

## Equality Impact Assessment / Equality Analysis

<b>Title of service or policy</b>	The implementation of a Clean Air Zone (CAZ) in Bath and North East Somerset
<b>Team</b>	Development and Public Protection/Highways and Transportation
<b>Officer leading the completion of the EqIA</b>	Cathryn Brown, CAZ Manager
<b>Date of assessment</b>	Updated April 2021

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 to align with the launch of the Clean Air Zone in Bath on 15 March 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.

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

<b>1.</b>	<b>The aims of the policy or service</b>
1.1	<p><b><i>Background</i></b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Nitrogen dioxide and particulate matter are the pollutants which are identified as presenting the highest risk and these are</li> </ul>

	<p>monitored throughout the authority. Exposure to high levels of NO<sub>2</sub> 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).</p> <ul style="list-style-type: none"> <li>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.</li> <li>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 review 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 as the CAZ scheme progresses towards achieving compliance with the Ministerial Directions issued to B&amp;NES Council.</li> </ul>
1.2	<b><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></b>
1.3	<ul style="list-style-type: none"> <li>The implementation of this policy must be delivered through engagement with communities within B&amp;NES. This will be completed by teams across the Council, with support from external organisations such as the Joint Air Quality Unit (JAQU), DVLA, Highways England, neighbouring local authorities and transport operators.</li> <li>The intended outcome of this policy is to achieve compliance with the Ministerial Directions served on the Council by DEFRA and DfT (known as the Joint Air Quality Unit) in 2017 and 2019. The Directions are served under the Environment Act 1995.</li> </ul>
1.4	<b><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></b>
1.5	<ul style="list-style-type: none"> <li>This is the introduction of a new policy which is required following the service of Ministerial Directions referred to in 1.2 above.</li> <li>The Council is one of several local authorities served with such Directions, as part of the National Air Quality Plan, to</li> </ul>

	<p>deliver compliance with the national air quality objective for nitrogen dioxide in the shortest time possible and by 2021 at the latest.</p> <ul style="list-style-type: none"> <li>• Technical assessment and modelling confirmed that in order to achieve the required reduction in NO<sub>2</sub> concentrations, a Clean Air Zone was required where drivers of certain higher emission vehicles are charged for entering a defined geographical zone in the city. In addition to this charging measure, a suite of non-charging measures has been introduced to support the necessary behaviour change from the public and businesses. The Council has also crafted a suite of exemptions, some temporary, to mitigate any negative impacts for groups through the introduction of the scheme.</li> <li>• The Ministerial Directions have required the Council to identify a preferred option that will deliver the necessary compliance in the shortest time possible. The Council's Cabinet decided upon the preferred option of a Charging Class C CAZ with traffic management in March 2019. A public consultation on the Charging Order for the CAZ was carried out in September 2019 and the Full Business Case (FBC) for a Charging Class C CAZ with traffic management was confirmed by Cabinet in January 2020. The Clean Air Zone scheme was launched on 15 March 2021.</li> </ul>
1.6	<b><i>Do the aims of this policy link to or conflict with any other policies of the Council?</i></b>
1.7	<p>This policy has links at both the sub-regional and local level:</p> <p><b>Sub-regional:</b></p> <ul style="list-style-type: none"> <li>• The West of England LEP's Strategic Economic Plan (2015-30), which establishes the economic vision for the sub-region.</li> <li>• The West of England Joint Local Transport Plan (2011-26), which sets out the transport priorities for the sub-region.</li> <li>• Partnership arrangements to identify the economic development and growth projections for the sub-region.</li> <li>• 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.</li> </ul> <p><b>Local:</b></p> <ul style="list-style-type: none"> <li>• B&amp;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.</li> <li>• B&amp;NES Getting Around Bath (GAB) Transport Strategy, which aims to 'enhance Bath's unique status by adopting</li> </ul>

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. It is proposed that all Penalty Charge Notice charges incurred as a result of the Clean Air Zone will be managed by an online system which can be accessed at the One Stop Shop locations.
- 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.
- The pandemic during 2020 and 2021 has required adjustments to project delivery to ensure that groups are not disadvantaged by the introduction of the Clean Air Zone scheme during the pandemic. Specific reference has been made to these adjustments in the review of the protective characteristics below.

<b>2. Consideration of available data, research and information</b>		
<b>Key questions</b>		<b>Data, research and information that you can refer to</b>
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 <a href="http://www.bathnes.gov.uk/services/your-council-and-democracy/local-research-and-statistics/census-and-population">http://www.bathnes.gov.uk/services/your-council-and-democracy/local-research-and-statistics/census-and-population</a>
2.4	What other data do you have?	As part of the Final Business Case (FBC) for the Clean Air Zone, 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 Class C CAZ and is appended to the FBC. This analysis has been used to inform the development of the Equalities Impact Assessment.
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 Clean Air Zone 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 Outline Business Case (OBC) and FBC and are available on the Council's webpages <a href="https://beta.bathnes.gov.uk/policy-and-documents-library/baths-clean-air-zone">https://beta.bathnes.gov.uk/policy-and-documents-library/baths-clean-air-zone</a>
2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations	<ul style="list-style-type: none"> <li>Formal periods of public consultation have taken place in October-November 2018 and September-October 2019. Through these consultations, contacts have been made with specific organisations to better understand both the positive and negative impacts of introducing a charging Clean Air Zone. Whilst there will be no further formal public consultations following the decision on the FBC, there will be ongoing engagement and communication with organisations and communities during the life of the scheme.</li> <li>Such organisations include taxi operators, community transport providers, healthcare providers and charities (this is not intended to be an exhaustive list).</li> </ul>

	within this?	<ul style="list-style-type: none"> <li>• All consultation documents have been made accessible via the Council’s website, One Stop Shops and libraries. During the last consultation in 2019, 25 paper surveys were completed and over 600 surveys were completed online.</li> <li>• Communication regarding any decision and implementation process relating to the charging Clean Air Zone, 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).</li> </ul>
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<b>3</b>	<p><b>Assessment of impact:</b></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	An initial screening process for each of the protected characteristics was carried out and has been updated.
3.2	<b>Potential positive impacts:</b>
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 C 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"> <li>• Age</li> <li>• Disability</li> <li>• Pregnancy and Maternity</li> </ul> <p>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. An extensive monitoring and evaluation programme has been developed, where additional air quality monitoring sites and automatic traffic counters have been installed to understand if the modelling outcomes are as expected.</p> <p>Other positive impacts are likely to include small scale public transport accessibility benefits due to a reduction in traffic volumes within the Clean Air Zone area and impacts of the supporting abatement measures. 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.</p>

3.4	<b>Potential negative impacts:</b>
3.5	<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"> <li>• Age</li> <li>• Disability</li> <li>• Race</li> <li>• Residents living outside of the proposed CAZ</li> <li>• Businesses</li> </ul> <p>This review of the EqIA also considers the impacts of the pandemic throughout 2020 and 2021 and details further mitigations which are being offered to affected residents, businesses and organisations.</p>

<b>4</b>	<b><i>Gender – identify the impact/potential impact of the policy on women and men.</i></b>
4.1	<b><i>Details of the impact</i></b>
4.2	No identified impact.

<b>5</b>	<b><i>Pregnancy and maternity</i></b>
5.1	<b><i>Details of the impact</i></b>
5.2	<ul style="list-style-type: none"> <li>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).</li> <li>Therefore, the reduction in nitrogen dioxide levels brought about by compliance with the Ministerial Directions should have a positive impact on people within this protective characteristic group.</li> <li>Under a charging Class C CAZ, it is possible that some people may experience problems in accessing medical appointments, toddler groups or other support networks for parents, because of impacts on community transport and health care providers and voluntary groups.</li> </ul>
5.3	<b><i>What steps have been or could be taken to address the impacts?</i></b>
5.4	<p>Ongoing consultation with the Council's Independent Equality Advisory Group (this is the Council's forum for equality issues).</p> <p><b>Relevant mitigation measures</b> funded from the Clean Air Fund:</p> <p>Financial assistance through an interest free loan and/or grant for transport providers to upgrade to a compliant vehicle.</p> <p><b>Relevant exemptions:</b></p> <ul style="list-style-type: none"> <li>Vehicles for disabled people which are exempt from vehicle road tax;</li> <li>A range of targeted exemptions for up to two years from the launch date for those supporting vital services and disadvantaged groups i.e. community transport, blue badge holders, community-based education, health or social care service providers, those supporting the emergency services, wheelchair accessible taxis, recovery vehicles, showman's vehicles, general haulage vehicles and special vehicles;</li> <li>A targeted exemption through to the expected vehicle handover date or up to two years from the launch date at the latest for those accepted for the financial assistance scheme but who need to wait for a vehicle to be manufactured and delivered;</li> <li>A general 'means-tested' exemption for everyone (except those with pre-Euro 4 vehicles manufactured before approx.</li> </ul>

2005/6) that is also accessed via the financial assistance scheme i.e. if a vehicle owner or operator passes the eligibility checks but fails the affordability checks, they are able to apply for a temporary exemption for up to two years from the launch date;

- Further short-term term exemptions have been granted due to the impacts of the pandemic on businesses; these have included extra time to complete telematics assessments to access financial assistance and extra time to allow businesses to begin operating again following the lifting of Covid-19 restrictions.

Access to CAZ teams have been extended during the pandemic i.e. weekend cover has been provided so that queries can be answered promptly to reduce stress for vulnerable customers. Extra time has also been provided for customers to respond.

<b>6</b>	<b>Disability</b>															
6.1	<b><i>Details of the impact</i></b>															
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&amp;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: <a href="https://digital.nhs.uk/data-and-information/publications/statistical/quality-and-outcomes-framework-achievement-prevalence-and-exceptions-data/2017-18">https://digital.nhs.uk/data-and-information/publications/statistical/quality-and-outcomes-framework-achievement-prevalence-and-exceptions-data/2017-18</a>  *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"> <li>• 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.</li> <li>• The Distribution and Equality Impact Analysis also indicates that communities with a high disability ratio are located throughout the Clean Air Zone area and are particularly concentrated in central Bath and on the western periphery of the city. Therefore, the disabled population in central Bath may suffer from reduced accessibility with the implementation of the proposed Clean Air Zone scheme, due to more limited choices on modes of compliant transport.</li> <li>• For a 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.</li> </ul>	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	<b><i>What steps have been or could be taken to address the impacts?</i></b>															
6.4	<p>Ongoing consultation with the Council's Independent Equality Advisory Group (this is the Council's forum for equality issues).</p> <p><b>Relevant mitigation measures</b> funded from the Clean Air Fund:</p>															

Financial assistance through an interest free loan and/or grant for transport providers to upgrade to a compliant vehicle.

**Relevant exemptions:**

- Vehicles for disabled people which are exempt from vehicle road tax;
- A range of targeted exemptions for up to two years from the launch date for those supporting vital services and disadvantaged groups i.e. community transport, blue badge holders, community-based education, health or social care service providers, those supporting the emergency services, wheelchair accessible taxis, recovery vehicles, showman's vehicles, general haulage vehicles and special vehicles;
- A targeted exemption through to the expected vehicle handover date or up to two years from the launch date at the latest for those accepted for the financial assistance scheme but who need to wait for a vehicle to be manufactured and delivered;
- A general 'means-tested' exemption for everyone (except those with pre-Euro 4 vehicles manufactured before approx. 2005/6) that is also accessed via the financial assistance scheme i.e. if a vehicle owner or operator passes the eligibility checks but fails the affordability checks they are able to apply for a temporary exemption for up to two years from the launch date;
- A process has been introduced to permit an exemption for blue badge holders, which acknowledges that they may be unable to visit Council offices to provide evidence to support the exemption application during the pandemic;
- The team are continually improving accessibility to our exemption processes; for example, holders of a blue badge exemption are required to log each journey into the Clean Air Zone. This requires a text service using a short code telephone number, which may be difficult to access for customers, depending upon the mobile phone provider. At the time of updating, this is being reviewed to understand if there is an easier way to achieve this. CAZ team members can do this on behalf of the applicant if necessary;
- Further short-term term exemptions have been granted due to the impacts of the pandemic on businesses; these have included extra time to complete telematics assessments to access financial assistance and extra time to allow businesses to begin operating again following the lifting of Covid-19 restrictions.

Access to CAZ teams have been extended during the pandemic i.e. weekend cover has been provided so that queries can be

	answered promptly to reduce stress for vulnerable customers. Extra time has also been provided for customers to respond.
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<b>7</b>	<b>Age</b>
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<b>7.1</b>	<b><i>Details of the impact</i></b>
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<b>7.2</b>	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> ).
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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>

Further, there is evidence to suggest that the elderly are disproportionately affected by the public health impacts of air pollution (*Simoni et al., Adverse effects of outdoor pollution in the elderly, Journal of Thoracic Disease, January 2015*).

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%. (Source: B&NES JSNA)

	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%

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.

- There are likely to be small scale public transport accessibility benefits due to a reduction in traffic volumes within the Clean Air Zone area and impacts of the supporting abatement measures. 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

	<p>in accessibility could hinder their ability to reach such facilities. This is likely to be an impact under a charging Class C CAZ because of impacts on community transport providers.</p> <ul style="list-style-type: none"> <li>• The charging Class C CAZ results in both motor traffic flow increases and decreases in central Bath due to the Clean Air Zone 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.</li> <li>• Under the charging Class C CAZ scheme, 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.</li> </ul>
7.2	<p><b><i>What steps have been or could be taken to address the impacts?</i></b></p>
7.3	<p>Ongoing consultation with the Council’s Independent Equality Advisory Group (this is the Council’s forum for equality issues).</p> <p><b>Relevant mitigation measures</b> funded from the Clean Air Fund:</p> <p>Financial assistance through an interest free loan and/or grant for transport providers to upgrade to a compliant vehicle.</p> <p><b>Relevant exemptions:</b></p> <ul style="list-style-type: none"> <li>• Vehicles for disabled people which are exempt from vehicle road tax;</li> <li>• A range of targeted exemptions for up to two years from the launch date for those supporting vital services and disadvantaged groups i.e. community transport, blue badge holders, community-based education, health or social care service providers, those supporting the emergency services, wheelchair accessible taxis, recovery vehicles, showman's vehicles, general haulage vehicles and special vehicles;</li> <li>• A targeted exemption through to the expected vehicle handover date or up to two years from the launch date at the latest for those accepted for the financial assistance scheme but who need to wait for a vehicle to be manufactured and delivered;</li> </ul>

	<ul style="list-style-type: none"> <li>• A general ‘means-tested’ exemption for everyone (except those with pre-Euro 4 vehicles manufactured before approx. 2005/6) that is also accessed via the financial assistance scheme i.e. if a vehicle owner or operator passes the eligibility checks but fails the affordability checks they are able to apply for a temporary exemption for up to two years from the launch date;</li> <li>• Further short-term term exemptions have been granted due to the impacts of the pandemic on businesses; these have included extra time to complete telematics assessments to access financial assistance and extra time to allow businesses to begin operating again following the lifting of Covid-19 restrictions.</li> </ul> <p>Access to CAZ teams have been extended during the pandemic i.e. weekend cover has been provided so that queries can be answered promptly to reduce stress for vulnerable customers. Extra time has also been provided for customers to respond.</p>
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<b>8</b>	<b>Race</b>
8.1	<b><i>Details of the impact</i></b>
8.2	<p>The B&amp;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 &amp; 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&amp;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.</p>
8.3	<b><i>What steps have been or could be taken to address the impacts?</i></b>
8.4	<p>Ongoing consultation with the Council’s Independent Equality Advisory Group (this is the Council’s forum for equality issues).</p> <p><b>Relevant mitigation measures</b> funded from the Clean Air Fund:</p>

Financial assistance through an interest free loan and/or grant for transport providers to upgrade to a compliant vehicle.

**Relevant exemptions:**

- Vehicles for disabled people which are exempt from vehicle road tax;
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- A general 'means-tested' exemption for everyone (except those with pre-Euro 4 vehicles manufactured before approx. 2005/6) that is also accessed via the financial assistance scheme i.e. if a vehicle owner or operator passes the eligibility checks but fails the affordability checks they are able to apply for a temporary exemption for up to two years from the launch date;
- Further short-term term exemptions have been granted due to the impacts of the pandemic on businesses; these have included extra time to complete telematics assessments to access financial assistance and extra time to allow businesses to begin operating again following the lifting of Covid-19 restrictions.

Translation/interpretation services have also been made available to facilitate applications for exemptions, where English is not the applicant's first language.

<b>9</b>	<b><i>Religion/belief</i></b>
9.1	<b><i>Details of the impact</i></b>
9.2	<p>A number of faith-based venues are located within the proposed boundary of the Clean Air Zone, 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 an impact under a charging Class C CAZ as community transport providers are impacted.</p>
9.3	<b><i>What steps have been or could be taken to address the impacts?</i></b>
9.4	<p>Ongoing consultation with the Council's Independent Equality Advisory Group (this is the Council's forum for equality issues).</p> <p><b>Relevant mitigation measures</b> funded from the Clean Air Fund:</p> <p>Financial assistance through an interest free loan and/or grant for transport providers to upgrade to a compliant vehicle.</p> <p><b>Relevant exemptions:</b></p> <ul style="list-style-type: none"> <li>• Vehicles for disabled people which are exempt from vehicle road tax;</li> <li>• A range of targeted exemptions for up to two years from the launch date for those supporting vital services and disadvantaged groups i.e. community transport, blue badge holders, community-based education, health or social care service providers, those supporting the emergency services, wheelchair accessible taxis, recovery vehicles, showman's vehicles, general haulage vehicles and special vehicles;</li> <li>• A targeted exemption through to the expected vehicle handover date or up to two years from the launch date at the latest for those accepted for the financial assistance scheme but who need to wait for a vehicle to be manufactured and delivered;</li> <li>• A general 'means-tested' exemption for everyone (except those with pre-Euro 4 vehicles manufactured before approx. 2005/6) that is also accessed via the financial assistance scheme i.e. if a vehicle owner or operator passes the eligibility checks but fails the affordability checks they are able to apply for a temporary exemption for up to two years from the launch date;</li> </ul>

	<ul style="list-style-type: none"> <li>• Further short-term term exemptions have been granted due to the impacts of the pandemic on businesses; these have included extra time to complete telematics assessments to access financial assistance and extra time to allow businesses to begin operating again following the lifting of Covid-19 restrictions;</li> </ul> <p>Information has been provided to applicants when concern has been raised about the implementation of the scheme and how this could impact on religious customs/rules. For example, confirmation has been sought from a local Imam that the financial assistance scheme does not conflict with Sharia law.</p>
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<b>10</b>	<b><i>Sexual orientation; marriage and civil partnership and transgender people</i></b>
10.1	<b><i>Details of the impact</i></b>
10.2	No identified impact.

<b>11</b>	<b><i>Whilst not protected characteristics, the Council has chosen to include the following issues because of the distinctive context of B&amp;NES.</i></b>
11.1	<b><i>Socio-economically disadvantaged –factors like family background, educational attainment, neighbourhood, employment status can influence life chances</i></b>
11.2	<b><i>Details of the impact</i></b>
11.3	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• There are also areas of income deprivation in central Bath too (albeit less severe than on the western periphery of the city). Under the scheme 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.</li> <li>• There are likely to be small scale public transport accessibility benefits due to a reduction in traffic volumes within the</li> </ul>

	<p>CAZ area and impacts of the supporting abatement measures. These benefits are likely to be concentrated on existing bus users who are typically more likely to include lower income groups.</p> <ul style="list-style-type: none"> <li>• 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 impact could be exacerbated by the COVID-19 outbreak.</li> <li>• In addition, sole traders who own non-compliant LGV's could experience affordability impacts under the scheme, which again could be exacerbated the COVID-19 outbreak.</li> </ul>
11.4	<p><b><i>What steps have been or could be taken to address the impacts?</i></b></p>
11.5	<p>Ongoing consultation with the Council's Independent Equality Advisory Group (this is the Council's forum for equality issues).</p> <p><b>Relevant mitigation measures</b> funded from the Clean Air Fund:</p> <p>Financial assistance through an interest free loan and/or grant for transport providers to upgrade to a compliant vehicle.</p> <p><b>Relevant exemptions:</b></p> <ul style="list-style-type: none"> <li>• Vehicles for disabled people which are exempt from vehicle road tax;</li> <li>• A range of targeted exemptions for up to two years from the launch date for those supporting vital services and disadvantaged groups i.e. community transport, blue badge holders, community-based education, health or social care service providers, those supporting the emergency services, wheelchair accessible taxis, recovery vehicles, showman's vehicles, general haulage vehicles and special vehicles;</li> <li>• A targeted exemption through to the expected vehicle handover date or up to two years from the launch date at the latest for those accepted for the financial assistance scheme but who need to wait for a vehicle to be manufactured and delivered;</li> <li>• A general 'means-tested' exemption for everyone (except those with pre-Euro 4 vehicles manufactured before approx. 2005/6) that is also accessed via the financial assistance scheme i.e. if a vehicle owner or operator passes the</li> </ul>

eligibility checks but fails the affordability checks they are able to apply for a temporary exemption for up to two years from the launch date.

- Further short-term term exemptions have been granted due to the impacts of the pandemic on businesses; these have included extra time to complete telematics assessments to access financial assistance and extra time to allow businesses to begin operating again following the lifting of Covid-19 restrictions.

**Additional measures:**

- Access to CAZ teams have been extended during the pandemic i.e. weekend cover has been provided so that queries can be answered promptly to reduce stress for customers. Extra time has also been provided for customers to respond;
- 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.

<b>12</b>	<b><i>Rural communities – identify the impact/ potential impact on people living in rural communities</i></b>
<b>12.1</b>	<b><i>Details of the impact</i></b>
<b>12.2</b>	<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 C CAZ if community transport and taxis are impacted.</p>
<b>12.3</b>	<b><i>What steps have been or could be taken to address the impacts?</i></b>
<b>12.4</b>	<p>Ongoing dialogue with the relevant Area Forums.</p> <p><b>Relevant mitigation measures</b> funded from the Clean Air Fund:</p> <p>Financial assistance through an interest free loan and/or grant for transport providers to upgrade to a compliant vehicle.</p> <p><b>Relevant exemptions:</b></p> <ul style="list-style-type: none"> <li>• Vehicles for disabled people which are exempt from vehicle road tax;</li> <li>• A range of targeted exemptions for up to two years from the launch date for those supporting vital services and disadvantaged groups i.e. community transport, blue badge holders, community-based education, health or social care service providers, those supporting the emergency services, wheelchair accessible taxis, recovery vehicles, showman's vehicles, general haulage vehicles and special vehicles;</li> <li>• A targeted exemption through to the expected vehicle handover date or up to two years from the launch date at the latest for those accepted for the financial assistance scheme but who need to wait for a vehicle to be manufactured and delivered;</li> <li>• A general 'means-tested' exemption for everyone (except those with pre-Euro 4 vehicles manufactured before approx. 2005/6) that is also accessed via the financial assistance scheme i.e. if a vehicle owner or operator passes the eligibility checks but fails the affordability checks they are able to apply for a temporary exemption for up to two years from the launch date.</li> <li>• Further short-term term exemptions have been granted due to the impacts of the pandemic on businesses; these have included extra time to complete telematics assessments to access financial assistance and extra time to allow businesses to begin operating again following the lifting of Covid-19 restrictions.</li> </ul>

	Access to CAZ teams have been extended during the pandemic i.e. weekend cover has been provided so that queries can be answered promptly to reduce stress for customers. Extra time has also been provided for customers to respond.
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<b>13</b>	<b>Residents living in Bath</b>
<b>13.1</b>	<b><i>Details of the impact</i></b>
<b>13.2</b>	<p>This group of people benefit from improvements to air quality from reductions in circulating traffic through modal shift and avoidance.</p> <p>Under a charging Class C CAZ there could be:</p> <ul style="list-style-type: none"> <li>• Increased availability of on street parking spaces for permit holders from greater car park and park and ride usage.</li> <li>• Reduction in circulating traffic looking for a free space and decreased congestion from greater car park and park and ride usage.</li> <li>• Increased costs for entering the CAZ if either residents or contractors do not own a compliant vehicle. Contractors could pass these costs onto customers.</li> </ul>
<b>13.3</b>	<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><b>Relevant mitigation measures</b> funded from the Clean Air Fund:</p> <p>Financial assistance through an interest free loan and/or grant for transport providers to upgrade to a compliant vehicle.</p> <p><b>Relevant exemptions:</b></p> <ul style="list-style-type: none"> <li>• Vehicles for disabled people which are exempt from vehicle road tax;</li> <li>• A range of targeted exemptions for up to two years from the launch date for those supporting vital services and disadvantaged groups i.e. community transport, blue badge holders, community-based education, health or social care service providers, those supporting the emergency services, wheelchair accessible taxis, recovery vehicles, showman's vehicles, general haulage vehicles and special vehicles;</li> <li>• A targeted exemption through to the expected vehicle handover date or up to two years from the launch date at the</li> </ul>

	<p>latest for those accepted for the financial assistance scheme but who need to wait for a vehicle to be manufactured and delivered;</p> <ul style="list-style-type: none"> <li>• A general 'means-tested' exemption for everyone (except those with pre-Euro 4 vehicles manufactured before approx. 2005/6) that is also accessed via the financial assistance scheme i.e. if a vehicle owner or operator passes the eligibility checks but fails the affordability checks they are able to apply for a temporary exemption for up to two years from the launch date.</li> </ul> <p><b>Additional measures:</b></p> <ul style="list-style-type: none"> <li>• A postcard was mailed to all addresses in B&amp;NES during November 2020 to raise awareness of the scheme;</li> <li>• Early warning signage about the implementation of the scheme on 15 March 2021 has been erected in Bath since December 2020;</li> <li>• Approximately 9000 Early Notice Letters have been provided to drivers of non-compliant vehicles entering the CAZ during February 2021, to raise their awareness about the scheme going live and the existence of the financial assistance scheme to support them upgrade to a compliant vehicle;</li> <li>• Access to CAZ teams have been extended during the pandemic i.e. weekend cover has been provided so that queries can be answered promptly to reduce stress for vulnerable customers. Extra time has also been provided for customers to respond.</li> </ul>
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<b>14</b>	<b>Residents living outside of the proposed zone</b>
<b>14.1</b>	<b><i>Details of the impact</i></b>
<b>14.2</b>	Increased potential for non-compliant vehicles to enter residential areas, looking for a diversion route or parking outside of the Clean Air Zone.
<b>14.3</b>	<b><i>What steps have been or could be taken to address the impacts?</i></b>
<b>14.4</b>	Attendance at Residents Association and Area Forum meetings to explain the purpose of the Clean Air Zone and encourage feedback.
	<b>Mitigations:</b>

	<ul style="list-style-type: none"> <li>• Amendment of the CAZ boundary to include the Pulteney Estates Area, Bathwick, Sydney Place and Oldfield Park areas</li> <li>• Review and extension of Resident's Parking Zones.</li> </ul>
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<b>15</b>	<b>Businesses</b>
<b>15.1</b>	<b><i>Details of the impact</i></b>
<b>15.2</b>	<p>The introduction of a Clean Air Zone could bring positive impacts:</p> <ul style="list-style-type: none"> <li>• Increased availability of on street parking spaces for customers with compliant vehicles looking for short term 'pop and shop' parking.</li> <li>• Reduction in circulating traffic looking for a free space and decreased congestion.</li> <li>• Improvements to air quality from reduction in circulating traffic resulting in longer dwell times.</li> </ul> <p>There could also be negative impacts including:</p> <ul style="list-style-type: none"> <li>• The perception that the Clean Air Zone could deter footfall in central Bath as consumers and tourists opt to visit alternative locations.</li> <li>• 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).</li> <li>• Impacts on a range of businesses located outside the Clean Air Zone that require routing of LGVs/HGVs through the Clean Air Zone 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 Clean Air Zone based on their geographical location within the Clean Air Zone, their business practices may mean regular entry to the Clean Air Zone, potentially resulting in charges being imposed.</li> </ul>

	<ul style="list-style-type: none"> <li>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 Clean Air Zone.</li> </ul> <p>All of these negative impacts are likely to have been exacerbated by the impact of the COVID-19 pandemic.</p>
15.3	<b><i>What steps have been or could be taken to address the impacts?</i></b>
15.4	<p><b>Engagement with:</b></p> <ul style="list-style-type: none"> <li>Various Council departments including the Heritage Services and Economic Regeneration teams,</li> <li>Bath Business Improvement District,</li> <li>Bus, coach and taxi operators</li> <li>Major employers e.g. Royal Mail</li> </ul> <p><b>Relevant mitigation measures</b> funded from the Clean Air Fund:</p> <ul style="list-style-type: none"> <li>Financial assistance through an interest free loan and/or grant for transport providers to upgrade to a compliant vehicle;</li> <li>Expanding the last mile delivery services available in the city through a funding bid to central government in February 2021.</li> </ul> <p><b>Relevant exemptions:</b></p> <ul style="list-style-type: none"> <li>Vehicles for disabled people which are exempt from vehicle road tax;</li> <li>A range of targeted exemptions for up to two years from the launch date for those supporting vital services and disadvantaged groups i.e. community transport, blue badge holders, community-based education, health or social care service providers, those supporting the emergency services, wheelchair accessible taxis, recovery vehicles, showman's vehicles, general haulage vehicles and special vehicles;</li> <li>A targeted exemption through to the expected vehicle handover date or up to two years from the launch date at the latest for those accepted for the financial assistance scheme but who need to wait for a vehicle to be manufactured and</li> </ul>

delivered;

- A general 'means-tested' exemption for everyone (except those with pre-Euro 4 vehicles manufactured before approx. 2005/6) that is also accessed via the financial assistance scheme i.e. if a vehicle owner or operator passes the eligibility checks but fails the affordability checks they are able to apply for a temporary exemption for up to two years from the launch date.

**Additional measures:**

- A telemarketing company was procured to contact over 9000 businesses in the 6 months before the scheme to make them aware of its introduction and the financial assistance which could be made available to them
- The Project Team continue to be flexible in approach in responding to the impacts of the pandemic and the timing of lifting of restrictions, particular for sectors like hospitality.

## 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>Ongoing collection of information about the potential impacts on people in the following protected characteristic groups:</p> <ul style="list-style-type: none"> <li>• Disability</li> <li>• Age</li> <li>• Black and Ethnic Minority Groups</li> <li>• Rural Communities</li> <li>• Pregnancy and Maternity</li> <li>• Businesses</li> </ul>	Ongoing engagement with impacted groups	At implementation stage; 6 months post-launch date;	Cathryn Brown	September 2021	
Are there possible mitigations which have been missed?	Development of ideas through feedback received during the early days of the launch of the scheme	6 months post-launch date;	Cathryn Brown	September 2021	

Disproportionate impact on disabled people who do not use a specific vehicle but are transported by others in their vehicle	Work with Central Government to ensure that a system is in place to allow a blue badge to be registered to any vehicle the holder is travelling in	To be developed and peer group tested	Chris Major	Ongoing	
Specific impact on those in the lowest socio-economic groups, especially in light of the pandemic	Targeted financial assistance for those who need it most to be developed in consultation with groups affected	To be defined through the ongoing engagement processes and be in place prior to launch and at least during the first 6 months of the scheme	Ashley Beighton	Ongoing	
Specific impact on businesses, particularly small businesses and especially in light of the pandemic	Targeted financial assistance for those who need it most to be developed in consultation with groups affected	To be defined through the ongoing engagement processes and be in place prior to launch and at least during the first 6 months of the scheme	Ashley Beighton	Ongoing	

## 5. Signed

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

**Date:** April 2021