

Equality Impact Assessment / Equality Analysis

Title of service or policy	The variation of the Bath Clean Air Zone Charging Order to implement a proposed charge for Euro VI diesel HGVs exceeding 12 tonnes (known as N3 vehicles) in Bath and North East Somerset
Team	Delivery and Transformation
Officer leading the completion of the EquIA	Cathryn Brown, CAZ Manager
Date of assessment	November 2022

The Public Sector Equality Duty (Section 149 of the Equality Act 2010) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people carrying out their activities.

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The primary concern is to identify any discriminatory or negative consequences for a particular group or sector of the community and help the Council to better understand the potential impact of any proposals and consider mitigating actions. Equality Impact Assessments (EquIAs) can be carried out in relation to service delivery as well as employment policies and strategies.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EquIA) or Equality Analysis on a policy, service or function. It is intended that this is used as a working document throughout the process, with a final version including the action plan section being published on the Council's and NHS Bath and North East Somerset's websites.

This document has been created to consider the implementation of an additional charge for Euro VI HGVs (exceeding 12 tonnes) through the variation of the Bath Clean Air Zone Charging Order 2021. It will remain an evolving document to ensure that all equality issues are properly considered during the life of the Clean Air Zone scheme, including any variations to the Charging Order.

Further information on the proposals can be found at <https://beta.bathnes.gov.uk/bath-clean-air-zone>

1.	The aims of the policy or service
1.1	<p><i>Background</i></p> <p>Implementing variations to the Order is one of a package of measures set out within the Journey to Net Zero policy that could contribute to the improving local air quality and tackling congestion, whilst also preserving the World Heritage status of the city. Poor air quality is recognised as a major public health issue in Bath and North East Somerset and is identified as a corporate priority by the Council.</p>
1.2	<p><i>Briefly describe purpose of the service/policy including: how the service/policy is delivered and by whom; if responsibility for its implementation is shared with other departments or organisations and intended outcomes</i></p>
1.3	<p>The implementation of this policy must be delivered through engagement with communities and interest groups within B&NES. This will be completed by a project team within Delivery and Transformation with support from teams across the Council, and from external organisations such as neighbouring local authorities and transport operators.</p> <p>The intended outcome of this policy is aimed at contributing to the Journey to Net Zero strategy, by the Council continuing to evolve and</p>

	develop strategies for changing travel behaviours, which will build upon the success of the CAZ and ensure ongoing improvement in environmental quality and amenity once the CAZ is deemed to have achieved compliance with national targets.
1.4	<i>Provide brief details of the scope of the policy or service being reviewed, for example: is it a new service/policy or review of an existing one? Is it a national requirement? How much room for review is there?</i>
1.5	<ul style="list-style-type: none"> • If agreed by Cabinet, this is a new local policy which is distinct from the CAZ charges and outside of the CAZ National Framework. • If agreed by Cabinet, a public consultation on the introduction of the charge will take place in late 2022/early 2023 and the feedback from this consultation will be reviewed before any decision on implementation is made.
1.6	<i>Do the aims of this policy link to or conflict with any other policies of the Council?</i>
1.7	<p>This policy has links at both the sub-regional and local level:</p> <p>Sub-regional:</p> <ul style="list-style-type: none"> • The West of England LEP's Strategic Economic Plan (2015-30), which establishes the economic vision for the sub-region. • The West of England Joint Local Transport Plan 4 (2020-2036), published in March 2020 which sets out the transport priorities for the sub-region. • Partnership arrangements to identify the economic development and growth projections for the sub-region. • The City Region Sustainable Transport Settlement 2021 which provides funding to promote decarbonisation of transport, promoting a shift from cars to public transport, walking and cycling. <p>Local:</p> <ul style="list-style-type: none"> • B&NES Placemaking Plan (PMP), which aims to guide development up until 2029 and ensure that any developments within this timeframe are high quality, sustainable, well located and supported by appropriate infrastructure. • The Transport Delivery Action Plan for Bath 'Journey to Net Zero', which will identify measures in the short, medium and long term to support the Climate Emergency and achieving carbon neutrality. • The B&NES Parking Strategy, which sets out the need to reduce the intrusion of vehicles into urban centres, reflecting concerns surrounding the impact of high numbers of vehicle movements on air quality. • The Council declared a Climate Emergency in March 2019 which identifies as a priority the need for a major shift to mass transport, walking and cycling to reduce carbon emissions by 2030.

2. Consideration of available data, research and information		
Key questions		Data, research and information that you can refer to
2.1	What is the equality profile of the team delivering the service/policy?	The size of the CAZ Project Team is too small to provide any meaningful equality profile information.
2.2	What equality training have team members received?	Team members in the wider CAZ Project Team have received equalities training and are regularly updated on equalities issues.
2.3	What is the equality profile of service users?	Information about the equalities profile of people in Bath and North East Somerset can be found at http://www.bathnes.gov.uk/services/your-council-and-democracy/local-research-and-statistics/census-and-population
2.4	What other data do you have?	Data has been collected from the CAZ enforcement cameras on the volumes of N3 class vehicles entering the city and their compliance status which has informed the number of vehicles which could be impacted by the introduction of this charge.
2.5	What engagement or consultation has been undertaken?	Initial consultation has been undertaken with local haulage operators and representatives of the Road Haulage Association.
2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	<p>As part of this proposal, the Council will look to engage people who may find it difficult to take part, such as operators who do not belong to trade associations, unemployed people, those with disabilities and people for whom English is not their first language.</p> <p>All respondents will have a choice of submitting comments through a variety of means – including digital and non-digital options with support offered for both. Consultation materials will be made available in alternative formats on request.</p> <p>All communities across B&NES are welcome and encouraged to contribute to the public consultation.</p> <p>Publicity will take the form of press releases and social media posts.</p>

3. Assessment of impact: 'Equality analysis'

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:			
<ul style="list-style-type: none"> • Meets any particular needs of equalities groups or helps promote equality in some way. • Could have a negative or adverse impact for any of the equalities groups 			
		Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1	Gender – identify the impact/potential impact of the policy on women and men.	N/A	It is believed the proposal if implemented, will not have a significant impact on this protective characteristic group.
3.2	Pregnancy and maternity	The introduction of the Clean Air Zone in March 2021 has brought about reductions in nitrogen dioxide levels which are documented here: https://beta.bathnes.gov.uk/policy-and-documents-library/baths-clean-air-zone-monitoring-reports	Emerging evidence suggests that air pollution can affect the growth of the unborn baby and may be linked to premature birth (<i>Impact of London's road traffic air and noise pollution on birth weight: retrospective population-based cohort study, British Medical Journal 2017.</i>) (RCPCH and RCP Report Every Breath We Take). Therefore, any further reduction which can be achieved in nitrogen dioxide levels and other pollutants brought about by the introduction of the proposed charge, should have a positive impact on people within this protective characteristic group.
3.3	Transgender – identify the impact/potential impact of the policy on transgender people	N/A	It is believed the proposal if implemented, will not have a significant impact on this protective characteristic group.

3.4	Disability - identify the impact/potential impact of the policy on disabled people (ensure consideration both physical and mental impairments)	<p>People with health conditions or impairments may have chronic conditions which can be worsened by air pollution:</p> <table border="1" data-bbox="539 233 1615 443"> <thead> <tr> <th>Disease</th> <th>No. of people</th> <th>Proportion of B&NES population</th> </tr> </thead> <tbody> <tr> <td>Chronic heart disease</td> <td>5737</td> <td>2.8%</td> </tr> <tr> <td>Stroke/TIA*</td> <td>3656</td> <td>1.8%</td> </tr> <tr> <td>Asthma</td> <td>12912</td> <td>6.2%</td> </tr> <tr> <td>COPD**</td> <td>2939</td> <td>1.4%</td> </tr> </tbody> </table> <p>Source: QOF indicators 2017/2018 available from: https://digital.nhs.uk/data-and-information/publications/statistical/quality-and-outcomes-framework-achievement-prevalence-and-exceptions-data/2017-18 *transient ischemic attack, ** Chronic Obstructive Pulmonary Disease</p>	Disease	No. of people	Proportion of B&NES population	Chronic heart disease	5737	2.8%	Stroke/TIA*	3656	1.8%	Asthma	12912	6.2%	COPD**	2939	1.4%	Any further reduction which can be achieved in nitrogen dioxide levels and other pollutants brought about by the introduction of the proposed charge, should have a positive impact on people within this protective characteristic group.
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3.5	Age – identify the impact/potential impact of the policy on different age groups	<p>Children and young people may be more vulnerable to the health impacts of air pollution (<i>World Health Organization (2013) Review of evidence on health aspects of air pollution</i>).</p> <p>There is good evidence for the association between the development of asthma in childhood and traffic-related air pollution https://www.sciencedirect.com/science/article/pii/S0160412016307838?via%3Dihub</p> <p>Further, there is evidence to suggest that the elderly are disproportionately affected by the public health impacts of air pollution (<i>Simoni et al., Adverse effects of outdoor pollution in the elderly, Journal of Thoracic Disease, January 2015</i>).</p>	Any further reduction which can be achieved in nitrogen dioxide levels and other pollutants brought about by the introduction of the proposed charge, should have a positive impact on people within this protective characteristic group.															
3.6	Race – identify the impact/potential impact on different black and minority ethnic groups	N/A	It is believed the proposal if implemented, will not have a significant impact on this protective characteristic group.															
3.7	Sexual orientation - identify the impact/potential impact of the policy on lesbians, gay, bisexual &	N/A	It is believed the proposal if implemented, will not have a significant impact on this protective characteristic group.															

	heterosexual people		
3.8	Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?	N/A	It is believed the proposal if implemented, will not have a significant impact on this protective characteristic group.
3.9	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	N/A	It is believed the proposal if implemented, will not have a significant impact on this protective characteristic group.
<i>Whilst not protected characteristics, the Council has chosen to include the following issues because of the distinctive context of B&NES.</i>			
3.9	Socio-economically disadvantaged – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances	The Council has invested in expanding both air quality and traffic flow monitoring within the charging scheme area and on other major traffic routes within B&NES, so that any impacts can be identified, and mitigations considered.	Data on any impacts of the proposed charge (both positive and negative) on traffic flows, fleet compliance and air quality across the wider B&NES area will be monitored and the outcomes of this monitoring will be published. Any impacts will be mitigated by the introduction of time-limited exemptions for those vehicles and businesses which could be affected by the charge.
3.10	Rural communities and those living outside of the charging scheme area – identify the impact / potential impact on people living in rural communities	The Council has invested in expanding both air quality and traffic flow monitoring within the charging scheme area and on other major traffic routes within B&NES, so that any impacts can be identified, and mitigations considered.	Data on any impacts of the proposed charge (both positive and negative) on traffic flows, fleet compliance and air quality will be collected, and the outcomes of this monitoring will be published. Any impacts will be mitigated by the introduction of time-limited exemptions

			for those vehicles and businesses which could be affected by the charge.
3.12	Residents living in Bath	The Council has invested in expanding both air quality and traffic flow monitoring within the charging scheme area and on other major traffic routes within B&NES, so that any impacts can be identified, and mitigations considered.	<p>Data on any impacts of the proposed charge (both positive and negative) on traffic flows, fleet compliance and air quality will be collected, and the outcomes of this monitoring will be published.</p> <p>Any impacts will be mitigated by the introduction of time-limited exemptions for those vehicles and businesses which could be affected by the charge.</p>
3.11	Businesses		<p>Haulage operators located in the proposed exemption area will benefit from a time-limited exemption to provide more time to upgrade their vehicles.</p> <p>This will also assist any businesses within the city who receive deliveries from HGV N3 vehicles.</p>

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when	Completion Date
Need to review after public consultation when more feedback is available about proposal.	Review EQuIA following public consultation	Revised EQuIA will be published	Cathryn Brown	March 2023	

5.

Signed off by: Chris Major (Senior Responsible Project Officer)

Date: November 2022