

Greater Manchester's Clean Air Plan to Tackle Nitrogen Dioxide Exceedances at the Roadside

Appendix 2 - GM CAP EQIA following consultation - Evidence report - Rochdale assessment



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1 Local Authority EqIA Appendix - Rochdale

1.1 Introduction

An Equality Impact Assessment (EqIA) has been developed at a Greater Manchester (GM) scale for the GM Clean Air Plan (GM CAP) in line with the public sector equality duty in section 149 of the Equality Act, 2010.

The GM wide assessment builds on EqIAs that were published at the Outline Business Case stage in 2019 and the EqIA developed to support the consultation in late 2020. It considers the impacts on protected characteristics related to the implementation of CAZ C charging zone in GM and how implementation of the proposed package of mitigation measures addresses any identified equality impacts. This EqIA is an update following changes to the GM CAP policy made in consideration of feedback received during the consultation.

The EqIA is supported by an Equality Impact Evidence Report, appended to the EqIA¹.

1.1 Local Authority Assessment

This appendix to the GM EqIA includes an assessment of equality carried out by Rochdale Council. The reasons for individual LA assessments include:

- To fulfil legal requirements placed on LAs to meet their duty under the Equality Act;
- To ensure that each of the LAs has considered and understood the full GM EqIA report and the context for the LA itself;
- To identify any LA baseline profile nuances or differences to that presented in the GM EqIA (Appendix A in the Equality Impact Evidence report).
- To review the assessment outcomes of the GM EqIA and identify whether impacts would be more or less significant within the LA areas;
- To highlight any geographical 'hot spots' with LA areas;
- To identify any actions LAs could take to mitigate and monitor equality impacts identified (specific to the LA area rather than applicable across GM as a whole).

¹ <https://cleanairgm.com/technical-documents/>

1.2 Local approach to Equality Impact

Rochdale Council developed a standard approach to assessing Equality Impact to meet the requirements of the Public Sector Equality Duty, consisting of an initial assessment, full assessment and an impact action plan. This is to ensure the authority has an understanding of our diverse communities and take account of their needs when designing policies and delivering services.

In addition to the 9 Protected Characteristics identified in the Equality Act 2010, Rochdale Council has added 2 extra categories to our Equality Impact Assessments:

- Carers
- Serving or ex serving members of the armed forces

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2 Rochdale Council EqIA Appendix

2.1 Baseline data review

2.1.1 Introduction

This section describes the process Rochdale Council has applied to establish the baseline data for this Equality Impact Assessment.

It aligns to the process established for the GM CAP full EqIA to establish evidence about the protected characteristics of equality groups using the following sources:

- ONS, 2011 Census
- ONS 2018 and 2019 population projections
- Working and Pensions Longitudinal Study, 2016
- Policy review of local strategies
- Department for Transport, 2016
- These sources have been supplemented by local data, wherever possible. However, where there are gaps, every effort has been made to ensure impacts are considered using relevant anecdotal evidence from professionals in the service areas.

2.1.2 Baseline data updates

In- Scope Protected Characteristic	Overview for the local authority; including updated data.	'Outliers' within the Local Authority (LSOAs or communities with a particularly high proportion of a protected characteristic to highlight any distributional impacts)
Age	<p>ONS 2018 Mid-Year Population Estimates illustrate the age profile for the borough. Rochdale has:</p> <ul style="list-style-type: none"> • a slightly higher proportion of young people aged 0-16 years (21.6%) than the GM average (20.5%) • a slightly lower proportion of the 16-64 working age population at 62.1%, compared to the GM average of 63.7% • a slightly higher proportion of older residents than the GM average, with 16.3% of people aged 65+, compared to 15.8% in GM 	<p>More recent data from the ONS Mid-Year Population Estimates 2019 illustrates that there are a number of outliers, in respect of age, for Rochdale borough.</p> <p>A number of wards have a particularly high proportion of 0-16 year olds:</p> <ul style="list-style-type: none"> • Balderstone and Kirkholt (25%) • Central Rochdale (26%) • Kingsway (27%) • Milkstone and Deepdish (26%) • Smallbridge and Firgrove (26%) • Spotland and Falinge (24%) • West Middleton (24%) <p>A number of wards have a particularly high proportion of residents aged 65+:</p> <ul style="list-style-type: none"> • Bamford (24%)

In- Scope Protected Characteristic	Overview for the local authority; including updated data.	'Outliers' within the Local Authority (LSOAs or communities with a particularly high proportion of a protected characteristic to highlight any distributional impacts)
	<p>Rochdale has lower life expectancy at birth, and at age 65, than the GM average:</p> <ul style="list-style-type: none"> Life expectancy at birth for males in Rochdale is 77.2years compared to 77.8 for GM Life expectancy at birth for females in Rochdale is 80.6years compared to 81.3 for GM 	<ul style="list-style-type: none"> Littleborough and Lakeside (23%) South Middleton (22%) Norden (21%) Milnrow and Newhey (21%) Castleton (20%) Healey (19%) Wardle and West Littleborough (18%) Hopwood Hall (18%)
Disability	<p><u>Deprivation</u> The 2019 Index of Multiple Deprivation (IMD) for Health Deprivation and Disability, ranked Rochdale at position 14 (from a total of 151 upper tier local authorities in England). A lower score indicates more deprivation. Rochdale has the fourth lowest IMD rank of the ten GM local authorities. The borough is more deprived relative to GM averages.</p> <p><u>Limiting conditions</u> The 2011 Census collected self-reported data on the percentage of people whose day to day activities are limited as a result of disability. 9.8% of the resident population in GM (all ages) are limited a lot by a disability. This figure is slightly higher for Rochdale (all ages) at 10.7%.</p> <p>The 45-69 age group reports the greatest proportion of disability at both a GM level and borough level. However, again, the rate is slightly higher for Rochdale (4.64%) than the GM average (4.09%).</p> <p><u>Disability Benefit Claimants</u> The 2018 ONS states the average proportion of benefit claimants across GM is 3.12%. Rochdale has the highest proportion of benefit claimants of all the 10 GM boroughs at 3.66% (8,050 people).</p>	<p><u>Deprivation</u> Rochdale has 134 LSOAs. The IMD 2019 shows that of these, 43 LSOAs (32%) are ranked as the most deprived in relation to health and disability (i.e. they have the lowest ranking of 1). These are spread throughout Rochdale. 16 of the borough's 20 wards have at least one LSOA ranked as the most deprived for health and disability.</p> <p><u>Limiting conditions</u> A more detailed assessment of data (from the same source) shows that 14 of the 20 wards in Rochdale have a higher percentage of people reporting that their day to day activities are limited as a result of disability than the GM average. These are spread across the borough:</p> <ul style="list-style-type: none"> West Middleton (14.3%) Smallbridge and Firgrove (13.2%) North Heywood (12.3%) West Heywood (12.1%) Balderstone and Kirkholt (11.8%) Central Rochdale (11.6%) Castleton (11.6%) Milkstone and Deeplish (11.5%) East Middleton (11.1%) Spotland and Falinge (11.0%) Kingsway (10.7%) Hopwood Hall (10.4%) North Middleton (10.2%) South Middleton (10.1%)

In- Scope Protected Characteristic	Overview for the local authority; including updated data.	'Outliers' within the Local Authority (LSOAs or communities with a particularly high proportion of a protected characteristic to highlight any distributional impacts)
	<p>The 2018 ONS data is the most recent source of information for disability benefit claimants – Rochdale Council does not have more up to date or detailed information.</p> <p>Blue Badge Holders Department for Transport data (2017-18) shows that, compared to the 10 boroughs of GM, Rochdale has the joint second highest proportion of the population with blue badges at 1.8% (only Wigan Council has a higher percentage). This equates to 4,033 people. It indicates that Rochdale has a higher proportion of disabled people than most other GM boroughs.</p> <p>Information on blue badge holders is not available at ward level. However, more recent data from the Department for Transport shows the number of valid Blue Badges held by individuals in Rochdale increased to 5,156 in 2019.</p>	
Pregnancy and Maternity	<p>Data on live births is commonly used as a proxy for pregnancy and maternity.</p> <p>ONS 2019 data shows that in 2018, 2.46% of the female GM population had a live birth. The rate was higher in Rochdale at 2.54%.</p>	<p>More recent ONS data for 2020 shows Rochdale is comparable to the GM average, with 2.4% of the female population having a live birth (equating to a count of 2,702).</p> <p>The following 5 wards had the highest level of live births:</p> <ul style="list-style-type: none"> • Milkstone and Deeplish (201) • West Middleton (195) • Kingsway (190) • Central Rochdale (185) • Smallbridge and Firgrove (173)
Race	<p>The 2011 ONS Census data provides a breakdown of ethnicity and shows: -</p>	<p>ONS Mid-Year Population Estimates for 2019 demonstrate that Rochdale has a large number of wards with a high proportion of BAME residents:</p> <ul style="list-style-type: none"> • Milkstone and Deeplish (75.6%)

In- Scope Protected Characteristic	Overview for the local authority; including updated data.	'Outliers' within the Local Authority (LSOAs or communities with a particularly high proportion of a protected characteristic to highlight any distributional impacts)
	<ul style="list-style-type: none"> 83.7% of the GM population is white. The proportion is lower in Rochdale at 81.6% 18.4% of the Rochdale population is from a BAME background compared to 16.3% across GM. Rochdale has the third most diverse population in GM – behind only Manchester and Oldham. <p>More recent data from the 2019 Annual Population survey shows Rochdale now has 25.8% BAME residents.</p>	<ul style="list-style-type: none"> Central Rochdale (61.1%) Kingsway (38.7%) Spotland and Falinge (29.2%) Smallbridge and Firgrove (26.1%) Bamford (20.2%)
Sex	<p>Rochdale aligns to the GM picture with a slightly higher proportion of the population being female than male, as follows:</p> <ul style="list-style-type: none"> 49.36% of the population are male (compared to 49.68% in GM) 50.64% of the population are female (compared to 50.32% in GM) 	<p>There are no outliers in respect of this protected characteristic - all wards in Rochdale have a slightly higher proportion of females than males.</p>
Religion / Belief	<p>The two major religions in Rochdale are Christianity and Islam. The ONS Census 2011 shows</p> <ul style="list-style-type: none"> 61.8 of the GM population is Christian compared to 60.6% in Rochdale 8.7% of the GM population is Muslim compared to 13.9% in Rochdale 	<p>The latest data on religion is from the 2011 census. The local authority does not have additional, or more recent, data sources.</p>
Gender reassignment/ Gender identity/ transgender	<p>Unfortunately no data sets are available to allow the identification of the proportion of trans people in the population.</p>	<p>Rochdale Council does not have any data which suggests that this protected characteristic group would experience a positive or negative impact as a result of the introduction of the GM Clean Air Zone. Therefore, until there is some evidence, we assume there will be a neutral impact.</p>
Sexual orientation	<p>Rochdale Council includes sexual orientation in all Equality Impact Assessments in order</p>	<p>Data is not available on the distribution of individuals by sexual orientation within Rochdale.</p>

In- Scope Protected Characteristic	Overview for the local authority; including updated data.	'Outliers' within the Local Authority (LSOAs or communities with a particularly high proportion of a protected characteristic to highlight any distributional impacts)
	<p>to determine if there may be a disproportionate impact due to a policy / service change on this protected characteristic than the general population.</p> <p>Statistics relating to sexual orientation were not collected in the 2011 census and the data that has been obtained by the ONS has been obtained on large regional scales. Therefore there is a lack of local data.</p> <p>The 2017 ONS population survey found that</p> <ul style="list-style-type: none"> • 2% of the UK population identifies as lesbian, gay or bisexual • 2.2% of the North West population identify as lesbian, gay or bisexual • A higher proportion of men (1.7%) than women (0.9%) identify as gay or lesbian, whilst a higher proportion of women (0.9%) identify as bisexual than men (0.6%) • Younger people are more likely to identify as lesbian, gay or bisexual than any other age group with 4.2% of 16-24 year olds identifying as LGB in 2017 in the UK <p>Data on sexual orientation is not available at a local level, but it is assumed that the profile for sexual orientation determined by the ONS population survey 2017 is likely to be replicated in Rochdale.</p>	

In line with Rochdale Council's approach to carrying out Equality Impact Assessments, the following characteristics have also been assessed (these were either screened out in the overall GM CAP EqIA as not impacted, or are additional to the protected characteristics defined within the Equality Act).

Protected Characteristic	Overview for the local authority; including updated data.	'Outliers' within the Local Authority (LSOAs or communities with a particularly high proportion of a protected characteristic to highlight any distributional impacts)
<p>Marriage & civil partnership</p>	<p>Rochdale Council includes marriage and civil partnership in all Equality Impact Assessments in order to determine if there may be a disproportionate impact of a policy / service change on this protected characteristic than the general population.</p> <p>Compared to the GM average, Rochdale has:</p> <ul style="list-style-type: none"> • A slightly lower proportion of single people at 35.1% (the GM average is 38.4%) • A slightly higher proportion of married people at 44.2% (the GM average is 42.6%) 	<p>None</p>
<p>Carers</p>	<p>Rochdale Council includes carers in all Equality Impact Assessments in order to determine if there may be a disproportionate impact of a policy / service change on this protected characteristic than the general population.</p> <p>Caring can have a significant impact on health.</p> <ul style="list-style-type: none"> • 72% of carers responding to Carers UK's State of Caring 2018 Survey said they had suffered mental ill health as a result of caring duties. • In the same survey, 61% said they had suffered physical ill health as a result of caring duties. <p>Carers UK estimate that there are 6.5million carers in the UK and that, of these, 1.3million provide over 50 hours of care per week.</p> <p>According to the census in 2011:</p>	<p>The 2011 census illustrates that some wards have a significantly higher proportion of people (than the borough average) providing 50 hours or more of care per week:</p> <ul style="list-style-type: none"> • West Middleton (3.8%) • West Heywood (3.4%) • Smallbridge and Firgrove (3.3%) • Balderstone and Kirkholt (3.3%) • Castleton (3.3%) • East Middleton (3.2%) • Milkstone and Deeplish (3.1%) • South Middleton (3.0%)

Protected Characteristic	Overview for the local authority; including updated data.	'Outliers' within the Local Authority (LSOAs or communities with a particularly high proportion of a protected characteristic to highlight any distributional impacts)
	<ul style="list-style-type: none"> • There were 23,260 carers resident in Rochdale borough who provide unpaid care, helping family, friends or neighbours with long-term physical or mental ill-health or disability or problems relating to old age. • 2.9% of the Rochdale population (6,105 people) provide 50 or more hours of care per week. This is above regional and national comparators. As there are now a greater number of older people than there were in 2011 the current number of carers is likely to be higher. 	
Military Veterans	<p>Rochdale Council includes military veterans in all Equality Impact Assessments in order to determine if there may be a disproportionate impact of a policy / service change on this protected characteristic than the general population</p> <p>Rochdale Council added this cohort to the list of those with protected characteristics following signing the Armed Forces Covenant. The aim is to ensure that that no member of the Armed Forces (serving or Veteran) or their families should be disadvantaged as a result of service.</p> <p>There are around 14,623 armed forces veterans in Rochdale representing approximately 8.7% of the over 16 population. This is around the Greater Manchester average (source: Rochdale JSNA).</p> <p>We know that ex-armed forces are at increased risk of developing certain</p>	<p>Information is not available to identify which wards or LSOAs military veterans live in. This will improve following the publication of 2021 census data, as questions have been added on veteran status for the first time.</p>

Protected Characteristic	Overview for the local authority; including updated data.	'Outliers' within the Local Authority (LSOAs or communities with a particularly high proportion of a protected characteristic to highlight any distributional impacts)
	physical or mental conditions in later life. The susceptibility to these risks will vary depending on their service history as well as other factors such as age and living environment.	

2.1.3 Socio-Economic Characteristics

Under the Equality Act, socio-economic characteristic is not a Protected Characteristic. As a result, the GM EqIA for CAP does not consider the impacts on the scheme on difference socio-economic groups. A Distributional Impact Assessment (DIA) has been undertaken for the programme which does consider these impacts.

Rochdale Council does not usually include socio-economic circumstances as a Protected Characteristic in equality impact assessments. However, it is anticipated that the main negative impact of the GM Clean Air Zone will be financial. As Rochdale borough has high levels of deprivation and low income, it is considered necessary to include socio-economic impacts in this EqIA.

Deprivation

The Index of Multiple Deprivation (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation. These include: employment, education, skills and training, health and disability, crime, barriers to housing service, and living environment. Rochdale is one of the most deprived borough's in the country and appears in the 25 most deprived districts (out of 326) for each of the five district level deprivation measures. We can describe this by saying the borough is now ranked between 15th and 25th most deprived in England.

In relation to trajectory, if we compare the 2019 Indices of Multiple Deprivation (IMD) to the 2015 data, it shows that Rochdale became relatively more deprived in three of the five district level summary measures in 2019 compared to 2015.

Domains of Deprivation	IMD 2015 Rank	IMD 2019 Rank	Change
Income	29	22	-7
Employment	16	14	-2
Education, Skills & Training	51	48	-3
Health & Disability	15	18	+3
Crime	27	2	-25
Barriers to Housing & Services	176	225	+49

Domains of Deprivation	IMD 2015 Rank	IMD 2019 Rank	Change
Living Environment	141	145	+4

In relation to Greater Manchester, the IMD for 2019 showed that 30% (n=40) of Rochdale's LSOAs are in the top 10% most deprived in the UK; compared to 23.3% of all LSOAs across Greater Manchester.

Benefit claimants

NOMIS Official Labour Market Statistics for April 2021 reveal that 8% of GM residents (aged 16-64) are claiming benefits for unemployment. The claimant rate for Rochdale is higher at 8.8%. This represents the third highest claimant rate in GM (with only Oldham and Manchester having higher numbers at 10% and 9.3% respectively).

There are certain wards within Rochdale where the claimant rate is particularly high:

- Milkstone and Deeplish 13.7%
- Central Rochdale 13.6%
- Kingsway 12.2%
- Smallbridge and Firgrove 11.6%
- West Middleton 10.8%
- Balderstone and Kirkholt 9.8%
- Spotland and Falinge 9.5%
- North Middleton 9.3%
- North Heywood 9.0%

2.2 Equality impacts review

The table below provides a summary of equality impacts identified for GM against each of the protected characteristics and each of the assessment topics (i.e. air quality, accessibility, and affordability) and identifies whether the assessment differs within Rochdale. Where there are differences, an explanation is provided.

Protected characteristic	Assessment topic	Impact (+/-)	GM Magnitude of impact post mitigation (extent of population exposure to impact)	Rochdale Council Magnitude of impact post mitigation (extent of population exposure to impact)	Differential/ Disproportionate	Justification for assessment outcome/ Reason for difference in impact from GM assessment
Age	Air quality	+	High	High	Differential	Rochdale has a slightly higher ratio of older (65+) and younger (0-16 years) residents than the GM average. Therefore the proportion of people benefiting from improved air quality will be slightly higher in Rochdale compared to GM.
	Accessibility	-	Low/ Medium	Medium	Disproportionate	Rochdale has a slightly higher ratio of older (65+) and younger (0-16 years) residents than the GM average. Therefore the proportion of people that may be adversely affected by accessibility of public transport, PHV or Hackney vehicles will be slightly higher in Rochdale compared to GM.
	Affordability	-	Medium	Medium	Disproportionate	Rochdale has a slightly higher ratio of older (65+) and younger (0-16 years) residents than the GM average. Therefore the proportion of people that may be adversely affected by the affordability of public transport, PHV or Hackney vehicles will be slightly higher in Rochdale compared to GM.
Negative Impact						

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Protected characteristic	Assessment topic	Impact (+/-)	GM Magnitude of impact post mitigation (extent of population exposure to impact)	Rochdale Council Magnitude of impact post mitigation (extent of population exposure to impact)	Differential/ Disproportionate	Justification for assessment outcome/ Reason for difference in impact from GM assessment
						<p>We know that bus use is highest amongst both younger and older people. If bus companies respond to the impact of the GM CAZ charges by either increasing fares or reducing the frequency of services, this may affect accessibility and affordability for these individuals.</p> <p>Mitigations</p> <p>However, it is anticipated that the Clean Bus Fund will mitigate the impact of increased costs for the bus companies and therefore reduce the potential for these businesses to make any changes which would have an adverse impact on this protected characteristic group.</p> <p>Positive Impact</p> <p>In addition, both younger and older age groups have been shown to be particularly vulnerable to poor air quality and will benefit from reduced pollution.</p>
Disability ²	Air quality	+	High	High	Differential	<p>Rochdale has significantly higher ratios of blue badge holders, disability benefit claimants, and people self-reporting that they have a disability than the GM average.</p> <p>Relative to the GM boroughs, Rochdale is:</p> <ul style="list-style-type: none"> - Highest for disability benefit claimants - Joint second highest for blue badge holders <p>Therefore, a higher proportion of Rochdale residents will benefit from the improvement in air quality.</p>

² Disability covers a wide range of physical and mental impairment. Where the impact would differ dependent on disability this is flagged in the narrative.

Protected characteristic	Assessment topic	Impact (+/-)	GM Magnitude of impact post mitigation (extent of population exposure to impact)	Rochdale Council Magnitude of impact post mitigation (extent of population exposure to impact)	Differential/ Disproportionate	Justification for assessment outcome/ Reason for difference in impact from GM assessment
	Accessibility	-	Low / medium	High	Disproportionate	<p>Rochdale has significantly higher ratios of blue badge holders, disability benefit claimants, and people self-reporting that they have a disability than the GM average.</p> <p>Relative to the GM boroughs, Rochdale is:</p> <ul style="list-style-type: none"> - Highest for disability benefit claimants - Joint second highest for blue badge holders <p>Therefore the accessibility of public transport, PHV or Hackney vehicles will be significantly higher in Rochdale compared to GM.</p>
	Affordability	-	Medium	High	Disproportionate	<p>Rochdale has higher ratios of blue badge holders, disability benefit claimants, and people self-reporting that they have a disability than the GM average.</p> <p>Relative to the GM boroughs, Rochdale is:</p> <ul style="list-style-type: none"> - Highest for disability benefit claimants - Joint second highest for blue badge holders <p>Therefore the proportion of people that may be adversely affected by changes to the affordability of public transport, PHV or Hackney vehicles will be higher in Rochdale compared to GM.</p>

Protected characteristic	Assessment topic	Impact (+/-)	GM Magnitude of impact post mitigation (extent of population exposure to impact)	Rochdale Council Magnitude of impact post mitigation (extent of population exposure to impact)	Differential/ Disproportionate	Justification for assessment outcome/ Reason for difference in impact from GM assessment
	<p>Negative Impact</p> <p>People with disabilities are more reliant on public transport, taxi and PHVs because they are more likely to not drive. They are also more likely to use community transport. Changes in provision could have an adverse impact on this group in terms of affordability and accessibility to services, work and social activities.</p> <p>The data for Rochdale shows we have a high proportion of disabled people dispersed throughout the borough. Disabled people may suffer from reduced choice, accessibility and frequency of compliant modes of transport due to the implementation of the GM Clean Air Zone.</p> <p>Mitigations</p> <p>To mitigate the potential negative impact on this protected characteristic group the following permanent exemptions (from charging) have been applied to the GM Clean Air Zone :</p> <ul style="list-style-type: none"> • Community minibuses • Disabled passenger vehicles • Disabled tax class vehicles <p>Following feedback from the public consultation:</p> <ul style="list-style-type: none"> • Additional permanent exemptions have been included for other LGVs and minibuses which have been specially adapted for use by a disabled user (which do not qualify for the disabled exemptions). • The temporary exemptions for GM-licensed Wheelchair Accessible Taxi and PHVs have been extended from December 2022 to May 2023. 					

Protected characteristic	Assessment topic	Impact (+/-)	GM Magnitude of impact post mitigation (extent of population exposure to impact)	Rochdale Council Magnitude of impact post mitigation (extent of population exposure to impact)	Differential/ Disproportionate	Justification for assessment outcome/ Reason for difference in impact from GM assessment
	<p>The Clean Taxi Fund and Vehicle Finance Scheme are designed to mitigate the negative impact on of the GM CAZ charges on Hackney and PHV drivers/ companies.</p> <p>Positive Impact</p> <p>Some disabled people will have chronic conditions which can be adversely impacted by air pollution. Improvements in air quality are likely to benefit this protected characteristic group.</p> <p>In addition, CAZ Category C will not include private cars, so disabled people who use their own private cars will not be affected by the CAZ charges - only the positives of improved air quality.</p>					
Pregnancy and maternity	Air quality	+	High	High	Differential	Rochdale is comparable to the GM average for live births (the proxy for pregnancy and maternity). We would anticipate the benefits of improved air quality for this protected characteristic will be broadly similar at both a GM and Rochdale level.
	Accessibility	-	No impact	Low	Disproportionate	It is possible that some people may experience problems in accessing medical appointments, toddler groups or other support networks for parents, if bus companies respond to the impact of the GM CAZ charges by either increasing fares or reducing the frequency of services, therefore impacting upon accessibility and affordability for these individuals.

Protected characteristic	Assessment topic	Impact (+/-)	GM Magnitude of impact post mitigation (extent of population exposure to impact)	Rochdale Council Magnitude of impact post mitigation (extent of population exposure to impact)	Differential/ Disproportionate	Justification for assessment outcome/ Reason for difference in impact from GM assessment
	Affordability	-	No impact	Low	Disproportionate	It is possible that some people may experience problems in accessing medical appointments, toddler groups or other support networks for parents, if bus companies respond to the impact of the GM CAZ charges by either increasing fares or reducing the frequency of services, therefore impacting upon accessibility and affordability for these individuals.
	<p>Negative Impact</p> <p>It is possible that some people may experience problems in accessing medical appointments, toddler groups or other support networks for parents, if bus companies respond to the impact of the GM CAZ charges by either increasing fares or reducing the frequency of services, therefore impacting upon accessibility and affordability for these individuals.</p> <p>Mitigations</p> <p>It is anticipated that the Clean Bus Fund will mitigate the impact of increased costs for the bus companies and therefore reduce the potential for these businesses to make any changes which would have an adverse impact on this protected characteristic group.</p> <p>Positive Impact</p> <p>Pregnant women have been shown to be particularly vulnerable to poor air quality and will benefit from reduced pollution.</p>					

Protected characteristic	Assessment topic	Impact (+/-)	GM Magnitude of impact post mitigation (extent of population exposure to impact)	Rochdale Council Magnitude of impact post mitigation (extent of population exposure to impact)	Differential/ Disproportionate	Justification for assessment outcome/ Reason for difference in impact from GM assessment
Race ³	Air quality	+	High	High	Disproportionate	Rochdale has the third highest BAME population of all the GM boroughs –only Manchester and Oldham have more diverse communities. Therefore, a higher proportion of Rochdale residents will benefit from the improvement in air quality.
	Accessibility	-	High / Medium	High	Disproportionate	Rochdale has the third highest BAME population of all the GM boroughs –only Manchester and Oldham have more diverse communities. Therefore the proportion of people that may be adversely affected by changes to the accessibility of public transport, PHV or Hackney vehicles will be higher in Rochdale compared to GM.
	Affordability	-	High /Medium	High	Disproportionate	Rochdale has the third highest BAME population of all the GM boroughs –only Manchester and Oldham have more diverse communities. Therefore, the proportion of people that may be adversely affected by changes to the affordability of using public transport, PHV or Hackney vehicles (as passengers) will be higher in Rochdale compared to GM.

³ Race covers all races identified within the ONS dataset. Where the impact would differ for different races, this is identified in the narrative.

Protected characteristic	Assessment topic	Impact (+/-)	GM Magnitude of impact post mitigation (extent of population exposure to impact)	Rochdale Council Magnitude of impact post mitigation (extent of population exposure to impact)	Differential/ Disproportionate	Justification for assessment outcome/ Reason for difference in impact from GM assessment								
						Rochdale also has the third largest Hackney and PHV fleet in GM. The majority of drivers are from BAME, particularly Asian, backgrounds. Therefore, increases in business costs will have a disproportionately high impact on this group in Rochdale, compared to other GM boroughs and the GM average.								
<p>Commentary</p> <p>Anecdotally, the council is aware that the majority of taxi and private hire companies are from the Asian community and that the overwhelming majority of our drivers are male. Therefore, the GM CAZ charges will have a disproportionate impact on this protected characteristic group.</p> <p>Rochdale has a fleet of 1270 registered vehicles (the third largest in GM). A breakdown of the vehicle type, ownership and non-compliance with GM CAP emissions is provided below:</p> <table border="1" data-bbox="409 1123 1825 1283"> <thead> <tr> <th data-bbox="409 1123 752 1217">Type of Licensed Vehicle</th> <th data-bbox="752 1123 1205 1217">Total No. of Vehicles currently licensed</th> <th data-bbox="1205 1123 1583 1217">Non-Compliant with GM CAP Emission Standards (number)</th> <th data-bbox="1583 1123 1825 1217">Non-Compliant (%)</th> </tr> </thead> <tbody> <tr> <td data-bbox="409 1217 752 1283">Hackney Carriage Vehicle (Taxi)</td> <td data-bbox="752 1217 1205 1283">105</td> <td data-bbox="1205 1217 1583 1283">59</td> <td data-bbox="1583 1217 1825 1283">56%</td> </tr> </tbody> </table>							Type of Licensed Vehicle	Total No. of Vehicles currently licensed	Non-Compliant with GM CAP Emission Standards (number)	Non-Compliant (%)	Hackney Carriage Vehicle (Taxi)	105	59	56%
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	Private Hire Vehicles (PHV)		1165 Of these: • 230 (18%) are owned by 33 taxi firms • 1040 (82%) are individually owned		611	52%														
	Total		1270		670	53%														
	The age profile of licensed drivers is illustrated in the table below:																			
	<table border="1"> <thead> <tr> <th data-bbox="409 991 734 1059">Age</th> <th data-bbox="734 991 1057 1059">Number of drivers</th> </tr> </thead> <tbody> <tr> <td>21-29</td> <td>58</td> </tr> <tr> <td>30-39</td> <td>406</td> </tr> <tr> <td>40-49</td> <td>602</td> </tr> <tr> <td>50-59</td> <td>410</td> </tr> <tr> <td>60+</td> <td>217</td> </tr> <tr> <td>Total</td> <td>1693</td> </tr> </tbody> </table>						Age	Number of drivers	21-29	58	30-39	406	40-49	602	50-59	410	60+	217	Total	1693
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						<p>The table below shows the location that licensed drivers live:</p> <table border="1" data-bbox="409 679 1034 863"> <thead> <tr> <th>Location</th> <th>Number</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Rochdale</td> <td>1312</td> <td>77.5</td> </tr> <tr> <td>Heywood</td> <td>31</td> <td>1.8</td> </tr> <tr> <td>Middleton</td> <td>41</td> <td>2.4</td> </tr> <tr> <td>Out of borough</td> <td>309</td> <td>18.3</td> </tr> </tbody> </table> <p>The data shows the majority of drivers are middle aged and live in Rochdale. Just over half will be negatively impacted by the implementation of the GM Clean Air Zone as they currently drive non-compliant vehicles.</p> <p>Negative As evidenced above, a high proportion of PHV and Hackney drivers from Rochdale are from BAME, and particularly Asian, backgrounds. Any increases in business operating costs due the GM CAZ charges will disproportionately affect this protected characteristic group.</p> <p>Mitigations A range of initiatives have been included in the GM Clean Air Zone plan to mitigate potential negative impacts, including:</p> <ol style="list-style-type: none"> 1. Permanent discounts PHVs (owned or exclusively contracted by 1 person) licensed to one of the 10 GM local authorities and also used as a private car to be eligible to apply for a discounted charge of 5/7 of the weekly total 	Location	Number	%	Rochdale	1312	77.5	Heywood	31	1.8	Middleton	41	2.4	Out of borough	309	18.3
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						<p>2. Clean Taxi Fund Grants will be available to support the replacement of compliant vehicles</p> <p>3. Vehicle Finance A loan scheme will be made available to support firms to replace or retrofit affected vehicles. GMCA have informed local authorities the loan scheme will be culturally compliant</p> <p>In response to feedback from the public consultation the following additional mitigations will also be implemented:</p> <ol style="list-style-type: none"> 1. Temporary exemptions for GM licensed Hackney and PHV drivers have been extended to May 2023 2. Retrofit grants will now be available for PHV drivers as well as Hackney drivers <p>Positive People from BAME backgrounds are more likely to live in areas where air quality is currently poorest. They will therefore benefit from improvements in reduced pollution.</p>
Sex	Air quality			No equality impact		Rochdale Council does not have any data which suggests that this protected characteristic would experience a negative impact as a result of the introduction of the GM Clean Air Zone. Therefore, we assume there will be a neutral impact.

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	Accessibility	No equality impact			Rochdale Council does not have any data which suggests that this protected characteristic would experience a negative impact as a result of the introduction of the GM Clean Air Zone. Therefore, we assume there will be a neutral impact	
	Affordability	-	High/ Medium	High	Disproportionate	<p>The GM EqIA identifies that taxi drivers, PHV drivers and bus drivers are over 90% more likely to be male than female. Any business costs are therefore likely to be disproportionately experienced by men.</p> <p>Rochdale has the third largest taxi fleet in GM – therefore it is more likely that this will have a disproportionate impact in Rochdale than other boroughs in GM.</p>
	<p><u>Negative</u></p> <p>Anecdotally, the council is aware that the majority of taxi and private hire drivers are male. Any increases in business operating costs due the GM CAZ charges will disproportionately affect men.</p> <p><u>Mitigations</u></p>					

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						<p>A range of initiatives have been included in the GM Clean Air Zone plan to mitigate potential negative impacts, including:</p> <ol style="list-style-type: none"> 1. Permanent discounts PHVs (owned or exclusively contracted by 1 person) licensed to one of the 10 GM local authorities and also used as a private car to be eligible to apply for a discounted charge of 5/7 of the weekly total 2. Clean Taxi Fund Grants will be available to support the replacement of compliant vehicles 3. Vehicle Finance A loan scheme will be made available to support firms to replace or retrofit affected vehicles. GMCA have informed local authorities the loan scheme will be culturally complaint <p>In response to feedback from the public consultation the following additional mitigations will also be implemented:</p> <ol style="list-style-type: none"> 1. Temporary exemptions for GM licensed Hackney and PHV drivers have been extended to May 2023 2. Retrofit grants will now be available for PHV drivers as well as Hackney drivers <p>Positive Men will benefit from improvements in reduced pollution, as per the general population.</p>
Religion/ belief	Afford-ability	-	High/ Medium	High	Disproportionate	<p>It is likely there is a correlation between race and religion. Rochdale has the third largest Hackney and PHV fleet in GM. As evidenced above, a high proportion of PHV and Hackney drivers from Rochdale are from BAME, and particularly Asian, backgrounds. Any</p>

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						increases in business operating costs due the GM CAZ charges will disproportionately affect this protected characteristic group.
	<p>Negative It is likely there is a correlation between race and religion. Rochdale has the third largest Hackney and PHV fleet in GM. As evidenced above, a high proportion of PHV and Hackney drivers from Rochdale are from BAME, and particularly Asian, backgrounds. Any increases in business operating costs due the GM CAZ charges will disproportionately affect this protected characteristic group.</p> <p>Mitigations A range of initiatives have been included in the GM Clean Air Zone plan to mitigate potential negative impacts, including:</p> <ol style="list-style-type: none"> 1. Permanent discounts PHVs (owned or exclusively contracted by 1 person) licensed to one of the 10 GM local authorities and also used as a private car to be eligible to apply for a discounted charge of 5/7 of the weekly total 2. Clean Taxi Fund Grants will be available to support the replacement of compliant vehicles 3. Vehicle Finance A loan scheme will be made available to support firms to replace or retrofit affected vehicles. GMCA have informed local authorities the loan scheme will be culturally complaint <p>In response to feedback from the public consultation the following additional mitigations will also be implemented:</p> <ol style="list-style-type: none"> 1. Temporary exemptions for GM licensed Hackney and PHV drivers have been extended to May 2023 					

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	2. Retrofit grants will now be available for PHV drivers as well as Hackney drivers Positive People from BAME backgrounds are more likely to live in areas where air quality is currently poorest. They will therefore benefit from improvements in reduced pollution					
Gender reassignment/ Gender identity	Air quality	No equality impact				GM have anecdotal evidence to suggest that transgender individuals are more likely to access taxi and PHV services in order to access the night-time economy, particularly in the city centre. There is no additional data for Rochdale to suggest a difference in assessment in relation to the GM conclusion.
	Accessibility	-	Low	Low	Differential	
	Affordability					
Sexual orientation	Air quality	No equality impact				GM have anecdotal evidence to suggest that the LGBTQ community is more likely to access taxi and PHV services in order to access services safely, particularly after dark and to access the night-time economy in the city centre There is no additional data for Rochdale to suggest a difference in assessment in relation to the GM conclusion.
	Accessibility	-	Low	Low	Differential	
	Affordability	No equality impact				

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Marriage & civil partnership		No equality impact				Rochdale Council does not have any data which suggests that this protected characteristic group would experience a negative impact as a result of the introduction of the GM Clean Air Zone. Therefore, we assume there will be a neutral impact.
Military Veterans		No equality impact				Rochdale Council does not have the detailed data to determine the full impact of the GM CAP on military veterans. Until there is evidence to the contrary, we will assume there will be a neutral impact on military veterans.
Carers	Accessibility, affordability	-	Not assessed for GM	Medium / low	Disproportionate	Negative Impact Due to the generally older age profile and poorer health of carers, it is likely that they will be affected by the GM Clean Air Plan in a similar way to people with disabilities – being more reliant on community transport, public transport, taxi and PHVs because they are more likely to not drive. Changes in provision could have an adverse impact on this group in terms of affordability and accessibility to services, work and social activities. Mitigations

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						<p>To mitigate the potential negative impact on this protected characteristic group the following permanent exemptions (from charging) have been applied to the GM Clean Air Zone :</p> <ul style="list-style-type: none"> • Community minibuses • Disabled passenger vehicles • Disabled tax class vehicles <p>Following feedback from the public consultation:</p> <ul style="list-style-type: none"> • Additional permanent exemptions have been included for other LGVs and minibuses which have been specially adapted for use by a disabled user (which do not qualify for the disabled exemptions). • The temporary exemptions for GM-licensed Wheelchair Accessible Taxi and PHVs have been extended from December 2022 to May 2023. <p>The Clean Taxi Fund and Vehicle Finance Scheme are designed to mitigate the negative impact on of the GM CAZ charges on Hackney and PHV drivers/ companies.</p> <p>Positive Impact</p>

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						Some carers will have health conditions which can be adversely impacted by air pollution. Improvements in air quality are likely to benefit these individuals.
Socio Economic Characteristics	Accessibility, Affordability	-	Not assessed for GM	High/ medium	Disproportionate	<p><u>Negative impact</u></p> <p>People living in deprivation, on low incomes and in receipt of benefits are more likely to be disproportionately impacted by the implementation of the GM Clean Air Zone:</p> <ul style="list-style-type: none"> - due to the potential for increased costs for bus transport being passed onto customers via rises in passenger fares (as they are more likely to be reliant on public transport) - due to an increase in business costs (particularly for PHV and Hackney drivers, and SME's / sole traders operating LGVs) due to the implementation of charges <p>Mitigations</p>

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						<p>It is anticipated the range of measures to financially support sole traders and companies replace or retrofit older, more polluting vehicles will mitigate the potentially adverse impact of the GM Clean Air Zone charges on protected characteristic groups, namely:</p> <ol style="list-style-type: none"> 1. Clean Bus Fund 2. Clean Freight Fund 3. Clean Taxi Fund 4. Loan Finance 5. Electric Vehicle Infrastructure and Promotion <p>However, it must be acknowledged that the response to the consultation on the GM Clean Air Zone was low across all areas of GM, including Rochdale. Many of the individuals that engaged did not provide their demographic data. Therefore, the Council has limited insight into the views of residents and businesses and the potential negative impact of the GM Clean Air Plan and Zone on those with protected characteristics. It is important to continue</p>

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						<p>to engage to understand if the mitigations are sufficient to protect vulnerable groups and communities.</p> <p>Positive Impact</p> <p>However, it is also known that areas of existing high pollution often correlate with low income communities and therefore any improvements in air quality will benefit these individuals.</p>

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2.3 'Hot-spots' in your Local Authority

2.3.1 Geographical 'hot-spots' in Rochdale

Deprivation hot spots

Rochdale has high levels of deprivation. As a borough, it is one of the most deprived in the country. It is also one of the most deprived relative to other GM local authorities. The Indices of Multiple Deprivation (IMD) 2019 determined that of the 134 LSOAs in Rochdale, 40 were in the top 10% most deprived in the UK (i.e. they come within rank 1). This means that 30% of Rochdale's LSOAs are in the top 10% most deprived in the UK (in comparison to 23.3% across GM).

Income hot spots

NOMIS Official Labour Market Statistics for April 2021 reveal that 8% of GM residents (aged 16-64) are claiming benefits for unemployment. The claimant rate for Rochdale is higher at 8.8%. This represents the third highest claimant rate in GM (with only Oldham and Manchester having higher numbers at 10% and 9.3% respectively). There are certain wards within Rochdale where the claimant rate is particularly high:

- Milkstone and Deeplish 13.7%
- Central Rochdale 13.6%
- Kingsway 12.2%
- Smallbridge and Firgrove 11.6%
- West Middleton 10.8%
- Balderstone and Kirkholt 9.8%
- Spotland and Falinge 9.5%
- North Middleton 9.3%
- North Heywood 9.0%

Disability hot spots

Disability is prevalent across Rochdale as a borough. Within the borough, 14 of the 20 wards have a particularly high percentage of people reporting that their day to day activities are limited as a result of disability than the GM average:

- West Middleton (14.3%)
- Smallbridge and Firgrove (13.2%)
- North Heywood (12.3%)
- West Heywood (12.1%)
- Balderstone and Kirkholt (11.8%)
- Central Rochdale (11.6%)
- Castleton (11.6%)
- Milkstone and Deeplish (11.5%)
- East Middleton (11.1%)
- Spotland and Falinge (11.0%)
- Kingsway (10.7%)
- Hopwood Hall (10.4%)

- North Middleton (10.2%)
- South Middleton (10.1%)

2.3.2 Protected characteristic 'hot-spots' in Rochdale

Race

ONS Mid-Year Population Estimates for 2019 demonstrate that Rochdale has a particularly large number of wards with a high proportion of BAME residents:

- Milkstone and Deeplish (75.6%)
- Central Rochdale (61.1%)
- Kingsway (38.7%)
- Spotland and Falinge (29.2%)
- Smallbridge and Firgrove (26.1%)
- Bamford (20.2%)
- Healey (16.8%)
- Balderstone and Kirkholt (15.0%)
- Castleton (13.0%)
- Norden (9.2%)
- West Middleton (7.0%)
- Hopwood Hall (6.2%)
- North Heywood (5.4%)
- Wardle and West Littleborough (5.3%)
- South Middleton (5.2%)
- East Middleton (5.0%)

Age

ONS Mid-Year Population Estimates 2019 show there are a number of wards with particularly high ratios of younger (0-16years) and older (65+) residents, making them outliers:

The wards with a particularly high proportion of 0-16 year olds are:

- Balderstone and Kirkholt (25%)
- Central Rochdale (26%)
- Kingsway (27%)
- Milkstone and Deeplish (26%)
- Smallbridge and Firgrove (26%)
- Spotland and Falinge (24%)
- West Middleton (24%)

The wards with a particularly high proportion of residents aged 65+ are:

- Bamford (24%)
- Littleborough and Lakeside (23%)
- South Middleton (22%)
- Norden (21%)
- Milnrow and Newhey (21%)
- Castleton (20%)

- Healey (19%)
- Wardle and West Littleborough (18%)
- Hopwood Hall (18%)

2.4 Actions to be taken by Rochdale

2.4.1 Mitigation of potential equality impacts identified

It is anticipated that the main adverse impact of the GM Clean Air Plan and Zone will be financial.

However, the response rate to the GM Clean Air Zone consultation was low across all areas of the conurbation, including Rochdale. Many of the individuals that engaged did not provide their demographic data. Therefore, the Council has limited insight into the views of those with protected characteristics regarding the potential impact of the GM Clean Air Plan and Zone.

As a result, there are a lot of unknowns and it will be important to undertake further engagement with protected characteristic groups to assess if the mitigations which will be implemented at a GM level are sufficient to manage the equality impacts that have been identified, namely:

1. Clean Bus Fund
2. Clean Freight Fund
3. Clean Taxi Fund
4. Loan Finance
5. Electric Vehicle Infrastructure and Promotion

2.4.2 Monitoring of potential equality impacts identified

Rochdale Council will continue to monitor the impact on all protected characteristic groups by engaging in on-going dialogue to understand:

- who is accessing the range of grants and vehicle finance to support retrofit and replacement of vehicles;
- whether these mitigations meet the needs of protected characteristic groups.

2.4.3 Review of potential equality impacts identified

Dialogue will be via the Air Quality Administration Committee representative and the information considered by council officers

2.4.4 Outline local monitoring and review plan

Information provided to the Air Quality Administration Committee representative at the GM agreed meeting frequency, will be disseminated to Rochdale Council officers.

Officer consideration and actions will be co-ordinated by the Rochdale Council lead officers – currently Head of Public Protection and the Director of Neighbourhoods.

DRAFT FOR APPROVAL