and Statutory Functions

This document replaces: New.
Department of Origin: Corporate
Section: Policy, Change, & Reform
Author: Equality, Diversity, and Inclusion Officer
Post Holder (responsible for keeping Policy updated): Equality, Diversity, and Inclusion Officer
Related policies: St Helens Borough Council's Comprehensive Equality Policy
Date adopted by Senior Leadership Team: 14 March 2023
Date first published: 15 March 2023
Version: Version 2
Policy Review cycle: three years from first publication
Date of last update: NA

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EQUALITY IMPACT ASSESSMENT

- a. **EIA Lead Officer:** Sara Manson
Email address: saramanson@sthelens.gov.uk
Head of Service: Kieran Birch
Assistant Director: N/A
Director: Sean Traynor
Executive Director: Lisa Harris
Directorate: Place Services
Start Date: 09/08/23

What draft proposal is being assessed?

To consult on four draft Supplementary Planning Documents (SPDs)

- b. **Will the draft proposal be submitted through a decision-making process?**

Yes If 'yes' please state which decision-making route the proposal will take and, if being approved by a decision-making body, then please state which decision-making body and, when known, the meeting date

The draft proposals will ultimately go to a Cabinet meeting for adoption, after following the process which starts with Portfolio Holder approval for initial consultation, then Place DMT following consultation and any amendments, then Executive Management Board, and finally Cabinet.

- c. **Does your draft proposal cover Healthcare, Housing, or Education Function?**

No If yes then, in addition to completing this Equality Impact Assessment, you must also complete an Armed Forces Covenant Impact Assessment, which is a statutory requirement under the Armed Forces Act 2021. The Armed Forces Covenant Impact Assessment template and guidance can be accessed through this link [Armed Force Covenant Impact Assessment - Connect \(sthelens.gov.uk\)](https://www.sthelens.gov.uk/armed-forces-covenant-impact-assessment)

- d. **The draft proposal has the potential to affect**

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Service Users:	Council Workforce:	Borough Communities	Other	If other, please state	Strategic partners, businesses operating in the Borough, landowners and developers, etc.
Yes	Yes	Yes	Yes		

e. What stage has the EIA reached? [When beginning your EIA, please complete stages 1 and 2 \(on pages 5 & 6\) before completing this section](#)

This table provides a ‘cover note’ of progress and must be maintained as the EIA is developed over time.

Summary of current position Column: Please ensure you note the stage reached and any consultation or engagement carried out. Simple activities may not need all these stages. Any reports to senior managers during the development of the draft proposal, for example feasibility or options appraisal reports, should include content on the latest analysis and findings from the EIA, even though further development of the EIA may be required before it can fully inform the draft proposal, and receive the ‘sign off’ necessary to proceed through the decision-making processes.

NB Once the EIA Sign Off is completed, send the final version of the EIA to the Council’s EDI Officer for publication on the Council’s Website.

Stage	Date	Summary of current position
Stage 1: Setting out the Proposal: What are the elements of the proposal being assessed; including the main purpose and aims?	09/08/23	Stage 1 completed - Proposal to consult on the four draft SPDs.
Stage 2: Evidence gathering: identifying the target population and/or individuals likely to be affected by the proposal	09/08/23	At this current stage we have gathered as much evidence as possible about those people that the SPDs could potentially have an impact on, all of which are considered positive.
Stage 3: Engagement/Consultation: With groups and individuals likely to be affected	13/03/2024	Wednesday 20th December 2023 to Tuesday 30th January 2024. It should be noted that this consultation period went above and beyond the statutory minimum set out in the above legislation, which requires consultation for “not less than 4 weeks”.
Stage 4: Impact Assessment. Identify potential or actual discriminatory impact and mitigation	13/03/2024	No negative impact identified through the consultation.
Stage 5: Reporting the findings. Please set out the findings of the Impact Assessment and the Mitigation Action Plan.	13/03/2024	The SPDs will have a potential positive impact for our diverse community because they enlarge upon the Local

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Stage	Date	Summary of current position
		Plan's policies and strategic aims, which promote the design and development of an accessible, safe, and inclusive borough.
Stage 6: Sign-Off. Sign off by Senior Management, acknowledging that the EIA has been completed.	22/03/2024	Place DMT

Equality Impact Assessment Process

1 Setting out the Proposal.

What proposal is being assessed; including the title of the proposal, and the main purpose and aims; what is being proposed and why?

Supplementary Planning Documents (SPDs) are documents which build upon and provide more detailed advice or guidance on policies contained in an adopted Local Plan. Their purpose, once adopted, is to assist applicants when making planning applications, and Council Officers in determining them. They can provide further guidance for development on specific sites or on particular issues, such as open space, affordable housing and transport related issues. SPDs are capable of being a material consideration in planning decisions but are not part of the development plan.

Following the adoption of the St Helens Borough Local Plan up to 2037 (Local Plan), it was considered that a number of existing SPDs needed to be reviewed and new SPDs to be produced. There are a significant number of SPDs to be prepared, and to this end the preparation of new SPDs will be done in batches to reflect the available resources and the order in which they are prepared will reflect their level of priority.

Therefore, the following draft SPDs are the first 'batch' of SPDs to be prepared:

- **Design SPD** – This SPD provides a comprehensive guide to inspire and guide the delivery of high-quality development within the Borough. It provides further guidance and interpretation on how a high standard of design can be met and supplements the Local Plan's policies covering high quality design and measures to adapt to climate change.
- **Developer Contributions SPD** - Sets out St Helens Borough Council's approach to seeking developer contributions and is relevant to all development proposals (including residential, employment and retail). Its purpose is to outline the Council's approach to seeking contributions including the basis for requiring a contribution, viability testing and pre-application engagement requirements. It explains how specific contributions will be calculated, delivered, monitored, including consideration of future maintenance, management and retention in perpetuity of new infrastructure and facilities.
- **Open Space Provision and Enhancement SPD** – This SPD sets out St Helens Borough Council's approach to seeking high quality open spaces for new developments and to enhance existing open spaces through the Borough of St Helens. The document provides guidance for applicants including landowners and developers as well other stakeholders.
- **Transport and Travel SPD** – Builds upon policies set out in the Local Plan and provides consistent guidance to applicants on access and transport requirements for new developments and re-developments. It sets out the council's approach and expectations for new developments and re-developments in relation to walking, cycling, wheeling, public transport, ultra-low or zero emission vehicles, parking standards, freight management, air quality, noise and travel plans. It supersedes the 'Ensuring a Choice of Travel' (2010) SPD as well as 'Guidance Note for Travel Plans' (2016) and 'Guidance Notes for the Submission of Transport Assessments' (2016).

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In relation to the proposal being assessed, please set out the following
<p>What must the LA provide under statute? List all statutory duties and regulations relevant to the proposal.</p> <p>The requirements for producing SPDs are set out (at the current time) in Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).</p> <p>Prior to adoption a statutory 4-week consultation has to be undertaken.</p>
<p>Any discretionary element of provision or function? What elements of the proposal does the council have choice over?</p> <p>The Council has the choice, within the constraints of the National Planning Policy Framework (NPPF), to decide the content of Local Plans and other planning documents, such as SPD's.</p>
<p>What is currently provided?</p> <p>There are several SPDs (15) in effect in the Borough at the current time, covering a range of different issues, from shopfronts and travel to hot food takeaways and biodiversity. However, these are all approximately between 10 and 15 years old and were written in the context of the previous Local Plan and National Policy.</p>
<p>What could change as a result of the proposal and how could it change?</p> <p>Overall, the SPDs proposed expand upon existing policies in the Local Plan that have already been implemented and are currently being used by officers when making decisions on planning applications, and therefore should not affect these decisions. However, as they provide significantly more detail on their specific policy topic areas, they will support officers in making better informed decisions and give applicants clearer guidance on what is required. These changes will affect applications decided from the date of adoption of the SPDs onwards.</p>
<p>What is being consulted on?</p> <p>A public consultation will be undertaken on the draft SPDs early Autumn for a period of 6 weeks to gather feedback and comments on their content to inform their final adopted form.</p>

2 Evidence Gathering

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Who may or will be affected by the proposal? Put as much detail about the equality and diversity profile of the groups and individuals who share different protected characteristics affected or potentially affected by this proposal; updating the table as the EIA develops and the understanding of who will be affected emerges in more detail.

Include evidence from service user equality profiles, staff equality profiles, consultation, complaints, comparison, and other relevant data. Also include socio-economic profiles of the community and any relevant deprivation information.

The [Local Insight](#) 'Reports' section holds Ward, Locality, and Borough population profiles.

Evidence - Gather as much evidence and as much detail as possible to identify which groups of people or individuals who share different protected characteristics will potentially, or actually, be affected by the draft proposal / proposed changes.
Service Users
Workforce
Community
<p>The SPDs enlarge upon the Local Plan's policies that seek to meet its strategic aims which includes:</p> <p>1. Supporting Regeneration and Balanced Growth</p> <ul style="list-style-type: none"> 1.1 To promote regeneration by enabling steady and sustainable economic and population growth. 1.2 To reduce deprivation by ensuring that new development and investment can benefit deprived communities. 1.3 To help meet development needs by ensuring the efficient re-use of previously developed land. <p>2. Ensuring Quality Development</p> <ul style="list-style-type: none"> 2.1 To promote the creation of a well-designed environment by supporting proposals for high quality development. 2.2 To mitigate the effects and minimise the impacts of land use changes on climate change by requiring well designed developments in suitable locations. 2.3 To contribute to the development of stronger and safer communities by prioritising new development and investment that can benefit those who are disadvantaged.

Evidence - Gather as much evidence and as much detail as possible to identify which groups of people or individuals who share different protected characteristics will potentially, or actually, be affected by the draft proposal / proposed changes.

3. Promoting Sustainable Transport

3.1 To improve access for all by facilitating sustainable transport choices, development in accessible locations, an integrated public transport network, and targeted improvements to the transport network.

4. Meeting Housing Needs

4.1 *"To enable the delivery of sustainable communities by identifying land for a sufficient number and range of new dwellings."*

The Local Plan *"Policy LPD02: Design and Layout of New Housing"* includes various requirements which support wellbeing and community integration by policies that *"Preserve existing levels of amenity and meet minimum separation distances"*, *"Make it easy to find your way around"*, *"Have streets designed in a way that encourage low vehicle speeds, prioritise pedestrians and cyclists, and allow them to function as social spaces"* and *"Create safe and secure environments and reduce opportunities for crime and minimise the fear of crime."*

This is then enlarged upon by the **Design SPD** with guidance and requirements like the example below:

- 1.1 Purpose: The SPD will support the Council's six strategic priorities by providing a comprehensive guide to inspire and guide the delivery of high-quality development within the Borough. It will help shape the kind of places where people want to live, work and visit, by delivering more accessible, beautiful, and sustainable development and environments.
- 1.11 Engagement and Consultation: Community Engagement should be sought at the earliest opportunity in the design process to ensure that the development will meet the needs of the local community.
- 2.1.3. People:
 - Understand **who lives in the community** currently and whether there is a dominant group characterized by age, ethnic background, occupation etc.
 - Identify types of **community facilities** used by different socio-economic groups, and where there is need for additional services.
 - Where **under-represented groups** are identified, consider how it would benefit the community to provide for these groups.
 - **Consultation.** Establish aspirations and concerns of local communities. Undertake interviews and observation to understand how local people perceive the locality and use the site.

The **Open Space SPD** enlarges upon Local Plan Policy LPC05: Open Space and Policy LPD03: Open Space and Residential Development, with requirements such as:

"The Council will require new residential developments to follow the key principles which are set out below. That are aimed at achieving open spaces which are well designed, well located, well maintained, and accessible for all users to meet local needs.

1.Meeting local needs – providing for a range of different open space, sport and recreation facilities where required, to meet the needs generated by the development in the context of the existing local provision.

Evidence - Gather as much evidence and as much detail as possible to identify which groups of people or individuals who share different protected characteristics will potentially, or actually, be affected by the draft proposal / proposed changes.

2.Meeting the Borough's open space standards – the Council's open space standards, which accompany Policy LPC05, will be used to determine the nature and amount of new open space required (see Table 3). To ensure the standards are met across the Borough, the Council will seek to ensure that the Borough's network of open spaces is protected, managed, enhanced, and expanded, where appropriate.

3.High quality design – green open spaces should be high-quality, well-located, safe, well-designed, and attractive. They should be easily accessible and be able to be enjoyed by all people, regardless of visual and cognitive ability, mobility, or age.

4.Multi-functional benefits – creating multifunctional green spaces with potential benefits and uses for amenity, wildlife, local climate change resilience, flood control, water management, outdoor activity, food growing and social benefits.

5.Connectivity – providing enhanced connectivity to wider networks, such as the wildlife habitat network, cycling and walking network, green infrastructure networks, canals and waterways and water management systems.

6.Comprehensive provision and cumulative impact – developments that come forward as part of a larger multi- phase site should have regard to the total open space expected for the comprehensive development of the wider site and be designed accordingly. The cumulative effect of a number of phases may create the need for open space provision to serve the whole community of that specific new wider development.

7.Location – new open space should be provided on-site where existing provision in the area is insufficient. Off-site provision may be acceptable through a financial contribution where it is considered more appropriate to develop or enhance existing open space, sport or recreation facilities within the local area that are accessible from the new development.

8.Maintenance and Management – open spaces should be properly maintained and managed for continued use and enable them to serve their purpose.”

The **Transport and Travel SPD** enlarges upon Local Plan Policy LPA06: Transport and Travel, with requirements, guidance and objectives such as:

- Reduce the environmental impact of travel choices, by adopting a vision and validate approach to avoid inducing car demand and car dependency whilst improving the local environment;
- Reduce the level of traffic growth and congestion on the strategic and local road network; and
- Encourage opportunities to improve the quality of development proposals by better use of space through the provision of less car parking spaces where appropriate.
- Promote healthier lifestyles by providing opportunities for people to walk or cycle for work or leisure purposes;
- Create places that are safe, secure and attractive, minimising the scope for conflicts between pedestrians, cyclists and vehicles, avoiding unnecessary street clutter, and respond to local character and design standards;
- Address the needs of people with disabilities and reduced mobility in relation to all modes of transport

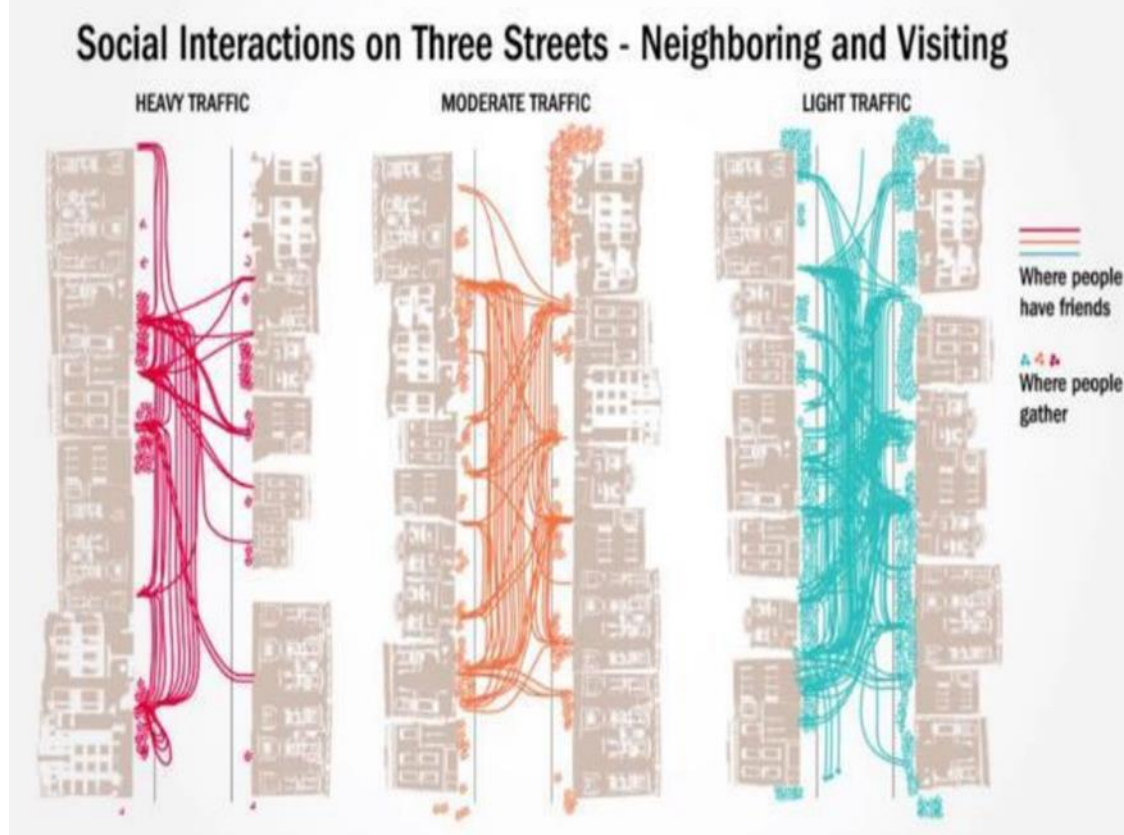
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- Deliver a reasonable choice of inclusive access to all modes of transport for new development with a prioritisation for cycling, walking and wheeling with access to high quality public transport;
- Enable delivery of supportive charging infrastructure for zero emission vehicles in safe, accessible and convenient locations;
- Allow for the efficient delivery of goods, and access by services and emergency vehicles
- Enable the provision of a balanced transport infrastructure which will provide access to employment training and learning, leisure, retail and other facilities for all residents and visitors;
- Improve road safety by adopting a Vision Zero approach”

The table below shows the impact of traffic levels on street interactions and how car dominance and heavy traffic leads to communities becoming more socially isolated by reducing the ability to interact with neighbours.

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Other

Protected Characteristic

What further data, research, or information is available about groups of people or individuals who share different protected characteristics, which is relevant to the EIA?

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Intersectional issues (i.e., for two or more characteristics)																
Age	<p>Supporting Data:</p> <p>The 2021 Census, records that there are 183,248 people living in St. Helens.</p> <table border="1" style="margin-left: 40px;"> <thead> <tr> <th style="background-color: #e0ffe0;">Census 2021 Age Group</th> <th style="background-color: #e0ffe0;">% Population</th> <th style="background-color: #e0ffe0;">Number</th> </tr> </thead> <tbody> <tr> <td>Aged 0-15</td> <td>17.8%</td> <td>32,676</td> </tr> <tr> <td>Aged 16-64</td> <td>61.6%</td> <td>112,930</td> </tr> <tr> <td>Aged 65+</td> <td>20.5%</td> <td>37,642</td> </tr> </tbody> </table> <p>There are 19,152 pensioner households in St Helens, or 23.6% of the total households (England average 22%).</p>	Census 2021 Age Group	% Population	Number	Aged 0-15	17.8%	32,676	Aged 16-64	61.6%	112,930	Aged 65+	20.5%	37,642			
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Race	<p>Supporting Data:</p> <p>The 2021 Census, records that there are 183,248 people living in St. Helens.</p> <table border="1" style="margin-left: 20px;"> <thead> <tr style="background-color: #d9e1f2;"> <th>Aggregated Ethnicity Profiles</th> <th>% Population</th> <th>Number</th> </tr> </thead> <tbody> <tr> <td>White British</td> <td>93.61%</td> <td>171,546</td> </tr> <tr> <td>White Minority Ethnicity</td> <td>2.92%</td> <td>5,342</td> </tr> <tr> <td>Other Minority Ethnicity</td> <td>3.47%</td> <td>6,360</td> </tr> </tbody> </table> <table border="1" style="margin-left: 20px;"> <thead> <tr style="background-color: #d9e1f2;"> <th>Census 2021 Ethnic Categories</th> <th>% Population</th> <th>Number</th> </tr> </thead> <tbody> <tr> <td>Asian, Asian British or Asian Welsh</td> <td>1.40%</td> <td>2,579</td> </tr> <tr style="background-color: #fff2cc;"> <td>Black, Black British, Black Welsh, Caribbean or African</td> <td>0.42%</td> <td>776</td> </tr> <tr> <td>Mixed/Multiple Ethnic Groups</td> <td>1.08%</td> <td>1,971</td> </tr> <tr style="background-color: #fff2cc;"> <td>White</td> <td>96.53%</td> <td>176,888</td> </tr> <tr> <td>Other Ethnic Groups</td> <td>0.57%</td> <td>1,034</td> </tr> </tbody> </table>	Aggregated Ethnicity Profiles	% Population	Number	White British	93.61%	171,546	White Minority Ethnicity	2.92%	5,342	Other Minority Ethnicity	3.47%	6,360	Census 2021 Ethnic Categories	% Population	Number	Asian, Asian British or Asian Welsh	1.40%	2,579	Black, Black British, Black Welsh, Caribbean or African	0.42%	776	Mixed/Multiple Ethnic Groups	1.08%	1,971	White	96.53%	176,888	Other Ethnic Groups	0.57%	1,034
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	Asian, Asian British or Asian Welsh	Bangladeshi	0.09%	172
		Chinese	0.36%	660
		Indian	0.30%	557
		Pakistani	0.13%	238
		Other Asian	0.52%	952
	Black, Black British, Black Welsh, Caribbean or African	African	0.30%	558
		Caribbean	0.06%	103
		Other Black	0.06%	115
	Mixed or Multiple ethnic groups	White and Asian	0.33%	597
		White and Black African	0.23%	417
		White and Black Caribbean	0.25%	446
		Other Mixed or Multiple ethnic groups	0.27%	491
	White	English, Welsh, Scottish, Northern Irish, or British	93.61%	171,546
		Irish	0.52%	945
		Gypsy or Irish Traveller	0.08%	145
		Roma	0.04%	67
		Other White	2.28%	4,185
	Other Ethnic Group	Arab	0.21%	377
		Any other ethnic group	0.36%	657
	Not specified	Not Specified	0.00%	0
Totals			100.00%	183,248

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Relevant Policies from the Local Plan that relate to Race include:

Local Plan Policy LPC03: Gypsies, Travellers and Travelling Showpeople

The 2004 Housing Act and the Government’s 2012 Planning Policy for Traveller Sites (PPTS) requires local authorities to assess Gypsy and Traveller and Travelling Showpeople accommodation needs and ensure steps are taken in meeting those needs, including through the allocation of sites in the Local Plan. The 2014 Merseyside and West Lancashire Gypsy & Traveller Accommodation Assessment (GTAA) used extensive fieldwork by interviewers (themselves from the Gypsy & Traveller community) to understand current and future housing need from the members of the Gypsy & Traveller Community living in caravans and in “*bricks and mortar*” houses.

The GTAA found that St Helens required 35 additional permanent pitches (8 net additional when turnover taken into account) up to 2033. This consisted of 6 in the period 2013/14 to 2017/18, 1 in the period 2018/19 to 2022/23 and an additional 2 in 2023/24 to 2032/33. This need changes each year as occupancy of sites alters, and pitches are gained and lost, and the current need in 2016 for the period up to 2017/18 is a net additional 16 pitches. For the entire plan period this would be a net additional of around 18 permanent pitches. The GTAA also found a need for 3 transit pitches (capable of taking 6 touring caravans) for Gypsies and Travellers for the period 2013/14 to 2032/33. The GTAA did not identify a need for accommodation for Travelling Showpeople.

Religion and Belief

Supporting Data:

Data from the 2021 Census sets out the following:

Census 2021 Category	% Population	Number
Buddhist	0.27%	501
Hindu	0.33%	597
Jewish	0.03%	63
Muslim	0.73%	1,340
Sikh	0.03%	54
Other Religions	0.36%	652
Christian	62.32%	114,200

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		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">No Religion</td> <td style="width: 25%; text-align: center;">31.21%</td> <td style="width: 25%; text-align: center;">57,184</td> </tr> <tr> <td>Religion Not Stated</td> <td style="text-align: center;">4.72%</td> <td style="text-align: center;">8,655</td> </tr> </table> <p>Minority Religion: 3,207 people declared they had a religion which is in a minority in the borough (Buddhist, Hindu, Jewish, Muslim, all other religions) made up 1.75% of the borough's population.</p>	No Religion	31.21%	57,184	Religion Not Stated	4.72%	8,655																					
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Sex	<p>Supporting Data: Data from the 2021 Census states:</p> <p>Female Sex: Women and Girls make up 50.9% of the Borough Population Male Sex: Men and Boys make up 49.1% of the Borough Population.</p>																												
Sexual Orientation	<p>Supporting Data: Data from the 2021 Census shows:</p> <ul style="list-style-type: none"> - LGB+ orientation: 4,065 people or 2.7% of the Borough population aged 16 years and over recorded an LGB+ orientation (“gay or lesbian”, “bisexual”, or “other sexual orientation”). <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr style="background-color: #fff3cd;"> <th style="text-align: left;">Census 2021 Category</th> <th style="text-align: center;">% Population</th> <th style="text-align: center;">Number</th> </tr> </thead> <tbody> <tr> <td>Straight or Heterosexual</td> <td style="text-align: center;">91.84%</td> <td style="text-align: center;">138,290</td> </tr> <tr> <td>Gay or Lesbian</td> <td style="text-align: center;">1.60%</td> <td style="text-align: center;">2,407</td> </tr> <tr> <td>Bisexual</td> <td style="text-align: center;">0.89%</td> <td style="text-align: center;">1,335</td> </tr> <tr> <td>Pansexual</td> <td style="text-align: center;">0.15%</td> <td style="text-align: center;">227</td> </tr> <tr> <td>Asexual</td> <td style="text-align: center;">0.05%</td> <td style="text-align: center;">71</td> </tr> <tr> <td>Queer</td> <td style="text-align: center;">0.00%</td> <td style="text-align: center;">7</td> </tr> <tr> <td>All other sexual orientations</td> <td style="text-align: center;">0.01%</td> <td style="text-align: center;">18</td> </tr> <tr> <td>Not answered</td> <td style="text-align: center;">5.46%</td> <td style="text-align: center;">8,217</td> </tr> </tbody> </table>		Census 2021 Category	% Population	Number	Straight or Heterosexual	91.84%	138,290	Gay or Lesbian	1.60%	2,407	Bisexual	0.89%	1,335	Pansexual	0.15%	227	Asexual	0.05%	71	Queer	0.00%	7	All other sexual orientations	0.01%	18	Not answered	5.46%	8,217
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Socio Economic Disadvantage	<p>Supporting Data:</p>																												

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Evidence - Gather as much evidence and as much detail as possible to identify which groups of people or individuals who share different protected characteristics will potentially, or actually, be affected by the draft proposal / proposed changes.

- 7,985 children aged 0-19 (20%) are in relative low-income families in St Helens compared with 20% across England
- The 2019 Index of Multiple Deprivation Fort the Borough as a whole:

Local Authority Rank



Local Authority Score



LSOA proportion in first decile (rank)



Deprivation Domains

- 47 Income Rank
- 11 Employment Rank
- 94 Education, Skills & Training Rank
- 10 Health & Disability Rank
- 86 Crime Rank
- 155 Living Environment Rank
- 302 Barriers to Housing & Services
- 54 IDACI Rank
- 80 IDAOPi Rank

- From the Borough Profile:

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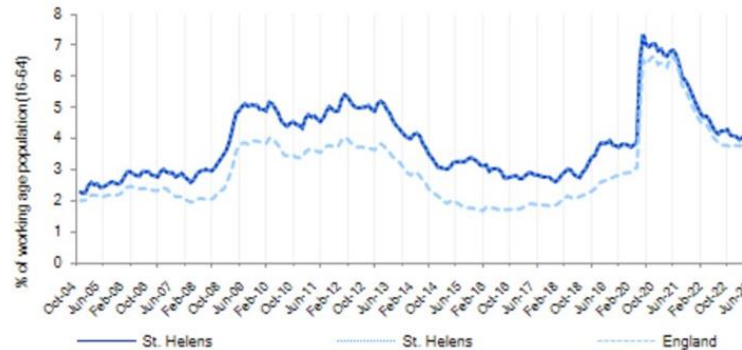
Unemployment Benefit (JSA and UC) claimants (Jun-23) 4,420 4.0% (England average = 3.8%)	Youth unemployment (JSA/UC) claimants aged 18-24 (Jun-23) 1,005 7.8% (England average = 4.9%)	Older unemployed (JSA/UC claimants aged 50+) (Jun-23) 910 1.2% (England average = 1.5%)	Male unemployment claimants (JSA and UC) (Jun-23) 2,685 4.9% (England average = 4.4%)	Female unemployment claimants (JSA and UC) (Jun-23) 1,715 3.1% (England average = 3.3%)	Working age workless benefit claimants * (Nov-22) 11,814 10.7% (England average = 7.9%)	Incapacity benefits claimants (Nov-22) 7,234 6.5% (England average = 3.9%)
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Source: Department for Work and Pensions

* 'Working age workless benefit claimants' is a combination of 'Unemployment benefit claimants (JSA and Universal Credit)' + and 'Incapacity benefits claimants (IB/ESA)'

Figure: Unemployment benefit (Jobseekers Allowance/Universal Credit) claimants

Source: Department for Work and Pensions



Relevant Policies from the SPDs:

From the Developer contributions SPD:

- "1.8 Developer Contributions are used for three purposes:
 - To prescribe the nature of development (for example, requiring a given portion of housing is affordable);
 - To compensate for loss or harm created by a development (for example, loss of open space); and

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	<ul style="list-style-type: none"> • To mitigate a development's impact (for example, through increased public transport provision)." - "2.4 Developer contributions will be sought where a development would otherwise be unacceptable, and the objections cannot be overcome by conditions. They will be negotiated on a site-by-site basis. Planning obligations will typically address, but are not limited to, issues such as: <ul style="list-style-type: none"> ▪ Affordable housing ▪ Public Open Space ▪ Transport ▪ Social infrastructure, including education and healthcare."

3. Engagement/Consultation: The decision about who to engage with, and how and when to engage, is the key to effective Equality Impact Assessment. Engagement must be conducted in line with (i) any statutory consultation requirements, and (ii) the Council's [Consultation Code](#)

Is engagement or consultation required, now or during the further development of the draft proposal? **Yes**

If No, then provide a summary of the reason why you have reached this conclusion in the box below. Then move onto Stage 4. Impact Assessment.

If Yes, then please continue with this section

Planning your engagement / consultation

Does the evidence in Stage 2, show that the draft proposal:

- | | |
|---|----|
| • Will result in any groups of people who share a Protected Characteristic being treated differently from other people? | No |
| • Will the differential treatment advance equality for people with Protected Characteristics? | No |
| • Will the differential treatment cause or increase disadvantage for people with Protected Characteristics? | No |

If yes, please state which groups and how? Use this information to inform questions in your consultation or engagement

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Consultation and Engagement Findings (Duplicate for each engagement activity)

Dates of Consultation: Statutory Consultation commenced Wednesday 20 th December 2023 to Tuesday 30 th January 2024.	
Summary of the engagement / consultation activity carried out – include what aspects of the proposed decision were consulted on, list any questions relevant to the Equality Impact Assessment (in space below)	
<p>In accordance with Regulation 12 of The Town and Country (Local Planning) (England) Regulations 2012, and the Council’s adopted Statement of Community Involvement, the Council carried out a 6-week statutory consultation on all four draft SPDs that ran from Wednesday 20th December 2023 to Tuesday 30th January 2024. It should be noted that this consultation period went above and beyond the statutory minimum set out in the above legislation, which requires consultation for “not less than 4 weeks”.</p> <p>The Council notified all statutory consultees (including Parish Councils, Ward Councillors, neighbouring authorities and members of the public, agents, developers and organisations contained on the Planning Policy Consultation Database) about the consultation.</p> <p>The consultation was available to view online on the Council’s website https://www.sthelens.gov.uk/article/3774/Plans-under-preparation and the Council’s Communications Team posted articles on the Council’s various social media outlets. Comments were invited in writing to be sent either via email or by post.</p> <p>Prior to the public consultation, the Planning Policy Team liaised with various internal Council departments, including Development Control, Open Space, Highways and Legal Services. Informal consultation was also undertaken with the Lead Local Flood Authority (drainage), Education, Nature Conservation, Housing and the Integrated Care Boards (healthcare).</p>	
Protected characteristic	Summarise the equality impacts identified through the engagement and detail any suggestions on how to avoid, minimise, or mitigate discriminatory or potentially discriminatory impact
Intersectional issues (i.e., for two or more characteristics)	N/A
Age	N/A
Disability	N/A
Gender Reassignment	N/A
Marriage and Civil Partnership	N/A

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Dates of Consultation: Statutory Consultation commenced Wednesday 20 th December 2023 to Tuesday 30 th January 2024.	
Pregnancy and Maternity	N/A
Race	N/A
Religion and Belief	N/A
Sex	N/A
Sexual Orientation	N/A
Socio Economic Disadvantage	N/A

Engagement Findings: Drawing on the engagement findings and your understanding of the effects of the draft proposal, indicate how the draft proposal will contribute, if at all, to the three strands of the Public Sector Equality Duty (PSED).	
PSED Strand	How will the proposed decision contribute to this strand?
Eliminate Discrimination, Harassment and Victimisation	N/A
Advance Equality of Opportunity	N/A
Foster Good Community Relations	N/A

4. Impact Assessment

Use this table to record the potential or actual impact of the draft proposal using the evidence and outcomes of consultation, assess the impact for people who share different protected characteristics, identifying:

- Potential or actual discriminatory impact
- Mitigation for each potential or actual discriminatory impact
- Potential or actual positive impact within the proposal to enhance equality of opportunity or community cohesion.

Add more rows as required, especially if there is more than one impact identified for a protected characteristic.

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For the Column, **Potential or Actual Impact** - for each row put either Positive, Negative or Not Applicable (NA). Do not leave blank.

For the Column, **Level of Impact** – for each row put either Low, Medium, High, or None depending on analysis. Do not leave blank.

Protected Characteristic	Potential or Actual Impact	Level of Impact	Summary of Impact	Action or Mitigation Required
Intersectional (on two or more characteristics)	Potential Positive Impact	High	The SPDs will have a potential positive impact for our diverse community because they enlarge upon the adopted policies and strategic aims of the St Helens Borough Local Plan up to 2037, which promote the design and development of an accessible, safe, and inclusive borough.	N/A
Age	As above	As above	As above	
Disability	As above	As above	As above	
Gender Reassignment	As above	As above	As above	
Marriage and Civil Partnership	As above	As above	As above	
Pregnancy and Maternity	As above	As above	As above	
Race	As above	As above	As above	
Religion and Belief	As above	As above	As above	
Sex	As above	As above	As above	
Sexual Orientation	As above	As above	As above	
Socio Economic Disadvantage	As above	As above	As above	

5. Reporting the findings and Mitigation Action Plan

The findings of the EIA may be reported to senior managers and the decision-making body / decision maker, at several stages during the development of a draft proposal. For example, the impact assessment may inform a feasibility report, or options appraisal, which may need to be considered by the Senior Leaders, Portfolio Holders, or Partnership Boards, before the proposal is ready for final approval.

Any reports linked to the Draft Proposal, which are going through formal decision-making processes, such as Delegated, Committee, Cabinet, or Full Council, must include the latest findings of the EIA, even if these are at a relatively early stage.

The report recommending final approval of the proposal, must await and be fully informed by the findings of the completed EIA. If there are any alterations or changes to the nature of the proposal, as a result of its progress through the Council's decision-making processes, then a further Equality Impact Assessment must be carried out on those changes or amendments, before the final decision on the proposal can be considered for approval by the decision-making body.

This is because the decision-making body has a legal requirement, when making a decision, to do so in the full knowledge of the equality implications of that decision, at the point when the decision is made. The final approval report must include:

- A summary of the EIA findings, stating clearly (i) the equality implications, (ii) all potential or actual discriminatory outcomes, and (iii) actions that will be taken to avoid, minimise, or mitigate those potential or actual discriminatory outcomes.
 - For a DED the EIA summary must be included under "Other implications" in the section "Has Equality and Human Rights Implications."
 - For a Cabinet Report the EIA summary must be included under Section 12 Equality and Human Rights.
- The Equality Impact Assessment must be attached as an appendix to the Cabinet Report, and in the "Equality" section of the DED.

NB. The report recommending final approval of the proposal, may include recommendations based on the findings of the EIA, but these should be separate from the reporting of impacts. Recommendations will be developed separately from the EIA and arise from Senior Managers considering equality impacts combined with other aspects of the proposal, such as finance, the wider benefits of the proposal, and so on.

Equality Impact Assessment Mitigation Action Plan

Any actions to mitigate (avoid, minimise, lessen, or remove), actual or potential discriminatory impact, identified in this Equality Impact Assessment, must be listed below, to complete the full EIA.

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Potential negative impact	Action required to mitigate the potential negative impact	Lead person	Timescale	Resource implications
N/A				

EIA and EIA Mitigation Action Plan Review Arrangements	
Date of the next review of the EIA	N/A
How often will the EIA Action Plan be reviewed?	This is a one-off document.
Who will carry out this review?	