

# Equality Analysis Toolkit

## Lancashire Local Flood Risk Management Strategy 2021-2027



Blackburn with  
Darwen Council

Blackpool Council



# Question 1 - What is the nature of and are the key components of the proposal being presented?

The report to Executive seeks approval of the Lancashire Local Flood Risk Management Strategy 2021 - 2027 (the Local Strategy) and associated documents listed below to ultimately discharge its statutory duty under Section 9 of the Flood and Water Management Act (2010) (FWMA) to produce a Local Flood Risk Management Strategy that is updated and monitored.

In addition to the Local Strategy, the proposal is also for the approval of associated documents including:

- Non-technical Summary of the Local Strategy (covering the key points of the Local Strategy)
- Consultation Report on the Public Consultation of the Local Strategy
- Strategic Environmental Assessment (SEA)
- Habitats Regulations Assessment (HRA)

The previous Local Strategy was adopted in 2014. Now that the new National Flood and Coastal Erosion Risk Management (FCERM) Strategy (the National Strategy) has been published by the Environment Agency in September 2020, Lead Local Flood Authorities are required to update their Local Strategies to ensure they are consistent with the National Strategy in accordance with Section 9(5) of the FWMA 2010.

The revised Local Strategy is a joint document produced by Blackpool, Blackburn-with-Darwen and Lancashire County Councils as the Lead Local Flood Authorities (LLFAs) across Lancashire. It is proposed that the Local Strategy will be published on all three Council websites so our residents can easily find it, but that publication on our websites will not happen until all three Councils have granted approval of the Local Strategy.

The Lancashire Local Flood Risk Management Strategy 2021 - 2027 proposed for approval is the publication version. An earlier consultation version underwent a five-week public consultation, the feedback from this can be found in the Consultation Report. The publication version has been amended to take account of this feedback and is therefore not subject to further amendment.

## Question 2 - Scope of the Proposal

Is the proposal likely to affect people across the county in a similar way or are specific areas likely to be affected – e.g. are a set number of branches/sites to be affected?

The Local Strategy aims to impact positively on everyone who lives and/or works in Lancashire, regardless of age, disability, sex/gender, gender identity/ reassignment, race, ethnic background, religion or belief, sexual orientation, pregnancy and maternity, marital status or civil partnership, or employment and/or education status.

This will also extend to those (with or without protected characteristics) who are visiting, passing through or temporarily located in Lancashire for whatever purpose

# Question 3 – Protected Characteristics Potentially Affected

Could the proposal have a particular impact on any group of individuals sharing protected characteristics under the Equality Act 2010, namely:

- Age
- Disability including Deaf people
- Gender reassignment
- Pregnancy and maternity
- Race/ethnicity/nationality
- Religion or belief
- Sex/gender
- Sexual orientation
- Marriage or Civil Partnership Status

And what information is available about these groups in the County's population or as service users/customers?

Specific projects that are raised within the LFRMS will not be subject to an EIA at this point but will be addressed appropriately at a project level.

With regards to groups with protected characteristics:

**Age** – Additional consideration may be identified to ensure this group is not disadvantaged.

**Disability, including deaf people** - Additional consideration may be identified to ensure these groups are not disadvantaged.

**Gender reassignment/gender identity** - No separate consultation or consideration identified at present.

**Race/ethnicity/nationality** - Additional consideration may be identified to ensure these groups are not disadvantaged.

**Sex/gender** - No separate consideration identified at present.

**Pregnancy or maternity** - No separate consideration identified at present.

**Religion or belief** - No separate consideration identified at present.

**Sexual orientation** - No separate consideration identified at present.

Marriage or civil partnership status (in respect of which the s.149 requires only that due regard be paid to the need to eliminate discrimination, harassment or victimisation or other conduct prohibited by the Act) - No separate consideration identified at present.

# Question 4 – Engagement/ Consultation

How have people/groups been involved in or engaged with in developing this proposal?

The Lancashire Local Flood Risk Management Strategy 2021 – 2027, and associated documents, has been lead by Blackpool Council and developed by officers in Blackpool, Blackburn-with-Darwen and Lancashire County Councils.

Five-week public consultation sought engagement and views from all groups in society.

Stakeholders were also consulted, including Councillors, district councils, town/parish councils, Environment Agency, Natural England, English Heritage, Earby and Salterforth Internal Drainage Board, United Utilities, Yorkshire Water, North West and Yorkshire Regional Flood and Coastal Committees, National Farmers Union, Network Rail, British Waterways, Lancashire Wildlife Trust, Rivers Trusts, Flood Action Groups (for which we have contact details) and other involved or interested parties.

A total of 175 consultation responses were received to the 5 week public consultation. Feedback has been collated, analysed and incorporated appropriately.

# Question 5 – Analysing Impact

Could this proposal potentially disadvantage particular groups sharing protected characteristics and if so which groups and in what way? This pays particular attention to the general aims of the Public Sector Equality Duty:

- To eliminate unlawful discrimination, harassment or victimisation because of protected characteristics;
- To advance equality of opportunity for those who share protected characteristics;
- To encourage people who share a relevant protected characteristic to participate in public life;
- To contribute to fostering good relations between those who share a relevant protected characteristic and those who do not/community cohesion;

**Age** – This group includes those who are digitally excluded and is more likely to be over-represented amongst older people. There may be potential issues with receiving notice of the publication of the Local Strategy, particularly if only published using social media and other electronic means. It is important to ensure that the method of communication is appropriate to the groups potentially affected and this will be reflected in the Launch Plan for the consultation which is in development.

**Disability (including deaf people)** – There could be a range of disabled people who require alternative formats including those who are visually impaired, people who have learning disabilities and the deaf community whose first language is often British Sign Language and not English. It is important to ensure that the method of communication is appropriate and accessible versions of the Local Strategy are available to these groups.

The non-technical summary document will provide a shorter version of the key aspects of the Local Strategy and should help ensure the document is accessible to all groups.

For blind, partially sighted/visually impaired people a basic plain text, large print black and white version of the Strategy and the Non-Technical Summary will be made available online. Diagrams and information boxes in this version will be minimised and/or removed.

Blackpool Council will provide an Easy Read version of the Strategy, and the Non-Technical Summary will also be available in Braille upon request.

For deaf and hard of hearing people, a British Sign Language or subtitled video about the Strategy could be made available online as part of any launch materials to ensure any such material is accessible to all groups.

**Race/ethnicity/nationality** – Potential issue with ability to understand and read the Strategy, particularly if English is not a first language. It is important to ensure that the method of communication is appropriate to the groups potentially affected, by ensuring a copy of the document is available in another language upon request.

**Sex/gender** – No negative impacts expected.

**Gender reassignment/gender identity** – No negative impacts expected.

**Religion or belief** – No negative impacts expected.

**Sexual orientation** – No negative impacts expected.

**Pregnancy or being on maternity leave** – No negative impacts expected.

**Marriage or civil partnership status (in respect of which the s. 149 requires only that due regard be paid to the need to eliminate discrimination, harassment or victimisation or other conduct prohibited by the Act)** – No negative impacts expected.

**Having young children** – No negative impacts expected.

**Living in an area of deprivation** – No negative impacts expected.

**Living in a rural area** – No negative impacts expected.

**Children looked after** – No negative impacts expected.

**Teenage parents** – No negative impacts expected.

**Carers** – No negative impacts expected.

**Offenders, people out of work, problem drug users etc.** – No negative impacts expected.

# Question 6 – Combined/Cumulative Effect

Could the effects of this proposal combine with other factors or decisions taken at local or national level to exacerbate the impact on any groups?

No.

However, Blackpool Council recognises that flooding and flood risk may be high in the minds of the public due to local events and experiences over recent years.

The public consultation generated significant interest and number of responses from our communities and stakeholders. We therefore anticipate publication of the Local Strategy will also generate interest. The Launch Plan will ensure we work closely with Corporate Communications to ensure the Local Strategy is visible and accessible to all groups as outlined in this assessment.

# Question 7 – Identifying Initial Results of Your Analysis

As a result of the analysis has the original proposal been changed/amended, if so please describe.

No - The Local Strategy has not been changed or amended.

However, it is noted that publication of the Strategy and its associated documents will need to be give further consideration to accessibility - see Question 8 for detail.

# Question 8 - Mitigation

Will any steps be taken to mitigate/reduce any potential adverse effects of the proposal?

The Launch Plan for the publication of the Local Strategy will need to ensure that:

- It gives due consideration to those that are digitally excluded and/or who find using technology more difficult to ensure they have access to publication announcements and materials.
- It gives due consideration to providing accessible copies of the Local Strategy upon request, as outlined in Section 5 of this assessment.

# Question 9 – Balancing the Proposal/Countervailing Factors

This weighs up the reasons for the proposal – e.g. need for budget savings; damaging effects of not taking forward the proposal at this time – against the findings of the analysis.

The proposal is to seek approval and publication of the new Local Flood Risk Management Strategy 2021-2027 for Lancashire to fulfil our duty under Section 9 of the Flood and Water Management Act 2010.

The requirement under the Act is to ‘develop, maintain, apply and monitor’ the Local Strategy and to ‘publish a summary of the Local Flood Risk Management Strategy’.

It is therefore necessary to proceed with publication of the Local Strategy and associated documents, in accordance with Section 9 of the Act, whilst ensuring appropriate adjustments and considerations are made as outlined in this document.

# Question 10 – Final Proposal

In summary, what is the final proposal and which groups may be affected and how?

The final proposal is to seek the approval and publication of the Lancashire Local Flood Risk Management Strategy 2021 – 2027 and its associated documents outlined in this document.

Whilst the consultation will be of interest to and affect all electoral divisions, there is a clear need to ensure that the groups who have the potential to be affected (age, disability and race/ethnicity/nationality) are appropriately considered and measures put in place to ensure they can equally access the Local Strategy documentation should they so wish.

# Question 11 – Review and Monitoring Arrangements

What arrangements will be put in place to review and monitor the effects of this proposal?

There will be:

- A direct contact published on the webpage to enable groups affected to get in touch to request further support.
- Non-web based publication materials provided under Launch Plan.
- Non-technical summary of the Strategy published alongside the full Strategy document.
- Further EIA undertaken at a project level as appropriate.

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