

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

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



TRAFFORD
COUNCIL

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Contents

		Page
1	Local Authority EqIA Appendix	1
	1.1 Introduction	1
	1.1 Local Authority Assessment	1
	1.2 Local approach to Equality Impact	1
2	Trafford EqIA Appendix	2
	2.1 Baseline data review	2
	2.2 Equality impacts review	4
	2.3 'Hot-spots' in Trafford	10
	2.4 Actions to be taken by Trafford	10

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1 Local Authority EqIA Appendix

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 Trafford 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).

1.2 Local approach to Equality Impact

Trafford Council has Equality Impact Assessment (EIA) Guidance and Template for use by all staff teams. We have a Corporate Equality Steering Group and Strategic Delivery Group that support the undertaking of Equality Impact

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

Assessments (EIAs) including those relating to Council budget proposals, and other EIAs required when a decision or change in policy, procedure or function could have an impact on customers and /or staff that share a protected characteristic. We also regularly publish completed EIAs on the Council website. Currently we do not include socio-economics as an additional characteristic.

2 Trafford EqIA Appendix

2.1 Baseline data review

2.1.1 Introduction

The Council has reviewed local and national data available in relation to the datasets which have been presented within Appendix A of the Greater Manchester Clean Air Equality Impact Evidence Report. Information has been gathered from sources such as the Trafford Joint Strategic Needs Assessment (JSNA) which gives overarching information on the current (and future) health and social care needs of local communities in Trafford. It provides an evidence base to inform and guide the commissioning and provision of health, well-being and social care services. Information for the review has also been obtained from Healthwatch Trafford, Trafford Poverty Strategy (21/22) and the Council's Corporate Equality Strategy. Data presented from the Trafford Data Lab has allowed the Council to utilities the English Indices of Deprivation 2019 for Lower-layer Super Output Areas (LSOA) in England as part of this review.

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>The resident population of Trafford (mid-2019) is estimated at 237,354. This is made up of 60,956 individuals aged 0-19 years (25.7%), 135,215 individuals aged 20-64 years (57.1%) and 41,183 individuals aged over 65 years (17.4%).</p> <p>This increase of population of 996 compared against 2018 data is similar to data presented for the GM Clean Air Plan Equality Impact Assessment.</p>	<p>Bowdon ward has the highest percentage (25.6%) of population aged 65+ years in Trafford followed by Hale Barns (24.6) (ONS, 2019).</p>
Disability	<p><i>According to DWP data up to July 2018, Trafford Metropolitan Borough had 12,494</i></p>	<ul style="list-style-type: none"> • 1 in 20 children have an impairment • Estimates show that 1.1% of the general population will have an autistic spectrum condition

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><i>PIP claim registrations, of which 11,702 had been cleared.²</i></p> <p>There are 38,603 disabled residents in Trafford (17%), as defined by those who have a health (including mental health) problem or a physical, cognitive or sensory impairment which limits their day-to-day activities. Determining the exact number of Trafford residents living with a disability is difficult and often based on national prevalence³.</p>	<ul style="list-style-type: none"> • 4,288 adults have a learning disability • In 2015/16, 530 adults were receiving long-term support from Trafford Council because of a learning disability • As at mid- 2016/17, 944 individuals were on a GP learning disability register • A third of people with a learning disability will have a dual diagnosis of autism <p>Within Trafford LSOA areas 017B,D & E (Bucklow St Martins), 011C (Stretford) and Trafford 001A (Clifford) are within the IMDB decile 1 in relation to health deprivation and disability.³</p>
Pregnancy and Maternity	No significant variation compared to the GM data reported.	
Race	<p>ONS publishes detailed population estimates by ethnic group for areas in England and Wales following each census. On 4th December 2019, ONS produced a research report on population estimates by ethnicity and religion presenting latest findings about these estimates and pointed to the 2011 Census as the latest available National Statistics for ethnic group at local authority level. No significant variation to the GM data reported.</p>	<p>Wards in the North locality have the highest percentage of BAME communities in Trafford (Census, 2011). Clifford ward has the highest percentage (64.6%) of BAME population in Trafford, followed by 40.6% in Longford , 23.1% in Gorse Hill and 20.3% in Stretford ^{4, 5}</p>
Sex	No significant variation to the GM data reported.	

² Healthwatch Trafford Available at: <https://healthwatchtrafford.co.uk/wp-content/uploads/2018/10/The-Healthwatch-Trafford-PIP-project-report.pdf>

³ Joint Strategic Needs Assessment Available at: <http://www.traffordjsna.org.uk/Trafford-JSNA.aspx>

⁴ Corporate Equality Strategy 2021-2025 Available at: <https://www.trafford.gov.uk/about-your-council/strategies-plans-and-policies/equality-and-diversity/docs/Corporate-Equality-Strategy.pdf>

⁵ ONS 2019

Protected Characteristic	Overview for the local authority; including updated data and / or significant variation or similarity compared to the GM picture.	'Outliers' within the Local Authority (LSOAs or communities with a particularly high proportion of a protected characteristic to highlight a distributional impacts)
Religion / Belief	No significant variation to the GM data reported.	Within Trafford, the dominant religious group in all wards is Christian except for Clifford Ward where Muslims form the largest faith group (48%). There is also a significant minority of Muslim residents in Longford ward (30.1%) and Jewish residents in Hale Barns (13.2%). ⁶
Gender reassignment/ Gender identity	We recognise that this is a data gap and we will work with partners to develop our knowledge and get the best data available	
Sexual orientation	Capturing accurate data is problematic as we need to develop people's confidence in disclosing their sexuality, however, we do have the following data, and we can extrapolate from this to estimate figures for Trafford. Greater Manchester has an estimated 215,000 LGBT people - https://lgbt.foundation/actionplan	
Marriage & civil partnership	For the year, April 2019 to March 2020 there were 112 religious marriages, 429 civil marriages and 11 civil partnership formations. Source: Trafford Council Registration Service (BDM – Birth, Death, Marriages)	

2.1.3 Socio-Economic Characteristics

Under Equality Law, 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. **Trafford also do not include socioeconomic status within their EqIAs.**

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). Any differences

⁶ ONS, 2011 Census

between the GM assessment and that for Trafford are identified along with an explanation of these differences.

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Protected characteristic	Assessment topic	Impact (+/-)	Magnitude of impact post mitigation (extent of population exposure to impact)		Differential/ Disproportionate	Reason for difference in impact from GM assessment
			GM	Trafford		
Age	Air quality	+	High	High	Differential	Younger and older people are more sensitive to changes in air quality and will benefit more quickly from improvements in air quality. No significant variation to the GM impact assessment.
	Accessibility	-	Low	Low	Disproportionate	Younger and older people are more reliant on public transport, taxi and PHVs. They are also more likely to use minibuses and community transport. Any changes in provision would have a disproportionate impact on this group. No significant variation to the GM impact assessment.
	Affordability	-	Low	Low	Disproportionate	Younger and older people are more reliant on public transport, so any ticket prices increases would be disproportionately experienced by these groups. No significant variation to the GM Impact Assessment.
Disability ⁷	Air quality	+	High	High	Differential	People with disabilities (particularly if these relate to respiratory problems) are likely to be more sensitive to changes in air quality and will benefit more quickly from improvements in air quality. No significant variation to the GM Impact Assessment.
	Accessibility	-	Low	Low	Disproportionate	Disabled people 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 and be reliant on parking provision. Any changes in provision would have a disproportionate impact on this group. No significant variation to the GM Impact Assessment.

⁷ 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 (+/-)	Magnitude of impact post mitigation (extent of population exposure to impact)		Differential/ Disproportionate	Reason for difference in impact from GM assessment
			GM	Trafford		
	Affordability	-	Low	Low	Disproportionate	Disabled people are more reliant on public transport, taxis and PHVs. Increased cost of travel to places of work, education, social/leisure activities if costs related to non-compliance/upgrading to a compliant vehicle are passed onto passengers.
Pregnancy and maternity	Air quality	+	High		Differential	Extremely low-dose exposures to pollutants during windows of vulnerability in utero and in early infancy may result in health effects throughout their lifespan. No significant variation to the GM Impact Assessment.
	Accessibility	No equality impact				
	Affordability	No equality impact				
Race ⁸	Air quality	+	High	High	Disproportionate	People from BAME backgrounds are more likely to live in areas of GM where air quality is currently poorest. They will therefore disproportionately benefit from improvements in air quality.
	Accessibility	-	Low	Low	Disproportionate	People from BAME backgrounds are more reliant on public transport therefore changes in service would affect them disproportionately. No significant variation to the GM Impact Assessment.

⁸ 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 (+/-)	Magnitude of impact post mitigation (extent of population exposure to impact)		Differential/ Disproportionate	Reason for difference in impact from GM assessment
			GM	Trafford		
	Affordability	-	Low	Low	Disproportionate	People from BAME backgrounds are more reliant on public transport therefore increased costs would affect them disproportionately. A high proportion of taxi drivers are from BAME backgrounds. Any increases in business costs are therefore likely to be experienced disproportionately by this group.
Religion/ Belief	Air quality	+	High	High	Disproportionate	No difference to GM
	Accessibility	No equality impact				
	Affordability	-	Low	Low	Disproportionate	A high proportion of taxi drivers are from Muslim backgrounds in particular. Any increases in business costs are therefore likely to be experienced disproportionately by this group. No difference to GM
Sex	Air quality	No equality impact				
	Accessibility	No equality impact				
	Affordability	-	Medium	Medium	Disproportionate	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.
	Air quality	No equality impact				

Protected characteristic	Assessment topic	Impact (+/-)	Magnitude of impact post mitigation (extent of population exposure to impact)		Differential/ Disproportionate	Reason for difference in impact from GM assessment
			GM	Trafford		
Gender reassignment	Accessibility	-	Medium		Differential	We do not have data to assign magnitude of impact
	Affordability	No equality impact				
Sexual orientation	Accessibility	-	Low		Differential	We do not have data to assign magnitude of impact

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2.3 'Hot-spots' in Trafford

2.3.1 Geographical 'hot-spots' in Trafford

Within Trafford LSOA areas 017B,D & E (Bucklow St Martins), 011C (Stretford) and Trafford 001A (Clifford) are within the IMDB decile 1 in relation to health deprivation and disability.

Wards in the North locality have the highest percentage of BAME communities in Trafford (Census, 2011). Clifford ward has the highest percentage (64.6%) of BAME population in Trafford, followed by 40.6% in Longford, 23.1% in Gorse Hill and 20.3% in Stretford (ONS, 2019).

Bowdon ward has the highest percentage (25.6%) of population aged 65+years in Trafford followed by Hale Barns.

2.3.2 Protected characteristic 'hot-spots' in Trafford

Trafford has a higher percentage of population aged 5 to 15 years and older working age groups (35-54 years) compared with England.

There are 38,603 disabled residents in Trafford (17%) as defined by those who have a health (including mental health) problem or a physical, cognitive or sensory impairment which limits their day-to-day activities.

2.4 Actions to be taken by Trafford

2.4.1 Mitigate any potential equality impacts identified.

Within the GM Clean Air Plan there are a number of schemes and mitigation measures which will be employed to support the transition to compliant vehicles and reduce the impact on businesses and communities. These mitigation measures will include charging exemptions, discount charges for private hire vehicles, a Clean Bus fund, a Clean Taxi fund and a Clean Commercial Vehicle fund.

Trafford Council will ensure that communication regarding support for businesses is provided to business groups within Trafford and through media channels available to the Council. Notification of support available to licensed vehicle owners will also be provided. The Council will work with TFGM to implement the GM Clean Plan communication strategy.

Information and communication regarding funding and mitigation will be shared via the Trafford Partnership. Council partners include residents, community groups, the voluntary sector, public services and private businesses. Through working with the Trafford Partnership it will allow communication with a wide range of residents and businesses to provide all relevant information.

This work will reduce potential adverse impacts of the Clean Air Plan measures and increase uptake of assistance to improve compliance with requirements of the plan.

2.4.2 Monitor any potential equality impacts identified.

The Council will work with TfGM to identify data sets and evidence which will inform Local Authorities of impacts on protected characteristics.

Data from TfGM which will need to be reviewed will include accessing the level of funding which has been applied for (and received) by businesses and vehicle owners within Trafford. It will also be necessary to monitor the levels of use of public transport to see if there is any decline or increase in usage, if there has been any changes in the level of public transport service across Trafford and if there has been any increases in costs which could potentially affect specific groups.

At a local level within Trafford, the following data will be reviewed:

- Monitor levels of private hire and taxi vehicles in Trafford.
- Monitor age and compliance of private hire and taxi vehicles in Trafford.
- Monitor age and compliance of community transport vehicles utilised by the Council.

The Council's Economic Growth Team will be contacted in relation to obtaining feedback of impacts from the implementation of the Clean Air Plan from commercial and business groups within Trafford.

In relation to potential impacts on disabled people and the BAME community within Trafford a method of collecting feedback will need to be established.

Review any potential equality impacts identified.

Trafford Council will undertake a review of potential equality impacts 12-18 months after implementation of the GM Clean Air Plan implementation. This review will be done in conjunction with TfGM.

2.4.3 Outline local monitoring and review plan.

A key aspect of the implementation of the Greater Manchester Clean Air Plan is assessing its effectiveness through defined monitoring mechanisms.

The Council will regularly assess the overall progress of the Greater Manchester Clean Air Plan. This will include updates of mitigation measures that are to be provided to businesses and residents within Trafford.

Data on progress of the plan and uptake of funding that is available will be used to inform any change to policies or additional actions considered to be required.

A key aspect of the Council review will be to seek feedback from business and community groups on impacts they may experience from the measures contained within the Clean Air Plan.

Data available to the Council on number and make up of licensed private hire vehicles and taxi's, the Council's own fleet and community transport utilised by the Council will also be used to inform the monitoring and review plan.

The Council will also work with the TfGM to review data that is being obtained as part of implementation of the plan and other key data sets such as public transport usage and sustainable transport.

Feedback on improvements and changes can be taken into account and reviewed with TfGM to provide additional assistance where required.

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