

INITIAL EQUALITY IMPACT ASSESSMENT AND ANALYSIS (EqIAA)

South Gloucestershire Consultation Draft Clean Air Action Plan 2022-2026

SECTION 1 - INTRODUCTION

The draft Clean Air Action Plan (CAAP) has been developed to implement the visions and priorities of the South Gloucestershire Clean Air Strategy 2020-24 which was approved by the Council in July 2020. The CAAP also fulfils the Council's statutory local air quality management duties to update the existing 2012 Air Quality Action Plan (AQAP), which focuses on the Air Quality Management Areas (AQMA) in Staple Hill and Kingswood (prior to its extension to Warmley).

The CAAP is the mechanism through which the CAS vision and principles will be implemented. The Clean Air Strategy (CAS) broadens the focus in terms of pollutants and geographically by considering five important air pollutants; nitrogen dioxide (NO₂), particulate matter (PM_{2.5}, PM₁₀), sulphur dioxide, ammonia and non-methane volatile organic compounds throughout the whole of South Gloucestershire. The CAAP aims to continue this broadened focus across the South Gloucestershire area as well as in the AQMA.

The Clean Air and Climate Change steering group, which was established in July 2019, has supported the CAS and CAAP development so that the vision and aims reflect the broad impacts that air pollution can have, and to enable the CAS and CAAP to be governed jointly.

All public authorities have a legal duty to understand the effect of their policies and practices on people with characteristics that are protected under the Equality Act 2010 so they can act appropriately to eliminate inequalities. Air pollution is harmful to our health, the environment, and the economy and can cause significant inequalities by affecting some groups of people more than others, making this EqIAA essential.

Please Note:-

This is an initial assessment of equalities impacts in relation to the Clean Air Action Plan, we would welcome comments on how any aspect of the CAAP may impact on the protected characteristic groups highlighted within this document.

Any feedback in relation to equalities and any point raised within this document will feed into and inform a full Equality Impact Assessment and Analysis.

You can find out more and tell us your views by completing our survey online at <https://consultations.southglos.gov.uk/CAAP22> or sending your comments to:

Email: consultation@southglos.gov.uk

Write to: South Gloucestershire Council, Insight and Engagement Team, Council offices, Badminton Road, Yate, BRISTOL, BS37 5AF

Copies of the consultation are available from your local library or one stop shop.

The consultation on these proposals starts on 6th December 2022 and closes on 31st January 2023

SECTION 2 – RESEARCH, ENGAGEMENT AND CONSULTATION

The Clean Air Strategy was produced as evidence derived from a Gap Analysis and close working partnerships, including liaison with local councillors, third-sector, business representatives and an academic institution showed that implementation of a strategy would improve the health of local people and communities by improving the co-ordination of activities which impact on air quality. The CAAP is the mechanism through which the CAS vision and principles will be implemented.

The CAS vision is:

Protecting and enhancing health and wellbeing, the environment, and sustainable economic growth through improved air quality across South Gloucestershire.

The eight CAS principles that guide the CAAP are:

1. It is better to reduce air pollution at source than to mitigate the consequences
2. Different air pollutants should be considered and tackled together
3. Any improvement in air quality will have positive consequences but those with co-benefits should be prioritised (e.g., Active travel options which improve air pollution and increase the amount of physical activity people take)
4. Small effects across the population are likely to bring about greater change than large effects for a few individuals
5. Actions need to be wider than just within AQMAs
6. Effective strategies require a coherent approach
7. Everyone has a role to play
8. As action is taken some groups may need particular support

Internal Consultation was conducted as part of the development of the Clean Air Action Plan, with Cabinet members and through two sessions with Scrutiny members in a Clean Air Task and Finish group. Their comments and feedback have been incorporated into the draft CAAP.

We are all affected by the quality of the air we breathe so the whole population is at risk; but some groups are more vulnerable than others (see Table 1). Globally, those who live in deprived areas, poor quality housing, or live, work or learn near busy roads are also more vulnerable to health effects, even though they are less likely to have caused the pollution. For example, the two AQMAs in South Gloucestershire align with two of the priority neighborhoods (Staple Hill and Kingswood). Air quality has a direct impact on health and ultimately life expectancy.

In respect of the Protected Characteristics as set out in the Equality Act 2010, it is considered that the following are of particular importance in respect of the topic of 'Clean Air':

DISABILITY

People with cardiovascular and respiratory disease are more likely to be affected by air pollution. Fine particulate matter (PM_{2.5}) passes through the lungs into the circulation along with toxic gases such as NO₂, and together this initiate, accelerate, and exacerbate non-communicable diseases.

There is an increased risk of asthma attacks on high pollution days and more hospital admissions for heart and lung diseases. Polluted air triggers strokes and heart attacks, exacerbates respiratory illnesses, such as chronic obstructive pulmonary disease, and can stunt children's lung growth.

AGE (OLDER AND YOUNGER)

Researchers have found that children are exposed to higher levels of pollution, particularly when walking to school and in the playground. The effects of this pollution are more serious on children

than on adults. Exposure to air pollution at a young age can hinder lung growth, inhibit brain development, and increase the risk of respiratory conditions such as asthma and pneumonia.

Older people are disproportionately affected by air pollution. Exposure to air pollution has been associated with cognitive decline and increased strokes. Older people are more vulnerable to air pollution partly because they are a group of people with long-term conditions occurring at the same time, such as high blood pressure, diabetes, and heart disease. Compared to younger people, older people have an increased risk of hospitalisation when there are high levels of particulate matter in the air.

PREGNANCY AND MATERNITY

Air pollution can affect the health of the pregnant person and the developing baby. Air pollution can negatively affect pregnancy possibly leading to preterm birth, a low birth weight, stillbirth, or congenital abnormalities. Contaminants in the air can cross the placenta disrupting the baby's development. The specific effects of air pollution depend on several factors, including:

- When in development the baby has exposure to the pollutant
- How long the exposure lasts, and how much pollution there is
- The specific pollutant

SOCIO-ECONOMIC

Air pollution, both outside and indoors, is a major driver of health inequalities.

In the UK, the most deprived communities are more likely to live in polluted areas. Those in lower socio-economic groups face financial hardship and can lack access to quality food, good prenatal care, safe housing which may intensify the effects of air pollution. In South Gloucestershire, the following groups are disproportionately more likely to be living in poverty/financial hardship:

- Females
- Disabled People
- People aged 25 – 44
- Asian/Asian British – Bangladeshi
- Black/African/Caribbean/Black British – African
- Black/African/Caribbean/Black British - Other
- Mixed/Multiple Ethnic Groups - White & Black Caribbean
- Mixed/Multiple Ethnic Groups - Other
- White - Gypsy or Irish Traveller
- White – Other
- Any Other ethnic group

The Clean Air Action Plan has potential to deliver a significant positive impact across protected characteristic groups in South Gloucestershire, particularly those identified above.

The impact on the Council's reputation will be negative if the Council fails to address the disproportionate impacts of air pollution upon members of the local population due to their age, disability, pregnancy status or wider socioeconomic factors. The financial implications are likely to increase over time due to the growing and aging population because demands on health and social care are likely to increase.

SECTION 3 - IDENTIFICATION & ANALYSIS OF EQUALITIES ISSUES AND IMPACTS

A summary of the likely impacts of air pollution from national evidence and data on groups in the population with protected characteristics is shown in Table 1; the table also shows impacts in respect of socioeconomic factors.

Table 1: Likely impacts from air pollution

Protected characteristic	Likely impact from air pollution	Explanation
Age	Direct	Children (e.g. developmental problems, asthma, and slower lung development) and older people (e.g. acceleration of reduced lung function and dementia, reduced life expectancy) are more vulnerable.
	Indirect	People in the younger age group 25-44 are disproportionately more likely to be living in poverty/financial hardship and in polluted areas.
Disability	Direct	People who already have illnesses (i.e. cardiovascular disease, respiratory disease) are more vulnerable.
	Indirect	Disabled people are disproportionately more likely to be living in poverty/financial hardship and in polluted areas.
Gender	Indirect	The prevalence of cardiovascular disease and respiratory disease differs between men and women, as does the type of occupation e.g. men may be more likely to do manual jobs or drive.
Gender reassignment	None expected	-
Marriage and civil partnership	None expected	-
Pregnancy and maternity	Direct	Foetus exposure to air pollution in the womb can lead to low birth weight and other complications. See above regarding impact on children.
Race	Indirect	People from the following minority ethnic groups are disproportionately more likely to be living in poverty/financial hardship and in polluted areas: <ul style="list-style-type: none"> • Asian/Asian British – Bangladeshi • Black/African/Caribbean/Black British – African • Black/African/Caribbean/Black British - Other • Mixed/Multiple Ethnic Groups - White & Black Caribbean • Mixed/Multiple Ethnic Groups - Other • White - Gypsy or Irish Traveller • White – Other • Any Other ethnic group
Religion or belief	Indirect	See above regarding race.
Sexual orientation	None expected	-

SECTION 4 - ACTIONS TO BE TAKEN AS A RESULT OF THIS EqIAA

The draft Clean Air Action Plan has been informed by the findings of the initial Clean Air Strategy EqIAA. An additional equalities assessment will be conducted in respect of any charging mechanisms if this is necessary.

An over-arching action is that we will ensure a robust approach to monitoring the future success of the Clean Air Action Plan is in place which specifically covers equalities issues and groups. There are a range of air pollution monitors as described in the Air Quality Annual Status Reports which enable geographical monitoring. Equalities issues can be extrapolated by mapping against known demographics.

The CAAP contains a total of 30 actions that have been classified under five headings related either to the pollutant source or type of action:

1. Emissions from new development and buildings
2. Emissions from transport
3. Communication and awareness raising
4. Emissions from solid fuel/solid waste disposal
5. Council policy and measures.

The impact of the proposed Clean Air Action Plan measures on protected characteristic groups have been assessed in Table 2. This will be reassessed and updated as necessary post consultation.

Table 2: Assessment of impact on protected characteristic groups of the proposed Clean Air Action Plan measures

	Action	Priority	Positive ✓ Negative ✗ Neutral impact on groups identified in section 2
1	Adopt the 'Planning and Air Quality for South Gloucestershire Council' Guidance	High	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
2	Update Local Plan Policy on Air Pollution	High	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
3	Review Parking SPD to Include Strong Policies to Encourage Active and Public Transport Use	High	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
4	Reduce Emissions from Non-Road Mobile Machinery (NRMM)	Medium	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic

	Action	Priority	Positive ✓ Negative ✗ Neutral impact on groups identified in section 2
5	Raise Awareness of the Need to Reallocate Road Space to Active and Public Transport Modes	High	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
6	Assess Air Pollution Impacts of Kingswood Masterplan and look to Maximise Air Pollution Improvement Potential of the Changes	High	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
7	Consider Air Pollution in the Development of Masterplans in South Gloucestershire	Medium	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
8	Develop a Council Wide Travel Plan	Low	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
9	Continue Bus Partnerships and Develop Enhanced Partnerships to Reduce Bus Emissions	High	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
10	Support Subregional Collaboration that Could Lead to Public Transport Concessions	High	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic ✓
11	Improvements to Lighting on Active Travel Infrastructure Between Bitton and Warmley	Low	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
12	Address Barriers to Active and Public Travel Through Communication Initiatives	High	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
13	Identify Locations Where Speed Limits Could be Reduced	Medium	All Groups Disability ✓ Age ✓ Pregnancy and Maternity Socio-economic

	Action	Priority	Positive ✓ Negative ✗ Neutral impact on groups identified in section 2
14	Develop Concept of and Implement Urban Lifestyle Areas	Medium/ High	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
15	Development of Mobility Hubs	Medium/ High	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
16	Adopt the latest standards for active travel Infrastructure	Medium	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
17	Increase the Number of Schools Accredited to Modeshift STARS Scheme	Medium	All Groups ☐ Disability ✓ Age ✓ Pregnancy and Maternity Socio-economic ✓
18	Actively Promote and Introduce School Streets at Suitable School Locations	Medium	All Groups Disability ✓ Age ✓ Pregnancy and Maternity Socio-economic ✓
19	Support Schools to Introduce Park and Stride Sites	Medium	All Groups Disability ✓ Age ✓ Pregnancy and Maternity Socio-economic ✓
20	Continue to Offer Cycle Training to Schools	Medium	All Groups Disability Age ✓ Pregnancy and Maternity Socio-economic ✓
21	Provide Resource to Plan and Install EV Charging Infrastructure	High	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic

	Action	Priority	Positive ✓ Negative ✗ Neutral impact on groups identified in section 2
22	Develop an Air Pollution Communication Plan	High	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
23	Raise Awareness of Air Pollution Impacts Amongst Health Professionals	High	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
24	Collect and Share Case Studies of Good Practice from Businesses That Have Worked to Reduce Pollution Emissions	High	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
25	Expand Smoke Control Area	Medium	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
26	Domestic Solid Fuel Awareness Raising Campaign	High	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
27	Lobby Govt to Review D7 Waste Exemptions: Burning Waste in the Open	High	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
28	Review and Update SGC Plans and Strategies to Reflect Latest Air Pollution Evidence and Public Health Impacts	High	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
29	Review of Taxi Licensing Conditions to Improve Emission Standards When Review Takes Place in 2022/23	High	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic
30	Implement Urban Design Practices to Reduce Exposure to Pollution	High	All Groups ✓ Disability Age Pregnancy and Maternity Socio-economic

SECTION 5 - EqIAA OUTCOME

This is an initial EqIAA and therefore, there is no outcome at this stage. All consultation feedback will be analysed and will be used to inform a full EqIAA post consultation.

Outcome	Response	Reason(s) and Justification
Outcome 1: No major change required.	<input type="checkbox"/>	
Outcome 2: Adjustments to remove barriers or to better promote equality have been identified.	<input type="checkbox"/>	
Outcome 3: Continue despite having identified potential for adverse impact or missed opportunities to promote equality.	<input type="checkbox"/>	
Outcome 4: Stop and rethink.	<input type="checkbox"/>	

SECTION 6 - EVIDENCE INFORMING THIS EqIAA

- South Gloucestershire Council. Air Quality Reports. Available from: <https://www.southglos.gov.uk/environment-and-planning/pollution/pollution-control-air-quality/air-quality-reports/>
- South Gloucestershire Council. 2012 Air Quality Action Plan. Available from: <https://www.southglos.gov.uk/documents/cos120094.pdf>
- South Gloucestershire Council. Joint Strategic Needs Assessment rolling programme - <https://www.southglos.gov.uk/community-and-living/stronger-communities/community-strategy/joint-strategic-needs-assessment-jsna/>
- House of Commons Environmental Audit Committee. Air Quality, Fifth Report of Session 2009-10. TSO: London.
- DEFRA. Clean Air Strategy 2019. Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf
- Wheeler B, Ben-Shlomo Y. Environmental equity, air quality, socioeconomic status and respiratory health. *Epidemiology and community health*. 2010; 59 (11).