

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

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



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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.

1.2 Local Authority Assessment

This appendix to the GM EqIA includes an assessment of equality carried out by Bury 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://cleanaigm.com/technical-documents/>

2 Bury Council EqIA

2.1 Baseline data review

2.1.1 Introduction

For this section we have considered relevant available ONS population data alongside our own Neighbourhood Profile documents for each of our neighbourhoods, namely Bury West, Bury East, Bury North, Whitefield and Prestwich. This has allowed us to identify how we compare to Greater Manchester profiles and also any specific issues that relate to the impact of the Greater Manchester Clean Air Plan on individual neighbourhoods.

Baseline data

In- Scope Protected Characteristic	Overview for Bury; including updated data and / or significant variation compared to the GM picture.	'Outliers' within Bury (LSOAs or neighbourhoods where there could be particular distributional impact / focus)
Age	Data available is the same as that at GM level and indicates that Bury has a slightly higher proportion of those over 65 and slightly less between 16 – 64. Life expectancy figures for Bury are similar to GM figures	The neighbourhoods of Bury North, Whitefield and Bury West have higher proportions of over 40 age groups than overall Bury figures. Bury East and Prestwich have higher proportions of children aged 0-14
Disability	Data available is the same as that at GM level and indicates that Bury's percentages for those with long term health problems or disabilities are very similar to the GM levels.	All neighbourhoods have areas with high concentrations of residents living with long term conditions or disability.
Pregnancy and Maternity	Data available is the same as that at GM level and indicates that Bury's percentage of females giving birth is slightly less than the GM average	No specific distributional impacts
Race	Data available is the same as that at GM level. Bury's minority ethnic population is around 10.8% Percentages of ethnic groups tends to be mainly slightly less than the GM average except for Black African Caribbean Black British people where Bury has 1.8% less	Bury East neighbourhood has by far the highest percentage of minority ethnic residents at 23% which is significantly higher than both the borough and national average. Prestwich is next highest with 14%
Religion	Data available is the same as that at GM level and indicates that Bury has a	Census data indicates that our Jewish populations are mainly concentrated in the

	higher proportion of Jewish people in our communities than the GM average	south of the borough in Whitefield and Prestwich. Although similar to GM percentages it is worth noting that our Muslim population is mainly concentrated in the Bury East neighbourhood
Sex	Data available is the same as that at GM level and is very limited. We are therefore not able to compare local with GM figures and percentages	No specific distributional impacts
Transgender	Data available is the same as that at GM level and is very limited. We are therefore not able to compare local with GM figures and percentages	No specific distributional impacts
Socio Economically Vulnerable	This characteristic is not considered at a GM level but will be included in this Bury specific assessment	Bury East has the most areas of high deprivation with some areas falling within the most 3% deprived in the country. Areas in Prestwich neighbourhood are also in the top 10% although pockets of deprivation can be found throughout the borough.
Carers	This characteristic is not considered at a GM level but will be included in this Bury specific assessment	The distribution of carers is closely linked with the geographical location of those with long term health conditions and disabilities. Carers are fairly evenly distributed across our neighbourhoods.
Veterans	This characteristic is not considered at a GM level but will be included in this Bury specific assessment	A consideration of GP data suggest that veterans are distributed throughout our borough. There appears to be higher number registered with GP practices in Bury Town Centre and in Prestwich.

2.2 Equality impacts review

The following table summarises the equality impact assessment for the scoped-in characteristics for Bury in relation to the GM assessment described in the full GM CAP EqIA.

For this section we also considered the responses to the Greater Manchester Clean Air Plan consultation. However, it was difficult to draw any firm conclusions in relation to protected groups and as the data was not wholly representative of the population in our district it was felt it could not be used statistically.

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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 and any areas of local consideration
			GM	Bury		
Age	Air quality	+	High	High	Differential	<p>No difference to GM assessment overall.</p> <p>We might expect cleaner air to have a greater health impact on those areas with higher proportions of older and younger age groups. Bury North, Bury West and Whitefield have high levels of those over 40 and. Bury East and Prestwich neighbourhoods have higher proportions of younger children coupled with high levels of deprivation. We know that we have specific issues meeting targets for NO2 in Bury East, Whitefield and Prestwich and therefore the impact of the proposed CAZ would be expected to have an enhanced positive impact on those older and younger age groups in these geographical areas.</p>
	Accessibility	-	Low	Low	Disproportionate	<p>No difference to GM assessment overall.</p> <p>CAZ charges for coaches may impact on the number of coaches visiting Bury Market and Bury Town Centre. Coach trips to Bury Market and Town centre are heavily used by older age groups and any loss in this service would have a negative impact.</p> <p>Any loss in numbers of bus or taxi services caused by the CAZ charges would also impact on older people who use these means of transport to access local leisure, shopping, and employment facilities. Any impacts like this may be seen more in Bury North, Bury West and Whitefield where we have higher percentages of older age groups.</p>
	Affordability	-	Low	Low	Disproportionate	<p>No difference to GM assessment overall.</p> <p>There is a risk that CAZ charges will result in increased bus and taxi fares as operators may look to pass on their increased costs. Many older people rely on taxi and bus services to access leisure and shopping facilities and therefore this would increase their regular costs and may make some trips unaffordable. Any impacts like this may be seen more in</p>

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 and any areas of local consideration
			GM	Bury		
						Bury North, Bury West and Whitefield where we have higher percentages of older age groups.
Disability²	Air quality	+	High	High	Differential	<p>No difference to GM assessment overall.</p> <p>People living with long term conditions and disability are found in significant concentrations throughout our neighbourhoods and we would expect that improved air quality would benefit many of these people.</p>
	Accessibility	-	Low	Low	Disproportionate	<p>No difference to GM assessment overall.</p> <p>Any loss in numbers of bus or taxi services caused by the CAZ charges would impact on those with conditions or disabilities that impact their mobility. This cohort often rely on public transport and taxis services to access local employment, education, leisure, and shopping facilities.</p> <p>There are existing limitations in public transport routes running from the west to the east of the borough. This can restrict opportunities for those in the west to access job opportunities in the east. This problem is particularly acute for those with health conditions and disabilities. The current strategic plans aim to develop the “Northern Gateway” which will be a large mixed commercial and residential development in the east of the borough. This will provide huge employment opportunities for our borough. However, we recognise the need to develop the west to east bus services so that all our residents can benefit from these opportunities. If CAZ proposals limit the possibilities of increasing west to east services, there will be an increased negative impact on employment chances for those on the west and specifically those with health problems and disabilities.</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 (+/-)	Magnitude of impact post mitigation (extent of population exposure to impact)		Differential/ Disproportionate	Reason for difference in impact from GM assessment and any areas of local consideration
			GM	Bury		
	Affordability	-	Low	Low	Disproportionate	No difference to GM assessment overall. There is a risk that CAZ charges will result in increased bus and taxi fares as operators may look to pass on their increased costs. Many of those with long term health conditions and disabilities rely on taxi and bus services to access employment, education, leisure, and shopping facilities. Any increases in fares will increase their regular costs and may result in some journeys becoming unaffordable. This could have an impact throughout our borough.
Pregnancy and maternity	Air quality	+	High	High	Differential	No known specific issues for Bury Residents beyond the GM assessment findings
	Accessibility	No equality impact				No known specific issues for Bury Residents beyond the GM assessment findings
	Affordability	No equality impact				No known specific issues for Bury Residents beyond the GM assessment findings
Race³	Air quality	+	High	High	Disproportionate	Bury East neighbourhood has by far the highest percentage of minority ethnic residents in our borough, and this is coupled with high levels of deprivation. There are a number of areas in Bury East that have been identified as having specific problems meeting NO ₂ targets. The impact of the proposed CAZ would be expected to have a significant positive impact on the minority ethnic community in this area.
	Accessibility	-	Low	Low	Disproportionate	People from minority ethnic backgrounds are more reliant on public transport and we have the highest proportion of minority ethnic residents in Bury East. Any reduction in service resulting from the CAZ charges could have an amplified impact in Bury East.

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 (+/-)	Magnitude of impact post mitigation (extent of population exposure to impact)		Differential/ Disproportionate	Reason for difference in impact from GM assessment and any areas of local consideration
			GM	Bury		
	Affordability	-	Low	Low	Disproportionate	<p>People from minority ethnic backgrounds are more reliant on public transport and we have the highest proportion of minority ethnic residents in Bury East. Any increase in fare prices as a result of the CAZ charges could have an amplified impact in Bury East.</p> <p>A high proportion of taxi/PHV drivers are from minority ethnic backgrounds. Any increases in business costs are therefore likely to be more significant in Bury East.</p>
Religion	Air Quality		High	High	Disproportionate	<p>We have a higher proportion of Jewish people than GM and these residents mainly live in Whitefield and Prestwich. It is also worth noting that we have a high proportion of Muslim people living in Bury East These geographical locations all have areas that have been identified as having specific problems meeting NO₂ targets. The impact of the proposed CAZ would be expected to have a significant positive impact on the Jewish and Muslim communities in these areas.</p>
	Accessibility		Low	Low	Disproportionate	<p>Those Jewish and Muslim people who are reliant on public transport maybe disproportionately impacted by any reduction in service resulting from the CAZ charges This impact could therefore be amplified in Bury East, Whitefield and Prestwich.</p>
	Affordability		Low	Low	Disproportionate	<p>Those Jewish and Muslim people who are reliant on public transport maybe disproportionately impacted by any increase in public transport fares resulting from the CAZ charges. This impact could therefore be amplified in Bury East, Whitefield and Prestwich.</p> <p>A high proportion of taxi/PHV drivers are from minority ethnic backgrounds and are from our Muslim communities. Any increases in</p>

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 and any areas of local consideration
			GM	Bury		
						business costs are therefore likely to be more significant in Bury East where we have a high concentration of Muslim residents.
Sex	Air quality	No equality impact				No known specific issues for Bury Residents beyond the GM assessment findings
	Accessibility	No equality impact				No known specific issues for Bury Residents beyond the GM assessment findings
	Affordability	-	Medium	Medium	Disproportionate	No known specific issues for Bury Residents beyond the GM assessment findings
Gender Reassignment	Air quality	No equality impact				No known specific issues for Bury Residents beyond the GM assessment findings
	Accessibility	-	Low	Low	Differential	No known specific issues for Bury Residents beyond the GM assessment findings
	Affordability	No equality impact				No known specific issues for Bury Residents beyond the GM assessment findings
Socio - economically vulnerable	Air quality	+	Not assessed at GM level	High	Disproportionate	<p>Bury East neighbourhood has the highest levels of deprivation in our borough. There are a number of areas in Bury East that have been identified as having specific problems meeting NO₂ targets. As a result, the impact of the proposed CAZ would be expected to have a significant positive impact on the socio economically vulnerable in this neighbourhood.</p> <p>We also have issues meeting NO₂ targets in the eastern sections of Bury West, and in parts of Whitefield and Prestwich along the A56. It is</p>

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 and any areas of local consideration
			GM	Bury		
						noticeable that there are areas of higher levels of deprivation in these areas. We would expect that the impact of the proposed CAZ would have a significant positive impact on the socio economically vulnerable in these areas
	Accessibility	-	Not assessed at GM level	Low	Disproportionate	<p>Socio -economically vulnerable people are more reliant on public transport and there are high levels of deprivation in Bury East. Any reduction in public transport service resulting from the CAZ charges could have an amplified impact in Bury East. This same impact could be severely felt in other pockets of high deprivation throughout our borough.</p> <p>There are existing limitations in public transport routes running from the west to the east of the borough. As mentioned above this can restrict opportunities for those in the west to access job opportunities in the east. If the CAZ hinders any increases in public transport services from West to east this could have a detrimental impact on the job opportunities of the socio economically vulnerable in Bury West neighbourhood.</p>
	Affordability	-	Not assessed at GM level	Medium	Disproportionate	<p>Socio -economically vulnerable people are more reliant on public transport and there are high levels of deprivation in Bury East. Any increase in fare prices as a result of the CAZ charges could have an amplified impact in Bury East. This same impact could be severely felt in other pockets of high deprivation throughout our borough.</p> <p>Bury East has both highest levels of deprivation and also highest percentages of minority ethnic residents. In considering the impact of the GM Clean Air Plan on race we noted that many taxi/PHV drivers are from minority ethnic backgrounds and therefore any increase in business costs resulting from the CAZ would have an amplified impact here. This impact would be even worse for those minority ethnic residents in Bury East who</p>

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 and any areas of local consideration
			GM	Bury		
						are also socio -economically vulnerable. These impacts could be significantly exacerbated by the ongoing impacts for the COVID pandemic.
Sexual orientation	Accessibility	-	Low		Differential	
Carers	Air Quality	No equality impact				
	Accessibility		Not assessed by GM	Low	Disproportionate	Carers are more likely to be accompanying a disabled person and rely on taxis or PHVs. Any decrease in volume of service due to the increased costs of the CAZ would disproportionately affect this group.
	Affordability				Disproportionate	Carers may be more likely to be in lower income roles or be receiving benefits, due to their caring commitments, and therefore maybe more reliant on taxis and public transport so they may be disproportionately affected by any increases in the cost of taxis/PHVs and public transport.
Veterans	Air Quality		Not assessed by GM	High	Disproportionate	Improvements in air quality will have a positive impact on this groups as it would with all other residents living working or learning in the borough
	Accessibility	No equality impact				Impacts as a result of being a veteran are unlikely but could impact this group if they have one of the other protected characteristics
	Affordability	No equality impact				Impacts as a result of being a veteran are unlikely but could impact this group if they have one of the other protected characteristics

2.3 'Hot-spots' in Bury.

Although the profiles for Bury are fairly similar to GM there are specific characteristics of our local neighbourhoods that may lead to specific impacts in relation to equality. These impacts are described below.

The assessment above indicates that the positive impacts of cleaner air are likely to be amplified in Bury East where we have high proportions of minority ethnic and socio economically vulnerable people and also areas with high nitrogen dioxide pollution.

Bury East's high levels of minority ethnic and socio economically vulnerable residents also suggest that any loss in bus or taxi services or increase in fares will have a more pronounced impact in this area. Many taxi/PHV drivers are from minority ethnic backgrounds and therefore any increase in business costs resulting from the CAZ could have an amplified impact in Bury East.

Any increases in public transport/taxi fares or reductions in public transport taxi services would also have a disproportionately negative impact on socio economically vulnerable people in other pockets of deprivation which exist throughout our borough.

We have proportions of Jewish residents living mainly in the south of our borough in Whitefield and Prestwich. It is difficult to gauge the extent of any negative impacts on this community, but it is clearly something we should assess as proposals are implemented.

There are existing limitations in public transport routes running from the west to the east of the borough. As mentioned above this can restrict opportunities for those in the west to access job opportunities in the east. Current strategic plans aim to develop the "Northern Gateway" which will be a large mixed commercial and residential development in the east of the borough. This will provide huge employment opportunities for our borough. If CAZ proposals limit the possibilities of increasing west to east services, there will be an increased negative impact on employment chances for those in Bury West specifically those with health problems disabilities, and the socio economically vulnerable.

Any loss in public transport services or increase in fares that may result from the GM CAP may have more of a negative impact in Bury North, Bury West and Whitefield where we have higher percentage of older residents that rely on these means of transport.

2.4 Actions to be taken by Bury Council.

Actions will be taken to review and assess the potential negative impacts that are specific to our borough. These can be described as follows: -

Community fora will be used to gauge the thoughts and views of our local communities in relation to their neighbourhoods and on specific themes from summer 2021 onwards. These new fora will be used to assess views and impacts of Clean Air Plan actions and supporting measure throughout our borough.

Where issues are found we will work with TfGM to find possible solutions, where available and appropriate.

As part of the development of our Climate Action Plan, from summer 2021 we will be working closely with community groups to identify local opportunities and barriers in relation to the Climate Change Agenda. This interaction with our local communities and businesses provides a further opportunity for any issues with the Clean Air Plan and impacts on local transport to be raised.

We will work closely with TFGM to develop the public transport routes from west to east of our borough and ensure that the CAZ doesn't have a detrimental impact on the quality or value of these services. This action will be supported by actions to improve the quality and safety of active travel routes from west to east.

We will liaise closely with TfGM to assess take up of supporting financial measures across our neighbourhoods to ensure that the supporting measures are effective and appropriate for the businesses in our communities. Where there are issues with level of take up, we will work with TfGM and neighbouring GM councils to review support packages and amend as necessary.

We will also liaise closely with Bury Market officers and TfGM to assess the impacts of the CAZ on coach services travelling to and from Bury Market. Where we identify issues, we will work with coach operators and TfGM to implement measures to protect the viability of the market as a regional destination and leisure attraction.