

Equality Impact Analysis

This equality impact analysis establishes the likely effects both positive and negative and potential unintended consequences that decisions, policies, projects and practices can have on people at risk of discrimination, harassment and victimisation. The analysis considers documentary evidence, data and information from stakeholder engagement/consultation to manage risk and to understand the actual or potential effect of activity, including both positive and adverse impacts, on those affected by the activity being considered.

To support completion of this analysis tool, please refer to the equality impact analysis guidance.

Section 1 – Analysis Details (Page 5 of the guidance document)

Name of Policy/Project/Decision	Draft Elton Reservoir Development Framework Supplementary Planning Document
Lead Officer (SRO or Assistant Director/Director)	Cris Logue
Department/Team	Business, Growth and Infrastructure
Proposed Implementation Date	24 th October 2025
Author of the EqlA	Fran Smith
Date of the EqlA	16th October 2025

1.1 What is the main purpose of the proposed policy/project/decision and intended outcomes?

Draft Elton Reservoir Development Framework (ERDF) Supplementary Planning Document (SPD) supports Policy JPA7 of the Places for Everyone Joint Plan (PfE) which was adopted in March 2024.

The draft ERDF establishes the key principles for the development of the Elton Reservoir site and establishes a framework against which future planning applications on the site will be considered, sets out high level design principles and an approach to the delivery and phasing of infrastructure. In order to give the Framework additional planning weight in decision making, it is proposed that it is adopted as a Supplementary Planning Document (SPD).

The ERDF provides a clear vision for the delivery of the Elton Reservoir site. However, if circumstances change and have implications for the vision, design and development principles set out in the ERDF, then a review of this document will be appropriate.

It is proposed that the draft SPD is subject to at least a six-week period of consultation in order to establish stakeholder views on its content.

Section 2 – Impact Assessment (Pages 6 to 10 of the guidance document)

2.1 Who could the proposed policy/project/decision likely have an impact on?

Employees: No. The Elton Reservoir SPD will not affect any employees based on a protected characteristic(s) they have. Staff will be guided in their work, in line with national guidance and the council's strategic aims, enabling them to provide the public with the best possible level of service.

Community/Residents: **Yes.** A key part of the PfE, including the Elton Reservoir site, is to rebalance the Greater Manchester economy by significantly boosting the economic output from the north through the delivery of new housing and employment that will benefit both Bury and its residents.

Third parties such as suppliers, providers and voluntary organisations: **Yes** – PfE and the Elton Reservoir SPD will provide careful and detailed advice towards ensuring high quality development within the Elton Reservoir allocation.

If the answer to all three questions is 'no' there is no need to continue with this analysis.

2.2 Evidence to support the analysis. Include documentary evidence, data and stakeholder information/consultation

Documentary Evidence:

PfE has been subject to an Integrated Assessment (which included an Equality Impact Assessment) and this can be viewed at [mdc8-appendix-a-eqia-2023.pdf](#)

Data:

Places for Everyone has already been through the Equality Impacts Assessment (EqIA) process at the relevant stages of development. The SPD expands on policies within Places for Everyone which has already been through the Sustainability Appraisal (SA) process at various stages of its development, where identified social, economic and environmental considerations have been established and assessed as part of the plan making process.

In addition to the SA, Places for Everyone is also supported by a robust and extensive evidence base, that has been tested through the examination process by independent Planning Inspectors.

Given the above, the most relevant information at this stage is the extensive range of evidence used in support of the development and examination of Places for Everyone, available to view at [Places for Everyone Joint Development Plan and supporting evidence](#)

Stakeholder information/consultation:

The SPD will be subject to at least a six-week public consultation prior to adoption. Full consideration will be given to all the responses received as part of the consultation exercise. Amendments to the draft SPD will be made where necessary. Outcomes from the public engagement will be set out within a Consultation Statement.

Ongoing dialogue has been carried out with internal officers and stakeholders throughout the preparation process for the draft SPD and no issues concerning equality and community cohesion have been raised as a result of these consultations. It is proposed that, following the public consultation, a further version of the Elton Reservoir SPD will be brought back to Cabinet for formal approval.

If a review of the ERDF is appropriate, the scope and content of the updated SPD would be subject to a proportionate statutory and/or public/stakeholder consultation prior to being finalised. This EqIA would be updated to reflect any amendments to the ERDF.

It is anticipated that it could take up to 18 years to deliver the Elton Reservoir site. The ERDF provides a high-level strategy and key principles for the delivery of Elton Reservoir, whilst retaining flexibility to allow for opportunities across the site. Information

and associated impacts of delivering individual parcels of development within the site will be considered at planning application stage.

2.3 Consider the following questions in terms of who the policy/project/decision could potentially have an impact on. Detail these in the impact assessment table (2.4) and the potential impact this could have.

- Could the proposal prevent the promotion of equality of opportunity or good relations between different equality groups?
- Could the proposal create barriers to accessing a service or obtaining employment because of a protected characteristic?
- Could the proposal affect the usage or experience of a service because of a protected characteristic?
- Could a protected characteristic be disproportionately advantaged or disadvantaged by the proposal?
- Could the proposal make it more or less likely that a protected characteristic will be at risk of harassment or victimisation?
- Could the proposal affect public attitudes towards a protected characteristic (e.g. by increasing or reducing their presence in the community)?
- Could the proposal prevent or limit a protected characteristic contributing to the democratic running of the council?

2.4 Characteristic	Potential Impacts	Evidence (from 2.2) to demonstrate this impact	Mitigations to reduce negative impact	Impact level with mitigations Positive, Neutral, Negative
Age	Different age groups have different housing and employment needs, which directly impact on how and when they choose to live.	The SPD includes proposals that will bring positive housing benefits to the young and old. As of 31 March 2024, there were 2,211 households on the housing register seeking affordable housing in the Borough and PfE requires development in the Elton Reservoir allocation to include affordable housing provision within which will help younger, first-time	The SPD is intended to apply to all age groups. It supports the provision for a range of housing including extra care and supportive living. Social uses such as retail, health, education facilities and public transport hubs are to be co-located to ensure	Neutral

		buyers get onto the property ladder. In addition, recent population projections indicate that there is likely to be a significant increase in the number of people aged over-65. The Housing Need and Demand Assessment (2020) estimates that there will be a need for an additional 578 units of specialist older person (planning use class C3) and 518 units of residential care (use class C2) from 2020-2037. There is expected to be an increase of around 403 dwellings needing major adaptation by 2030 to meet the needs of people illness or disability. This population changes are likely to present some challenges in terms of ensuring specific housing and care requirements of these groups can be met, and sufficient accommodation will have to be delivered to meet these needs. The SPD includes provision of a retirement village for older people, maximising their ability to live independent lives and retain control over their accommodation and services.	that all ages groups can access.	
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		Public consultation methods will be designed to ensure all ages groups are engaged for example the use of leaflets, social media and drop in events.		
Disability	Different disability groups have different housing and employment needs, which directly impact on how and when they choose to live.	The SPD includes proposals that will bring positive housing benefits to all disabled groups The Housing Need and Demand Assessment (2020) estimates that there will be a need for an additional 578 units of specialist older person (planning use class C3) and 518 units of residential care (use class C2) from 2020-2037. There is expected to be an increase of around 403 dwellings needing major adaptation by 2030 to meet the needs of people illness or disability. This population changes are likely to present some challenges in terms of ensuring specific housing and care requirements of these groups can be met, and sufficient accommodation will have to be delivered to meet these needs. The SPD includes provision of extra care accommodation, maximising residents ability to live independent lives and retain control over their accommodation and services.	The SPD is intended to apply to all disability groups. It supports the provision for a range of housing including extra care and supportive living. Social uses such as retail, health, education facilities and public transport hubs are to be co-located to ensure that all disabled groups can access.	Neutral

		Additional requirements and guidance on design within the Elton Reservoir allocation should ensure improved access for less mobile people. Public consultation methods will be designed to ensure that key stakeholders, community groups and residents are engaged to ensure an inclusive approach.		
Gender Reassignment		There is no evidence that there will be a differential impact based on gender reassignment.		Neutral
Marriage and Civil Partnership		There is no evidence that there will be a differential impact based on marital or civil partnership status.		Neutral
Pregnancy and Maternity	Neutral	See above		
Race		There is no evidence that there will be a differential impact based on Race.		Neutral
Religion and Belief		There is no evidence that there will be a differential impact based on Religion on Belief.		Neutral
Sex		There is no evidence that there will be a differential impact based on the sex of a person.		Neutral
Sexual Orientation		There is no evidence that there will be a differential impact based on the sex orientation of a person.		Neutral

Carers		There is no evidence that there will be a differential impact for carers.		Neutral
Looked After Children and Care Leavers	Looked after children and care leavers may not be able to access open market housing	As of 31 March 2024, there were 2,211 households on the housing register seeking affordable housing in the Borough and the Plan includes a policy	PfE includes a policy requiring affordable housing provision within new residential development which will help younger, first-time buyers and socio-economically vulnerable residents get onto the property ladder. Development in the Elton Reservoir allocation will include affordable housing in line with PfE.	Neutral
Socio-economically vulnerable	Socio-economically vulnerable residents may not be able to access open market housing.	As of 31 March 2024, there were 2,211 households on the housing register seeking affordable housing in the Borough and the Plan includes a policy	PfE includes a policy requiring affordable housing provision within new residential development which will help younger, first-time buyers and socio-economically vulnerable residents get onto the property ladder. Development in the Elton Reservoir allocation will include affordable housing in line with PfE.	

Veterans		There is no evidence that there will be a differential impact on Veterans.		Neutral
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Actions required to mitigate/reduce/eliminate negative impacts or to complete the analysis

2.5 Characteristics	Action	Action Owner	Completion Date
	EqIA to be updated following consultation to reflect the results of the consultation	Fran Smith	

Section 3 - Impact Risk

Establish the level of risk to people and organisations arising from identified impacts, with additional actions completed to mitigate/reduce/eliminate negative impacts.

3.1 Identifying risk level (Pages 10 - 12 of the guidance document)

Impact x Likelihood = Score			Likelihood			
			1	2	3	4
			Unlikely	Possible	Likely	Very likely
Impact	4	Very High	4	8	12	16
	3	High	3	6	9	12
	2	Medium	2	4	6	8

1	Low	1	2	3	4
0	Positive / No impact	0	0	0	0

Risk Level	No Risk = 0	Low Risk = 1 - 4	Medium Risk = 5 – 7	High Risk = 8 - 16
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3.2 Level of risk identified	0
3.3 Reasons for risk level calculation	Equalities impacts identified are all positive or will not affect other groups of people with protected characteristics. The type of development outlined in the document will benefit groups with protected characteristics including age and disability. Other groups with protected characteristics will not be negatively impacted by the SPD.

Section 4 - Analysis Decision (Page 11 of the guidance document)

4.1 Analysis Decision	X	Reasons for This Decision
There is no negative impact therefore the activity will proceed	X	
There are low impacts or risks identified which can be mitigated or managed to reduce the risks and activity will proceed		
There are medium to high risks identified which cannot be mitigated following careful and thorough consideration. The activity will proceed with caution and this risk recorded on the risk register, ensuring continual review		

Section 5 – Sign Off and Revisions (Page 11 of the guidance document)

5.1 Sign Off	Name	Date	Comments
Lead Officer/SRO/Project Manager	Fran Smith	16/10/2025	

Responsible Asst. Director/Director	Cris Logue	16/10/2025	
EDI	L.Cawley	11/12/2025	QA Complete: The analysis has identified potential impacts across some characteristics which will require consideration of mitigations as the development progresses. The EqlA will require update and revision as this development progresses

EqlA Revision Log

5.2 Revision Date	Revision By	Revision Details
		This EqlA will be continually reviewed and updated as the ERDF develops. Further information will be considered at planning application stage in terms of the delivery of individual parcels of development.