

Equality Impact Assessment / Equality Analysis

Title of service or policy	Introduction of a Clean Air Zone in Bath and North East Somerset
Team	Development and Public Protection
Officer leading the completion of the EqlA	Cathryn Brown, Team Manager
Date of assessment	March 2019

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 (EqIAs) 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 (EqIA) 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 updated following the public consultation on proposals for a Clean Air Zone in Bath in October and November 2018, and will remain an evolving document to ensure that all equality issues are properly considered.

Further information on the proposals can be found at <http://www.bathnes.gov.uk/bath-breathes-2021> .

1.	The aims of the policy or service
1.1	<p>Background</p> <ul style="list-style-type: none"> • 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. • In the report 'Every breath we take' published by the Royal College of Physicians and the Royal College of Paediatrics and Child Health in 2016, it states that some people will suffer more from air pollution because they live in deprived areas which often have higher levels of air pollution, they live, learn or work near busy roads or they may be more vulnerable because of pre-existing medical conditions. • Nitrogen dioxide and particulate matter are the pollutants which are identified as presenting the highest risk and these are monitored throughout the authority. Exposure to high levels of NO₂ can make existing heart and lung conditions such as asthma worse; particulates are now known to contribute to heart disease and lung cancer (Air Quality - a briefing for Directors of Public Health, DEFRA, 2017) • As a pollutant, nitrogen dioxide has been assigned a national air quality objective, requiring compliance by the Council to reduce levels below the objective limit. The main source of nitrogen dioxide is from vehicle emissions, with diesel vehicles being the major contributing source of pollution.

	<ul style="list-style-type: none"> The Council is responsible for monitoring and achieving compliance under Part IV of the Environment Act 1995. In 2002 Bath city centre and the main roads leading into it, was declared as an Air Quality Management Area. An Air Quality Action Plan was developed and has been reviewed several times, the latest being in 2017. The opportunity was taken to feed comments from this review into the consultation and engagement for the National Air Quality Plan. The updated Action Plan will be published following the completion of the project to achieve compliance with the National Air Quality Plan.
1.2	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
1.3	<ul style="list-style-type: none"> The implementation of this policy must be delivered through engagement with communities within B&NES. This will be completed by teams across the Council, with support from external organisations such as the Joint Air Quality Unit, Highways England and transport operators. The intended outcome of this policy is to achieve compliance with the Ministerial Direction served on the Council by DEFRA and DfT (known as the Joint Air Quality Unit). This Direction is served under the Environment Act 1995 (Feasibility for Nitrogen Dioxide Compliance) Air Quality Direction 2017.
1.4	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?
1.5	<ul style="list-style-type: none"> This is the introduction of a new policy which is required following the service of a Ministerial Direction referred to in 1.2 above. The Council is one of a number of local authorities served with such a Direction, as part of the National Air Quality Plan, to deliver compliance with the national air quality objective for nitrogen dioxide in the shortest time possible and by 2021 at the latest. Technical assessment and modelling carried out to date, confirms that in order to achieve the required reduction in concentrations, a Clean Air Zone (CAZ) is required where drivers of certain higher emission vehicles will be charged for entering a defined geographical zone in the city. In addition to this charging measure, a suite of non-charging measures are being proposed to support the necessary behaviour change from the public and businesses. The Council is also considering possible exemptions and concessions to mitigate any negative impacts for particular groups which maybe created by the introduction of a CAZ. The Strategic Outline Business Case (SOBC) established that, only a charging Class D CAZ would achieve compliance by 2021. This was subject to public consultation in 2018. Following further review, assessment showed that a charging Class

	<p>C resulted in a single exceedance at Gay St caused by localised traffic issues. As such, traffic management measures at this location were investigated and a feasible scheme developed. When assessed, a second option comprising a charging Class C CAZ with a traffic management scheme in place at Queen Square, was found to achieve the required compliance by 2021.</p> <ul style="list-style-type: none"> The Ministerial Direction requires the Council to identify a preferred option that will deliver the necessary compliance in the shortest time possible. The Council's Cabinet will decide the preferred option in March 2019 and assuming one of the above options is chosen, a charging CAZ will be formally introduced by a Charging Order later in 2019.
1.6	<p><i>Do the aims of this policy link to or conflict with any other policies of the Council?</i></p>
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 (2011-26), which sets out the transport priorities for the sub-region. The West of England Joint Spatial Plan (JSP), which identifies the economic development and growth projections for the sub-region. The West of England Joint Transport Strategy (JTS), which provides a clear direction for the long-term development of the transport system in the West of England to 2036 and beyond. <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. B&NES Getting Around Bath (GAB) Transport Strategy, which aims to 'enhance Bath's unique status by adopting measures that promote sustainable transport and reduce the intrusion of vehicles, particularly in the historic core. This will enable more economic activity and growth, while enhancing its special character and environment and improving the quality of life for local people'. 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 B&NES Public Realm and Movement Strategy for Bath City Centre 'is designed to give pedestrians, cyclists and public transport vehicles priority over cars, and deliver a network of beautiful, refashioned streets and public spaces'.

- Our Customer Services Transformation programme could result in less face to face interaction with customers at our One Stop Shops as we encourage those who are able to access information and services online.

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 Environmental Monitoring Team is too small to provide any meaningful equality profile information.
2.2	What equality training have team members received?	Team members in Environmental Monitoring 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?	As part of the Outline Business Case (OBC) for the CAZ, a Distribution and Equality Impact Analysis has been carried out. This provides more detailed information on the groups which could be impacted by the introduction of a charging CAZ and is appended to the OBC. This has been updated to reflect the option of a charging Class C CAZ.
2.5	What engagement or consultation has been undertaken?	The Council has been engaging with the public since April 2018 on the introduction of a CAZ in Bath and a summary of the outcomes of this work can be found in the Engagement and Consultation reports which are appended to the draft Outline Business Case. This has been updated to reflect the option of a charging Class C CAZ.
2.6	If you are planning to undertake any consultation in the future regarding	<ul style="list-style-type: none"> • A formal period of public consultation took place in October/November 2018. Following the initial equalities screening, contacts have been made with specific organisations to better understand both the positive and negative impacts of introducing a charging CAZ and these were explored further during the consultation period.

	<p>this service or policy, how will you include equalities considerations within this?</p>	<ul style="list-style-type: none"> • Such organisations include Age UK, BEMSCA (Bath Ethnic Minority Senior Citizen Association), 3SG (a membership network for third sector organisations in B&NES), head teacher forums and religious groups (this is not intended to be an exhaustive list). • Consultation documents were accessible via the Council’s website, One Stop Shops and libraries. During the consultation 300 paper surveys were completed and over 8000 surveys were completed on line. The survey developed for the public consultation contained a specific question, designed to capture concerns and comments from everyone by having an open text box/available space for comments. The formal report on the public consultation is appended to the OBC. • Communication regarding any decision and implementation process relating to the charging CAZ, will be designed to meet the communication needs of our diverse community (i.e. we will use a variety of methods to make sure that everyone is kept informed and make information available in different formats).
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3	<p>Assessment of impact:</p> <p><i>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 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</i></p>
3.1	<p>An initial screening process for each of the protected characteristics was carried out and has been updated following the public consultation in 2018. A separate equality impact assessment will be developed for the proposed traffic management measures in Queen Square if a charging Class C CAZ scheme is chosen.</p>
3.2	<p>Potential positive impacts:</p>
3.3	<p>Although air pollution can be harmful to everyone, some people are more affected than others because they are exposed to higher levels of air pollution in their day to day lives, live in a polluted area, or are more susceptible to health problems caused by air pollution. The most vulnerable people face all of these disadvantages. Overall, the introduction of a charging Class D CAZ, which brings about compliance with legal levels for nitrogen dioxide, will have positive health benefits for all and in particular for those people in the following protected characteristic groups:</p> <ul style="list-style-type: none"> • Age • Disability • Pregnancy and Maternity <p>The introduction of a charging Class C CAZ will also bring similar benefits. There is a location in Whiteway, Bath where small increases in traffic flow, due to the additional traffic management measures in Queen Square, will result in a small net decrease in air quality for this area, where there is a higher concentration of children. However, irrespective of this, it is not anticipated that the national objective for nitrogen dioxide will be exceeded in this location.</p> <p>Other positive impacts are likely to include small scale public transport accessibility benefits due to a reduction in traffic volumes within the CAZ area and impacts of the supporting abatement measures, particularly for the charging CAZ C option. These benefits are likely to be concentrated on existing bus users who are typically more likely to be from lower income groups, older people, and households without a car than the background population. Park & Ride measures are likely to benefit existing park & ride users, and may also attract new users. Existing park & ride users are more likely to be women, aged over 60, and from middle income groups.</p>

3.4	Potential negative impacts:
3.5	<p>The analysis demonstrates that some groups of people could be adversely affected by the Council’s proposal to implement a charging Class D CAZ.</p> <p>In particular, there could be negative impacts relating to accessibility and affordability for the following protected characteristic groups and specific groups identified with the context of B&NES:</p> <ul style="list-style-type: none"> • Gender • Pregnancy and maternity • Age • Disability • Race • Religion • Rural communities • Socio-economically disadvantaged • Residents living both inside and outside of the proposed CAZ • Businesses <p>For a charging Class C CAZ, the following groups could be negatively impacted for reasons of accessibility and affordability:</p> <ul style="list-style-type: none"> • Age • Disability • Race • Residents living outside of the proposed CAZ • Businesses

4	<i>Gender – identify the impact/potential impact of the policy on women and men.</i>
4.1	<i>Details of the impact</i>
4.2	<ul style="list-style-type: none"> • Data from the 2011 Census suggests that 57% of people residing in households without access to a car in B&NES are female and females form 51% of the B&NES population. The Distribution and Equality Impact Analysis demonstrates that women are disproportionately located on the periphery of the CAZ area. • Therefore, it is possible that women are more likely to lack access to a car relative to their male counterparts and maybe more reliant on public transport to access locations within the CAZ. • Any change in accessibility associated with the introduction of a charging Class D CAZ could impact on connectivity for women. • There is no evidence to show that there would be a negative impact on gender for the introduction of a charging Class C CAZ.
4.3	<i>What steps have been or could be taken to address the impacts?</i>
4.4	<p>Ongoing consultation with the Council’s Independent Equality Advisory Group (this is the Council’s forum for equality issues).</p> <p>Relevant mitigation measures funded from the Clean Air Fund which would be eligible under a charging Class D CAZ:</p> <ul style="list-style-type: none"> • Provision of additional cycle parking across the city centre in visible locations and pilot a management scheme to improve proper usage of cycle parking • Provision of 24hr secure parking (including CCTV) at all three P&R sites to encourage overnight use and facilitate extended operating hours • Provision of a free park and ride concession which will benefit existing users as well as attracting new users. Existing park & ride users are more likely to be women, aged over 60, and from middle income groups. • Financial support for replacing uncompliant vehicles with compliant ones and electric charging points on private land <p>Relevant local exemptions:</p> <p>In addition to national exemptions, the following vehicles will be granted a local exemption providing they are registered under the relevant tax class on the day they enter the CAZ:</p> <ul style="list-style-type: none"> • Gas (LPG/CNG) or hybrid electric vehicles in the Alternative Fuel Car Vehicle tax class

- Vehicle in the Motorcycle tax class not already exempt under the CAZ Framework.

Relevant local concessions:

Concessions are under consideration for the following vehicle types until 01/01/2023:

CAZ C and D:

Euro 4/5 diesel registered community transport providers - to maintain access for communities to schools, medical and community centres and religious establishments.

5	<i>Pregnancy and maternity</i>
5.1	<i>Details of the impact</i>
5.2	<ul style="list-style-type: none"> 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 the reduction in nitrogen dioxide levels brought about by compliance with the Ministerial Direction should have a positive impact on people within this protective characteristic group. Under a charging Class D CAZ, it is possible that some people may experience problems in accessing medical appointments, toddler groups or other support networks for parents, particularly if they travel by car. These impacts could also be experienced under a charging Class C CAZ because of impacts on community transport providers.
5.3	<i>What steps have been or could be taken to address the impacts?</i>
5.4	<p>Ongoing consultation with the Council's Independent Equality Advisory Group (this is the Council's forum for equality issues).</p> <p>Relevant mitigation measures funded from the Clean Air Fund which would be eligible under a charging Class D scheme :</p> <ul style="list-style-type: none"> Provision of 24hr secure parking (including CCTV) at all three P&R sites to encourage overnight use and facilitate extended operating hours Provision of a free park and ride concession which will benefit existing users as well as attracting new users. Existing park & ride users are more likely to be women, aged over 60, and from middle income groups. Financial support for replacing uncompliant vehicles with compliant ones and electric charging points on private land <p>Relevant local exemptions:</p> <p>In addition to national exemptions, the following vehicles will be granted a local exemption providing they are registered under the relevant tax class on the day they enter the CAZ:</p> <ul style="list-style-type: none"> Gas (LPG/CNG) or hybrid electric vehicles in the Alternative Fuel Car Vehicle tax class

Relevant local concessions:

Concessions are under consideration for the following vehicle types until 01/01/2023:

CAZ C and D:

- Euro 4/5 diesel registered community transport providers - to maintain access for communities to schools, medical and community centres and religious establishments.

CAZ D Only:

- Euro 4/5 vehicles registered to healthcare providers - would provide benefits particularly to those who are pregnant, ill and/or disabled, who will have continued access to their healthcare providers.

6	Disability															
6.1	<i>Details of the impact</i>															
6.2	<p>Some disabled people have chronic conditions which can be made worse by air pollution:</p> <table border="1"> <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> <p>Therefore, improvements in air quality will benefit this group.</p> <ul style="list-style-type: none"> • Disabled people are likely to have concerns over access to a range of key amenities (e.g. health facilities), so any change in accessibility could hinder their ability to reach such facilities. • The Distribution and Equality Impact Analysis indicates that areas with higher proportions of disabled people will benefit from decreased motor traffic flows under a charging Class D CAZ. • The Distribution and Equality Impact Analysis also indicates that communities with a high disability ratio are located throughout the CAZ area and are particularly concentrated in central Bath and on the western periphery. Therefore, the disabled population in central Bath may suffer from reduced accessibility with the implementation of either of the proposed CAZ schemes, due to more limited choices on modes of compliant transport. • In the charging Class C CAZ, larger increases in motor traffic flows will occur in areas with higher than average concentrations of disabled people, and the larger decreases in motor traffic will occur in areas with the highest average concentrations of disabled people. As such, disabled people will see the greatest share of both the benefits and disbenefits in terms of severance. 	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%
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6.3	<i>What steps have been or could be taken to address the impacts?</i>															
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Relevant mitigation measures funded from the Clean Air Fund which would be eligible under a charging Class D scheme:

- Provision of 24hr secure parking (including CCTV) at all three P&R sites to encourage overnight use and facilitate extended operating hours
- Provision of a free park and ride concession
- Financial support for replacing uncompliant vehicles with compliant ones and electric charging points on private land

Relevant local exemptions:

In addition to national exemptions, the following vehicles will be granted a local exemption providing they are registered under the relevant tax class on the day they enter the CAZ:

- Gas (LPG/CNG) or hybrid electric vehicles in the Alternative Fuel Car Vehicle tax class
- Other vehicles in the Exempt Vehicles tax class not already exempt under the CAZ Framework including:
 - vehicles used by a disabled person (disabled tax class);
 - National Health Service vehicles;

Relevant local concessions:

Concessions are under consideration for the following vehicle types until 01/01/2023:

CAZ C and D:

- Euro 4/5 wheelchair accessible vehicles used as taxis - to maintain access opportunities for disabled persons.
- Euro 4/5 diesel registered community transport providers - to maintain access for communities to schools, medical and community centres and religious establishments.

CAZ D Only:

- Euro 4/5 diesel (vans & cars) registered blue badge holders - due to the difficulty in switching to an alternative transport modes and their possible lower socio-economic group, leading to difficulty in upgrading vehicles.
- Euro 4/5 vehicles registered to healthcare providers - would provide benefits to all key local groups, but particularly those who are pregnant, ill and/or disabled, who will have continued access to their healthcare providers.

7	Age																								
7.1	Details of the impact																								
7.2	<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> <p>The number and proportion of older people in B&NES is projected to increase over the coming years. Between 2016 and 2029 the number of over 75's in the population is projected to increase by 36% (approximately 6,000 people). Over the same time period the numbers of people over 90 are projected to increase by 25%. (<i>Source: B&NES JSNA</i>)</p> <table border="1"> <thead> <tr> <th></th> <th>2016</th> <th>2022</th> <th>2029</th> <th>2016-2029</th> <th>Change 2016-2029</th> </tr> </thead> <tbody> <tr> <td>75+</td> <td>16,600</td> <td>19,300</td> <td>22,600</td> <td>6,000</td> <td>36%</td> </tr> <tr> <td>85+</td> <td>5,300</td> <td>5,500</td> <td>6,700</td> <td>1,400</td> <td>26%</td> </tr> <tr> <td>90+</td> <td>2,000</td> <td>2,100</td> <td>2,500</td> <td>500</td> <td>25%</td> </tr> </tbody> </table> <p>Therefore the reduction in nitrogen dioxide levels brought about by compliance with the Ministerial Direction should have an overall positive impact on people within this protective characteristic group.</p> <ul style="list-style-type: none"> • There are likely to be small scale public transport accessibility benefits due to a reduction in traffic volumes within the CAZ area and impacts of the supporting abatement measures, particularly for the charging CAZ C option. These benefits are likely to be concentrated on existing bus users who are typically likely to include older people. • Children and elderly people require access to a range of key amenities (e.g. schools and health facilities), so any change in accessibility could hinder their ability to reach such facilities. This is likely to be a significant impact under a charging Class D CAZ and also under a charging Class C CAZ because of impacts on community transport providers. 		2016	2022	2029	2016-2029	Change 2016-2029	75+	16,600	19,300	22,600	6,000	36%	85+	5,300	5,500	6,700	1,400	26%	90+	2,000	2,100	2,500	500	25%
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	<ul style="list-style-type: none"> • The charging Class D CAZ results in motor traffic flow decreases, predominately across the charging CAZ area, but also along key radial routes in to Bath. As there are areas with fewer children within the charging area, this is a group likely to benefit the most from noise, accident, and severance impacts as a result of the charging Class D CAZ. • The charging Class C CAZ results in both motor traffic flow increases and decreases in central Bath due to the CAZ charge and traffic management scheme on Queen Square. As there are areas with fewer children within the charging area, this is a group likely to experience the most benefits and disbenefits from noise, accident, and severance impacts as a result of the charging Class C CAZ. • The charging Class C Clean Air Zone small increases in traffic flow due to the additional traffic management measures in Queen Square, will result in a small net decrease in air quality for the area of Whiteway Road/Rush Hill where there is a high concentration of children. However, irrespective of this, it is not anticipated that the national objective for nitrogen dioxide will be exceeded in this location.
7.2	<i>What steps have been or could be taken to address the impacts?</i>
7.3	<p>Ongoing consultation with the Council's Independent Equality Advisory Group (this is the Council's forum for equality issues).</p> <p>Relevant mitigation measures funded from the Clean Air Fund which would be eligible under a charging Class D scheme:</p> <ul style="list-style-type: none"> • Provision of additional cycle parking across the city centre in visible locations and pilot a management scheme to improve proper usage of cycle parking, together with the development of cycle priority schemes. • Scoot/Cycle to School Initiative • Provision of 24hr secure parking (including CCTV) at all three P&R sites to encourage overnight use and facilitate extended operating hours • Provision of a free park and ride concession Park & Ride measures are likely to benefit existing park & ride users, and may also attract new users. Existing park & ride users are more likely to include people aged over 60. • Financial support for replacing uncompliant vehicles with compliant ones and electric charging points on private land

Relevant local exemptions:

In addition to national exemptions, the following vehicles will be granted a local exemption providing they are registered under the relevant tax class on the day they enter the CAZ:

- Gas (LPG/CNG) or hybrid electric vehicles in the Alternative Fuel Car Vehicle tax class
- Vehicle in the Motorcycle tax class not already exempt under the CAZ Framework.

Relevant local concessions:

Concessions are under consideration for the following vehicle types until 01/01/2023:

CAZ C and D:

Euro 4/5 diesel registered community transport providers - to maintain access for communities to schools, medical and community centres and religious establishments.

CAZ D Only:

- Euro 4/5 diesel registered blue badge holders - due to the difficulty in switching to an alternative transport modes and their possible lower socio-economic group, leading to difficulty in upgrading vehicles.
- Euro 4/5 vehicles registered to healthcare providers - would provide benefits to all key local groups, but particularly those who are pregnant, the ill and/or disabled, who will have continued access to their healthcare providers.

Additional measures:

- Ongoing monitoring of air quality levels across the authority, including Whiteway, to monitor any increases in nitrogen dioxide levels under the scheme, so that corrective action can be taken.
- Ongoing monitoring of traffic flows and road traffic accident data across the authority to assess any unforeseen changes so that corrective action can be taken.

8	Race
8.1	<i>Details of the impact</i>
8.2	<p>The B&NES population contains fewer than the national average of black and minority ethnic people (5.4% as opposed to 14.03% nationally).</p> <p>The Joint Strategic Needs Assessment identifies that in the Bath area only Bathwick (14.70%) had a higher proportion of black and minority ethnic people in 2011 than the England & Wales average (14.03%). However, only two of the wards, Lyncombe (4.21%) and Lambridge (5.32%) had a lower proportion of black and minority ethnic people than the B&NES average (5.42%).</p> <p>It is possible that this group of people may be affected by any changes in accessibility in reaching facilities such as community and medical centres under both schemes.</p> <p>We are currently assessing what proportion of our licenced taxi drivers are from BME groups.</p>
8.3	<i>What steps have been or could be taken to address the impacts?</i>
8.4	<p>Ongoing consultation with the Council's Independent Equality Advisory Group (this is the Council's forum for equality issues).</p> <p>Relevant mitigation measures funded from the Clean Air Fund which would be eligible under a charging Class D scheme:</p> <ul style="list-style-type: none"> • Provision of additional cycle parking across the city centre in visible locations and pilot a management scheme to improve proper usage of cycle parking • Provision of 24hr secure parking (including CCTV) at all three P&R sites to encourage overnight use and facilitate extended operating hours • Provision of a free park and ride concession • Financial support for replacing uncompliant vehicles with compliant ones and electric charging points on private land <p>Relevant local exemptions:</p> <p>In addition to national exemptions, the following vehicles will be granted a local exemption providing they are registered under the relevant tax class on the day they enter the CAZ:</p> <ul style="list-style-type: none"> • Gas (LPG/CNG) or hybrid electric vehicles in the Alternative Fuel Car Vehicle tax class

- Vehicle in the Motorcycle tax class not already exempt under the CAZ Framework.
- Other vehicles in the Exempt Vehicles tax class not already exempt under the CAZ Framework including:
 - vehicles used by a disabled person (disabled tax class);
 - National Health Service vehicles;

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- Euro 4/5 vehicles registered to healthcare providers - would provide benefits to all key local groups, but particularly the ill and/or disabled, who will have continued access to their healthcare providers.

9	<i>Religion/belief</i>
9.1	<i>Details of the impact</i>
9.2	<p>A number of faith based venues are located within the proposed boundary of the CAZ, e.g. Bath City Church, Elim Church and Bath Islamic Centre. Attendees to these venues maybe disadvantaged if they do not have alternative, compliant methods of transport.</p> <p>This is likely to be a significant impact under a charging Class D CAZ and to a lesser extent under a charging Class C CAZ if community transport providers are impacted.</p>
9.3	<i>What steps have been or could be taken to address the impacts?</i>
9.4	<p>Ongoing consultation with the Council's Independent Equality Advisory Group (this is the Council's forum for equality issues).</p> <p>Relevant mitigation measures funded from the Clean Air Fund which would be eligible under a charging Class D scheme:</p> <ul style="list-style-type: none"> • Provision of additional cycle parking across the city centre in visible locations and pilot a management scheme to improve proper usage of cycle parking, together with the development of cycle priority schemes. • Provision of 24hr secure parking (including CCTV) at all three P&R sites to encourage overnight use and facilitate extended operating hours • Provision of a free park and ride concession • Financial support for replacing uncompliant vehicles with compliant ones and electric charging points on private land <p>Relevant local exemptions:</p> <p>In addition to national exemptions, the following vehicles will be granted a local exemption providing they are registered under the relevant tax class on the day they enter the CAZ:</p> <ul style="list-style-type: none"> • Gas (LPG/CNG) or hybrid electric vehicles in the Alternative Fuel Car Vehicle tax class • Vehicle in the Motorcycle tax class not already exempt under the CAZ Framework. • Other vehicles in the Exempt Vehicles tax class not already exempt under the CAZ Framework including: <ul style="list-style-type: none"> ○ vehicles used by a disabled person (disabled tax class); ○ National Health Service vehicles;

	<p>Relevant local concessions: Concessions are under consideration for the following vehicle types until 01/01/2023:</p> <p>CAZ C and D:</p> <ul style="list-style-type: none"> • Euro 4/5 diesel registered community transport providers - to maintain access for communities to schools, medical and community centres and religious establishments. <p>CAZ D Only:</p> <ul style="list-style-type: none"> • Euro 4/5 diesel registered blue badge holders - due to the difficulty in switching to an alternative transport modes and their possible lower socio-economic group, leading to difficulty in upgrading vehicles.
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10	<i>Sexual orientation; marriage and civil partnership and transgender people</i>
10.1	<i>Details of the impact</i>
10.2	No impact identified under either a charging Class C or a charging Class D CAZ

11	<i>Whilst not protected characteristics, the Council has chosen to include the following issues because of the distinctive context of B&NES.</i>
11.1	<i>Socio-economically disadvantaged</i> –factors like family background, educational attainment, neighbourhood, employment status can influence life chances
11.2	<i>Details of the impact</i>
11.3	<ul style="list-style-type: none"> • The Distribution and Equality Impact Analysis indicates that the most acute concentrations of low income households are located in and around Twerton on the western outskirts of Bath. Under a charging Class D CAZ these communities should experience a decline in nitrogen dioxide concentrations of between 0 and 5 micrograms. • Under a charging Class C CAZ, small increases in traffic flow on Whiteway Road, due to the additional traffic management measures in Queen Square, result in a small net increase in nitrogen dioxide concentrations in this location; all other locations will benefit from a decline in nitrogen dioxide concentrations. • There are also areas of income deprivation in central Bath too (albeit less severe than on the western periphery). Under both schemes it is anticipated that there will be a more significant reduction in nitrogen dioxide concentrations in these communities, contributing to a notable beneficial air quality impact. • There are likely to be small scale public transport accessibility benefits due to a reduction in traffic volumes within the CAZ area and impacts of the supporting abatement measures, particularly for the charging CAZ C option. These benefits are likely to be concentrated on existing bus users who are typically more likely to include lower income groups. • It is possible that people within this group may find it difficult to access and afford alternative, compliant methods of transport, particularly if they are low paid and work antisocial or flexible shifts. This is likely to be a significant impact under a charging Class D CAZ. • In addition, sole traders who own non-compliant LGV's will experience affordability impacts under both CAZ schemes.
11.4	<i>What steps have been or could be taken to address the impacts?</i>
11.5	Ongoing consultation with the Council's Independent Equality Advisory Group (this is the Council's forum for equality issues).

Relevant mitigation measures funded from the Clean Air Fund which would be eligible under a charging Class D scheme:

- Provision of additional cycle parking across the city centre in visible locations and pilot a management scheme to improve proper usage of cycle parking
- Provision of 24hr secure parking at all three P&R sites to encourage overnight use and facilitate extended operating hours
- Provision of a free park and ride concession
- Financial support for replacing uncompliant vehicles with compliant ones and electric charging points on private land

Relevant local exemptions:

In addition to national exemptions, the following vehicles will be granted a local exemption providing they are registered under the relevant tax class on the day they enter the CAZ:

- Gas (LPG/CNG) or hybrid electric vehicles in the Alternative Fuel Car Vehicle tax class
- Vehicle in the Motorcycle tax class not already exempt under the CAZ Framework.

Relevant local concessions:

Concessions are under consideration for the following vehicle types until 01/01/2023:

CAZ C and D:

- Euro 4/5 diesel registered community transport providers - to maintain access for communities to schools, medical and community centres and religious establishments.
- Euro 4/5 diesel commercial vehicles subject to a failed loan application.

CAZ D Only:

- Euro 4/5 diesel registered blue badge holders - due to the difficulty in switching to an alternative transport modes and their possible lower socio-economic group, leading to difficulty in upgrading vehicles.
- Euro 4/5 vehicles registered to healthcare providers - would provide benefits to all key local groups, but particularly the ill and/or disabled, who will have continued access to their healthcare providers.

Additional measures:

- Ongoing monitoring of air quality levels across the authority, including Whiteway, to monitor any increases in nitrogen dioxide levels under the scheme, so that corrective action can be taken.
- Ongoing monitoring of traffic flows and road traffic accident data across the authority to assess any unforeseen changes so that corrective action can be taken.

12	<i>Rural communities – identify the impact/ potential impact on people living in rural communities</i>
12.1	<i>Details of the impact</i>
12.2	<p>Those people living in rural communities may have less access to public transport options to get to their place of work or for accessing leisure and social activities.</p> <p>This is likely to be a significant impact under a charging Class D CAZ and also under a charging Class C CAZ if community transport and taxis are impacted.</p>
12.3	<i>What steps have been or could be taken to address the impacts?</i>
12.4	<p>Ongoing dialogue with the relevant Area Forums.</p> <p>Relevant mitigation measures funded from the Clean Air Fund which would be eligible under a charging Class D scheme:</p> <ul style="list-style-type: none"> • Provision of 24hr secure parking (including CCTV) at all three P&R sites to encourage overnight use and facilitate extended operating hours • Provision of a free park and ride concession • Financial support for replacing uncompliant vehicles with compliant ones and electric charging points on private land <p>Relevant local exemptions:</p> <p>In addition to national exemptions, the following vehicles will be granted a local exemption providing they are registered under the relevant tax class on the day they enter the CAZ:</p> <ul style="list-style-type: none"> • Gas (LPG/CNG) or hybrid electric vehicles in the Alternative Fuel Car Vehicle tax class • Vehicle in the Motorcycle tax class not already exempt under the CAZ Framework. <p>Relevant local concessions:</p> <p>Concessions are under consideration for the following vehicle types until 01/01/2023:</p> <p>CAZ C and D:</p> <ul style="list-style-type: none"> • Euro 4/5 diesel registered community transport providers - to maintain access for communities to schools, medical and community centres and religious establishments. • Euro 4/5 diesel commercial vehicles subject to a failed loan application.

CAZ D Only:

- Euro 4/5 diesel registered blue badge holders - due to the difficulty in switching to an alternative transport modes and their possible lower socio-economic group, leading to difficulty in upgrading vehicles.
- Euro 4/5 vehicles registered to healthcare providers - would provide benefits to all key local groups, but particularly the ill and/or disabled, who will have continued access to their healthcare providers.

13	Residents living in Bath
13.1	<i>Details of the impact</i>
13.2	<p>This group of people benefit from improvements to air quality from reductions in circulating traffic through modal shift and avoidance.</p> <p>Under both a charging Class D and a charging Class C CAZ there could be:</p> <ul style="list-style-type: none"> • Increased availability of on street parking spaces for permit holders from greater car park and park and ride usage. • Reduction in circulating traffic looking for a free space and decreased congestion from greater car park and park and ride usage. • Increased costs for entering the CAZ if either residents or contractors do not own a compliant vehicle. Contractors could pass these costs onto customers.
13.3	<p>Ongoing consultation with the Council's Independent Equality Advisory Group (this is the Council's forum for equality issues) and Residents Associations within the city.</p> <p>Relevant mitigation measures funded from the Clean Air Fund which would be eligible under a charging Class D scheme:</p> <ul style="list-style-type: none"> • Provision of additional cycle parking across the city centre in visible locations and pilot a management scheme to improve proper usage of cycle parking together with the development of cycle priority schemes • Provision of 24hr secure parking at all three P&R sites to encourage overnight use and facilitate extended operating hours • Provision of a free park and ride concession • Financial support for replacing uncompliant vehicles with compliant ones and electric charging points on private land <p>Relevant local exemptions:</p> <p>In addition to national exemptions, the following vehicles will be granted a local exemption providing they are registered under the relevant tax class on the day they enter the CAZ:</p> <ul style="list-style-type: none"> • Gas (LPG/CNG) or hybrid electric vehicles in the Alternative Fuel Car Vehicle tax class • Vehicle in the Motorcycle tax class not already exempt under the CAZ Framework. • Other vehicles in the Exempt Vehicles tax class not already exempt under the CAZ Framework including:

- vehicles used by a disabled person (disabled tax class);
- National Health Service vehicles;

Relevant local concessions:

Concessions are under consideration for the following vehicle types until 01/01/2023:

CAZ C and D:

- Euro 4/5 diesel registered community transport providers - to maintain access for communities to schools, medical and community centres and religious establishments.
- Euro 4/5 diesel commercial vehicles subject to a failed loan application.

CAZ D Only:

- Euro 4/5 diesel registered blue badge holders - due to the difficulty in switching to an alternative transport modes and their possible lower socio-economic group, leading to difficulty in upgrading vehicles.
- Euro 4/5 vehicles registered to healthcare providers - would provide benefits to all key local groups, but particularly the ill and/or disabled, who will have continued access to their healthcare providers.

14	Residents living outside of the proposed zone
14.1	<i>Details of the impact</i>
14.2	Increased potential for non-compliant vehicles to enter residential areas, looking for a diversion route or parking outside of the CAZ.
14.3	<i>What steps have been or could be taken to address the impacts?</i>
14.4	<p>Attendance at Residents Association and Area Forum meetings to explain the purpose of the Clean Air Zone and encourage feedback.</p> <p>Possible mitigations:</p> <ul style="list-style-type: none"> • Proposed amendment of the CAZ boundary to inclusion of the Pulteney Estates Area, Bathwick and Oldfield Park areas. • Review and extension of Resident's Parking Zones.

15	Businesses
15.1	<i>Details of the impact</i>
15.2	<p>The introduction of a CAZ could bring positive impacts:</p> <ul style="list-style-type: none"> • Increased availability of on street parking spaces for customers with compliant vehicles looking for short term 'pop and shop' parking. • Reduction in circulating traffic looking for a free space and decreased congestion • Improvements to air quality from reduction in circulating traffic resulting in longer dwell times. <p>There could also be negative impacts including:</p> <ul style="list-style-type: none"> • The perception that the CAZ could deter footfall in central Bath as consumers and tourists opt to visit alternative locations. This is more significant under a charging Class D CAZ. • Increased charges for deliveries to/from businesses located in the central area, providing additional costs that would either need to be absorbed by the business (affecting profitability) or passed on to consumers (increasing prices and potentially deterring custom). This is relevant under both CAZ schemes. • Impacts on a range of businesses located outside the CAZ that require routing of LGVs/HGVs through the CAZ as part of their day-to-day activities (e.g. for trades people or for suppliers/deliveries). Although these businesses are not directly affected by the CAZ based on their geographical location within the CAZ, their business practices may mean regular entry to the CAZ, potentially resulting in charges being imposed. This is relevant under both CAZ schemes. • Impacts on businesses which rely on employment sourced from a wide geographic labour market; imposing a charge on non-compliant vehicles could cause a contraction of this market as labour located in the wider geographic area choose to work in other locations that are unaffected by a CAZ. This is more significant under a charging Class D CAZ.
15.3	<i>What steps have been or could be taken to address the impacts?</i>
15.4	<p>Engagement with:</p> <ul style="list-style-type: none"> • Various Council departments including the Heritage Services and Economic Regeneration teams, • Bath Business Improvement District, • Bus, coach and taxi operators • Major employers e.g. Royal Mail

Relevant mitigation measures funded from the Clean Air Fund which would be eligible under a charging Class D scheme:

- Provision of additional cycle parking across the city centre in visible locations and pilot a management scheme to improve proper usage of cycle parking
- Provision of 24hr secure parking at all three P&R sites to encourage overnight use and facilitate extended operating hours
- Provision of a free park and ride concession
- Financial support for replacing uncompliant vehicles with compliant ones and electric charging points on private land
- Delivery and servicing plans for businesses

Relevant local concessions:

Concessions are under consideration for the following vehicle types until 01/01/2023:

CAZ C and D:

- Euro 4/5 diesel registered community transport providers - to maintain access for communities to schools, medical and community centres and religious establishments.
- Euro 4/5 diesel commercial vehicles subject to a failed loan application.

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
<p>More information is needed about the potential impacts on people in the following protected characteristic groups:</p> <ul style="list-style-type: none"> • Religious groups • Black and Ethnic Minority Groups • Rural Communities • Pregnancy and Maternity 	Targeted consultation and further liaison with the Council's Research and Intelligence Team	By the end of the public consultation period (26 November 2018)	Cathryn Brown	26 November 2018	26 November 2018
Are there possible mitigations which have been missed?	Development of ideas through feedback received during the public consultation	By the end of the public consultation period (26 November 2018)	Cathryn Brown	26 November 2018	Ongoing
Disproportionate impact on disabled people who do not use a specific vehicle but are	Work with Central Government to ensure that a system is in place	To be developed and peer group tested by July 2019	Chris Major	July 2019	

transported by others in their vehicle	to allow a blue badge to be registered to any vehicle the holder is travelling in				
Specific impact on those in the lowest socio economic groups	Targeted financial assistance for those who need it most to be developed in consultation with groups affected	To be defined through the engagement and consultation processes and be in place in advance of the zone going live in late 2020	Ashley Beighton	First milestone FBC delivery c.Aug 2019	
Specific impact on businesses, particularly small businesses	Targeted financial assistance for those who need it most to be developed in consultation with groups affected	To be defined through the engagement and consultation processes and be in place in advance of the zone going live in late 2020	Ashley Beighton	First milestone FBC delivery c.Aug 2019	

5. Signed

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

Date: 20 February 2019