

Equality Impact Assessment

Full assessment form 2018

www.portsmouthccg.nhs.uk

www.portsmouth.gov.uk

Directorate:

Regeneration

Service, function:

Transport Planning

Title of policy, service, function, project or strategy (new or old):

Portsmouth Air Quality Local Plan to set out how PCC will achieve compliance with legal limits for nitrogen dioxide in the shortest possible time.

Type of policy, service, function, project or strategy:

- Existing
- New / proposed
- Changed

Lead officer

Hayley Trower- Air Quality Lead for Transport

People involved with completing the EIA:

Lead Officer
Atkins as technical consultants undertaking the distributional analysis and economic impact studies which inform the Plan.

Introductory information (Optional)

In October 2018 PCC were issued with a ministerial direction requiring the Council to produce a plan detailing the measures that would be implemented to make improvements to levels of nitrogen dioxide (to below legal limits) within the shortest possible time. This plan is referred to as Portsmouth's Air Quality Local Plan and must be submitted to Government as an Outline Business Case by 31st October 2019.

The Plan establishes that in order to achieve compliance with legal limits for nitrogen dioxide in the shortest possible time a charging Clean Air Zone (CAZ) will need to be introduced in the city. The CAZ will be a Class B CAZ meaning that non-compliant buses, coaches, taxis and private hire vehicles will be issued with a daily charge for driving through or within the zone. Non-compliant vehicles are diesels older than Euro 6 and petrols older than Euro 4.

The CAZ will be supported by a number of non-charging measures including improvements to cycling infrastructure and a financial support package to allow businesses and individuals to access loans or grants to replace or retrofit their non-compliant vehicles.

Step 1 - Make sure you have clear aims and objectives

What is the aim of your policy, service, function, project or strategy?

Primary aim:

- To deliver a scheme that leads to compliance with NO₂ concentrations in the shortest possible time, without significantly worsening emissions elsewhere.

Secondary aim:

- Deliver value for money;
- Ensure that particular groups of stakeholders are not disproportionately impacted by any negative impacts associated with the proposed intervention;
- Complement existing and planned wider policies for the city (including promote economic growth, reduce levels of social deprivation, improve health and encourage sustainable and active travel);
- Be deliverable in terms of supply side capacity and capability;
- Be affordable; and
- Be achievable (taking into account technical, legislative, and political and public acceptability constraints).

Who is the policy, service, function, project or strategy going to benefit or have a detrimental effect on and how?

Portsmouth's Air Quality Local Plan will benefit all residents and visitors to the city through the reduction in concentrations of nitrogen dioxide which is harmful to human health.

The plan has potential to have a detrimental impact on local businesses that cannot afford to replace their non-compliant vehicles with non-compliant types. However, the mitigation measures being offered to businesses through the Clean Air Fund will help to address this issue by providing financial support for business to replace or retrofit their vehicles.

What outcomes do you want to achieve?

- Individuals/ businesses make more informed transport decisions, leading to:
- Individuals/ businesses choose to swap to less pollution vehicles or make fewer trips, leading to:
- Improved air quality for everyone in Portsmouth

What barriers are there to achieving these outcomes?

- Individuals/ businesses do not understand how they are contributing to poor air quality in the city and what they can do to address this;
- Individuals/ businesses cannot afford to replace/ retrofit their non-compliant vehicles.

Step 2 - Collecting your information

What existing information / data do you have? (Local or national data) look at population profiles, JSNA data, surveys and patient and customer public engagement activity locally that will inform your project, national studies and public engagement.

- An ANPR survey has been undertaken to understand the proportion of non-compliant vehicles within the local fleet
- A stated preference survey has been undertaken by individuals and businesses to understand plans for vehicle replacement, likely behavioral responses to different levels of CAZ charge, appetite for mitigation measures and support packages, accompanied by demographic questions
- Focus groups have been held with businesses and taxi/ PHV drivers to understand the impact that a charging CAZ could have on their businesses and what mitigation measures could be developed to reduce the detrimental effects

Using your existing data, what does it tell you?

- Although there are higher proportions of non-compliant vehicles within the local vehicle fleet than would be expected nationally, the number of non-compliant vehicles will reduce before the charging CAZ is implemented due to natural replacement of the fleet.
- The main impact will be on businesses rather than individuals due to the types of vehicles included in a Class B CAZ (buses, coaches, taxis, private hire vehicles and heavy goods vehicles).
- The public consultation and focus group work has shown that businesses are concerned about the cost of replacing vehicles in their fleets to compliant types and would welcome financial incentives to help them do this.
- Small- medium sized businesses and self employed (i.e taxi drivers) were most concerned about the financial implications of a charging CAZ.

Step 3 - Now you need to consult!

Who have you consulted with?

- Individual residents and visitors
- Local businesses
- National trade associations/ representative bodies
- Taxi/ PHV drivers and operators
- Bus and coach companies

If you haven't consulted yet please list who you are going to consult with

Please give examples of how you have or are going to consult with specific groups or communities e.g. meetings, surveys

- A public consultation (in the form of a survey) has already taken place, a further consultation of a similar format is planned to take place in early 2020.
- Focus groups with businesses have already taken place; additional sessions will be held to help develop the mitigation measures.
- Public exhibitions planned to allow individuals/ businesses to come and ask questions about the CCAZ.

Step 4 - What's the impact?

Is there an impact on some groups in the community? (think about race, gender, disability, age, gender reassignment, religion or belief, sexual orientation, sex, pregnancy and maternity, marriage or civil partnerships and other socially excluded communities or groups)

Generic information that covers all equality strands (Optional)

[Empty text box for generic information]

Ethnicity or race

- Potential for this group to be disproportionate impacted due to the high promotion of taxi/ PHV drivers from BME backgrounds. This can be addressed through the ongoing consultation/ engagement activities with taxi PHV drivers/ operators to help develop financial support packages that are accessible taking cultural considerations into account.

Gender reassignment

- No specific impact on this group.

Age

- Potential to disproportionately impact this group due to taxi/PHV drivers who are close to retirement and have non-compliant vehicles being unlikely to want to/ be able to afford to replace their vehicles. This can be explored through on-going engagement/ consultation with this group, considering options for financial support or sunset periods.

Disability

- Potential to impact on availability of wheelchair accessible taxis/PHVs. Explore this through consultation/ engagement considering financial support, sunset periods or exemptions.

- Also potential to impact availability of bus services if there are many non-compliant vehicles in the fleet the service may need to be reduced to mitigate the impact of the daily CAZ charges. This can be mitigated through funding retrofit of buses to ensure that they are compliant.

Religion or belief

- Potential to impact on this group due to types of financial support being offered. Must ensure that any financial support package can be accessed by all eligible persons and is not structured in a way that would exclude persons from applying because it is not acceptable within the confines of their religion or belief.

Sexual orientation

- No specific impact on this group.

Sex

- No specific impact on this group

Marriage or civil partnerships

- No specific impact on this group

Pregnancy & maternity

- No specific impact on this group

Other socially excluded groups or communities

- The CCAZ has potential to negatively impact those on low incomes or for small businesses due to the daily CAZ charge. However this impact can be mitigated through financial support to help the move to compliant vehicle types. However, the impact is limited due to the types of vehicles subject to a charge (only buses, coaches, taxis and PHVs).

Note: Other socially excluded groups, examples includes, Homeless, rough sleeper and unpaid carers. Many forms of exclusion are linked to financial disadvantage. How will this change affect people on low incomes, in financial crisis or living in areas of greater deprivation?

Health Impact

Have you referred to the Joint Needs Assessment (www.jsna.portsmouth.gov.uk) to identify any associated health and well-being needs?

Yes No

What are the health impacts, positive and / or negative? For example, is there a positive impact on enabling healthier lifestyles or promoting positive mental health? Could it prevent spread of infection or disease? Will it reduce any inequalities in health and well-being experienced by some localities, groups, ages etc? On the other hand, could it restrict opportunities for health and well-being?

- Positive impact on health as levels of nitrogen dioxide (and other harmful pollutants from road traffic emissions) will be reduced. This has potential to reduce hospital admissions from COPD, asthma and other respiratory and cardiopulmonary diseases.
- The improvement to cycling infrastructure as a non-charging measure will have the co-benefit to increasing physical activity which has positive impacts for wellbeing.
- Likely to reduce inequalities in exposure to air pollution as the areas of exceed that the Plan is focused on are located within one of the most deprived wards in the city. However, car ownership and car use is low in this ward therefore it is not the people living here (and being exposed to the pollution) that are the main contributors to the pollution.

Health inequalities are strongly associated with deprivation and income inequalities in the city. Have you referred to Portsmouth's Tackling Poverty Needs Assessment and strategy (available on the JSNA website above), which identifies those groups or geographical areas that are vulnerable to poverty? Does this have a disproportionately negative impact, on any of these groups and if so how? Are there any positive impacts?, if so what are they?

For more help on this element of tackling poverty and needs assessment contact Mark Sage: email:mark.sage@portsmouthcc.gov.uk

- Work is being undertaken to understand the distribution of businesses and individuals that are likely to be negatively impacted by the CAZ charges so that mitigation measures can be targeted at them.
- Potential positive impact for low income groups as there will be financial support available for replacement/ retrofit of vehicles; this funding would not be available without a CCAZ being introduced.

- It should be noted that the impact on individuals is limited to those dependent on non-compliant vehicles subject to a charge under a Class B CAZ (i.e not vans or private cars).

Step 5 - What are the differences?

Are any groups affected in a different way to others as a result of your policy, service, function, project or strategy?

Please summarise any potential impacts this will have on specific protected characteristics

- Groups affected are drivers of non-compliant buses, coaches, taxis, private hire vehicles and heavy goods vehicles, however belonging to this group is not mutually exclusive with any of the protected characteristics.

Does your policy, service, function, project or strategy either directly or indirectly discriminate?

Yes No

If you are either directly or indirectly discriminating, how are you going to change this or mitigate the negative impact?

- Indirect discrimination against certain ethnic/ religious groups that are disproportionately represented within the private hire trade. The impact will be mitigated by offering financial support packages that can be accessed by all persons eligible for support.
- Indirect discrimination against individuals with physical disabilities if wheelchair accessible taxis or buses see reduction in operation as a result of CAZ charges. Can be mitigated against by offering financial support for replacement/ retrofit of non-compliant wheelchair accessible vehicles, exemptions or sunset periods.
- Indirect discrimination against those on low incomes as they will not be able to afford to replace/retrofit their non-compliant vehicles and so will have to pay the CAZ charge. Can be mitigated against by offering interest free loans and grants to all with eligible vehicles.

Step 6 - Make a recommendation based on steps 2 - 5

If you are in a position to make a recommendation to change or introduce the policy, service, project or strategy clearly show how it was decided on and how any engagement shapes your recommendations.

- The proposed charging CAZ should be introduced as this will have the benefit of improving air quality in the city which will have a positive impact on the health of individuals. However, further consultation and engagement should be undertaken to understand the best types of financial and practical support that can be offered to individuals (particularly those in groups that are indirectly discriminated against) and businesses to help them to switch to compliant vehicle types.

What changes or benefits have been highlighted as a result of your consultation?

- The option to access grants or interest free loans should be offered, not one or the other.

If you are not in a position to go ahead what actions are you going to take?
(Please complete the fields below)

| Action | Timescale | Responsible officer |
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How are you going to review the policy, service, project or strategy, how often and who will be responsible?

- The work will continue to be developed as we move from Outline Business Case to Full Business Case. This will be overseen by Government's Joint Air Quality Unit (JAQU) and an independent Technical Review Panel. Regular updates will be provided to JAQU and a highlight report will be taken to the monthly Air Quality Board. This reporting and review will be the responsibility of the Air Quality Lead for Transport.

Step 7 - Now just publish your results

This EIA has been approved by:

Contact number:

Date:

PCC staff-Please email a copy of your completed EIA to the Equality and diversity team. We will contact you with any comments or queries about your preliminary EIA.
Telephone: 023 9283 4789, Email: equalities@portsmouthcc.gov.uk

CCG staff-Please email a copy of your completed EIA to the Equality lead who will contact you with any comments or queries about your full EIA. Email: sehccg.equalityanddiversity@nhs.net