

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

## Appendix 2 - GM CAP EQIA following consultation - Evidence report - Wigan assessment



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DRAFT FOR APPROVAL

# 1 Local Authority EqIA

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## 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 EqIA<sup>1</sup>.

## 1.1 Local Authority Assessment

This appendix to the GM EqIA includes an assessment of equality carried out by Wigan 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 Wigan's approach to Equality Impact

As a Council, we have identified the importance of ensuring everyone has the same opportunities and people feel like they belong and are included in the borough. A key element within The Deal 2030 priorities is to create 'fair and

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

inclusive' arrangements where all our residents can flourish and reach their potential, regardless of age, sex, sexual orientation, gender reassignment, race, disability, or social standing.

A strong focus on equality and diversity is more important than ever as we, nationally and locally, look to respond to the impact of the COVID19 pandemic. The pandemic has highlighted and exasperated inequalities and its legacy will be felt for years to come. As a Council, we were quick to react to COVID19 and implement support for our residents who needed assistance. This has reminded us that our priority around a 'fair and inclusive' borough is the right one to pursue, only now we need to go faster and pursue this aim more strongly than ever.

We have been working to review how we approach Equality, Diversity, and Inclusion (EDI), looking at our approach and how we embed equality across everything we do (policy, decision taking and service planning).

The public sector equality duty protects people from discrimination on the basis of certain characteristics which are known as the nine protected characteristics. Wigan has also chosen to adopt three additional characteristics:

- carers,
- armed forces personnel and
- socioeconomic disadvantaged.

Our EDI Steering group is a coalition of public, community and voluntary groups and organisations from a wide range of communities of experience across Wigan. Established to tackle inequalities and ensure a fair and inclusive borough, through collaboration. The group serves to:

- Connect communities to policy makers, and vice versa.
- To assist with strategic equality and diversity work within Wigan.
- Establishes a pan-equalities (i.e., cross-cutting) approach.
- Tackle the root-causes of inequalities.

Our most recent Public Sector Equality Duty annual report and our current equality vision and aims can be found [here](#).



GM CAP EqIA In-Scope Protected Characteristic	Overview for the local authority; including updated data and / or significant variation compared to the GM picture.	'Outliers' within the Local Authority (LSOAs or communities with a particularly high proportion of a protected characteristic to highlight any distributional impacts)
	<p>Disability Living Allowance is a legacy benefit and has been replaced by Personal Independence Payment (PIP). In Wigan there were 26,673 claimants as of January 2021.</p> <p>Statistics of the number of valid Blue Badges held by individuals within GM identifies Wigan as having the highest proportion (6.1%).</p>	<p>E01006215 E01006239</p> <p>PIP outliers</p> <p>E01006386 E01006343 E01006272 E01006248 E01006253</p>
<b>Pregnancy and Maternity</b>	<p>59.2 births per 1000 females aged 15-44 in Wigan. Across GM in 2018 it is estimated that 2.46% of the female population had a live birth. The figure in Wigan is 2.09%.</p>	<p>Birth outliers</p> <p>E01006218 E01006217 E01006352</p>
<b>Race</b>	<p>97.6% of population in Wigan is white British. In the wider GM, Wigan is the least diverse in terms of race.</p>	<p>The ethnicity % of residents that are white ranges from 87.9% to 99.7% across the LSOA's.</p> <p>The outliers are:</p> <p>E01006370 E01006333 E01006328</p>
<b>Religion</b>	<p>The 2011 Census showed that the vast majority of residents in Wigan (77.8%) consider themselves to be Christian. Of the remaining Wigan population 15.3% stated they had no religion and 5.5% didn't provide a reply. The remaining 1.4% was from other religions.</p> <p>Of the 4,369 residents that stated they were from non-Christian religions, just less than half (49.5% - 2,162) were Muslim. The 2011 census data shows that residents self-reporting their religion as Buddhist or Hindu each equate for about a sixth of the non-Christian religions.</p>	



Protected Characteristic	Overview for the local authority; including updated data and / or significant variation compared to the GM picture.	'Outliers' within the Local Authority (LSOAs or communities with a particularly high proportion of a protected characteristic to highlight any distributional impacts)
Armed forces personnel	Wigan Borough has a large population of Armed Service Leavers. 22,000 men and women have returned to the borough after service. This is a large population in comparison to other areas of Lancashire and GM outside of Preston.	At present the data can be broken down to lower than the borough level so it is not possible to provide outliers
Socioeconomic disadvantage	Wigan is ranked 85th out of 326 Local Authorities for deprivation (1 is most deprived)	According to the English indices of deprivation 2019, of the 200 Lower Super Output Areas (LSOAs) in the Borough 57 are in the 20% most deprived LSOAs in England. 28.6% (91,773) of the Borough's population live in these areas.

### 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. In Wigan socio-economic disadvantage has been formally adopted as a protected characteristic (in 2019).

Areas of existing high pollution often correlate with lower income communities and therefore any improvements in air quality would disproportionately benefit these communities. Economically disadvantaged groups are more likely to include young people, unemployed, long-term sick and people from Black, Asian and Minority Ethnic backgrounds.

## 2.2 Equality impacts review

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

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	Wigan		
Age	Air quality	+	High	High	Differential	Groups that are more vulnerable to air quality are older people and children. The CAZ will improve air quality, and this will have a beneficial impact on those groups to improve health outcomes. There is a very similar age distribution across the populations of Wigan and GM, therefore the impacts on this group are similar.
	Accessibility	-	Low	Low	Disproportionate	There is a risk that the CAZ may reduce service frequency or cost of public transport. Older people and young people (under 16), students (24 and under) who have concessionary cards are more affected. Wigan has a similar age population as GM and therefore impacts are broadly similar.
	Active transport	+	Low	Low	Disproportionate	Younger and older age groups are more likely not to have a car, they would benefit from policies that promote alternative travel options. Sustainable transport options are not included within the GM CAP, however it is a key part of the GM Transport Strategy 2040. The impacts within Wigan are similar to the GM picture.
	Affordability	-	Low	Low	Disproportionate	The GM CAP will potentially increase the cost of travelling by bus, taxi and PHV as operators may pass the cost of compliance onto passengers. Numbers of taxis/PHVs may decline which will increase market demand and lead to higher prices, this will disproportionately affect younger and older groups. Of the persons in Wigan responding to the consultation, the majority of those that owned, leased or drove a LGV or HGV were between 25 and 64, therefore working aged persons are disproportionately affected by the charges being introduced by the CAP. The age distribution within Wigan is broadly similar to

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	Wigan		
						GM and therefore there is no expected difference in the impact on this group within Wigan.
Disability <sup>2</sup>	Air quality	+	High	High	Differential	Those persons with a disability or long-term illness are disproportionately affected by poor air quality, therefore any perceived improvements in air quality will result in improved health outcomes and therefore has a beneficial differential impact on this group. Wigan have a slightly higher percentage of people limited by disability (11% according to the 2011 census, compared with 9.8% of the GM population) and therefore remains high positive impacts.
	Accessibility	-	Low	Low	Disproportionate	People limited by disability will be disproportionately affected by the accessibility of transport, such as minibuses, coaches, buses, PHVs and taxis. The charges may reduce the volume of the services provided. The impacts upon this group may be slightly higher than the GM assessment due to the higher proportion of people limited by disability compared to the overall GM figure.
	Affordability	-	Low	Low	Disproportionate	There is the potential for the costs of compliance to be passed onto passengers and possible reduction in supply may also leading to increased costs. There is a correlation between disability and socioeconomic disadvantage as a proportion of disabled persons are not able to work and receive means-tested benefits. People in Wigan limited by disability, who rely on vehicles affected by the GM CAP, will see a disproportionate negative impact, again, this would be slightly higher than the

<sup>2</sup> 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	Wigan		
						GM assessment. Those disabled residents who have been granted mobility vehicles will not be affected
Pregnancy and maternity	Air quality	+	High	High	Differential	Women in pregnancy and maternity are more likely to be adversely affected by air pollution, therefore any improvements in air quality will have a differential beneficial effect. Overall Wigan had a slightly lower birth rate than the GM average, so the net benefit is thought to be the same or slightly greater within Wigan.
	Accessibility	No impact				
	Affordability	No equality impact				Parents on reduced income due to maternity may experience affordability issues if the cost of public transport increases due to the CAZ.
Race <sup>3</sup>	Air quality	+	High	High	Disproportionate	Wigan has a lower percentage of black, Asian and minority ethnic than GM. People of Black, Asian and Minority Ethnic background are more likely to live in areas with existing poor air quality. They are disproportionately more likely to experience positive benefits from improved air quality.
	Accessibility	-	Low	Low	Disproportionate	Persons from a black, Asian and minority ethnic background are more likely to rely on public transport and are therefore disproportionately affected. The magnitude of impact on black, Asian and minority ethnic groups is judged to be similar to GM, with the exception of 3 outliers where the percentage of black, Asian and ethnic minorities significantly differ from the average.

<sup>3</sup> 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	Wigan		
	Affordability	-	Low	Low	Disproportionate	<p>People from black and minority ethnic community backgrounds are more reliant on public transport therefore increased costs would disproportionately affect this group.</p> <p>Using data from the CAP consultation from the CAP consultation, approximately 25% of PHV drivers and 6% of Hackney drivers that responded in Wigan are from black, Asian and minority ethnic community backgrounds. Any increases in business costs due to the CAZ are likely to disproportionately impact this group.</p>
Religion <sup>4</sup>	Air quality	No equality impact				
	Accessibility	No equality impact				
	Affordability	-	Low	Low	Disproportionate	There is evidence to suggest that a significant proportion of taxi and PHV drivers are from minority faiths and would therefore experience disproportionate adverse impacts.
Sex	Air quality	No equality impact				
	Accessibility	No equality impact				

<sup>4</sup> religion covers all religions identified within the ONS dataset. Where the impact would differ for different religions, 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	Wigan			
	Affordability	-	Medium	Medium	Disproportionate	Taxi drivers, PHV drivers and bus drivers are over 90% more likely to be male than female. The majority of people who responded to the questionnaire to say they drove a LGV or HGV were predominantly male. Any business costs are therefore likely to be disproportionately experienced by men. The magnitude of impact is judged to be the same as the GM assessment.	
Gender Reassignment	Air quality	No equality impact				Disproportionate	Persons with gender reassignment or gender identity issues may face greater chances of experiencing hate crime. These group may therefore be more likely to take public transport or taxi/PHV, and therefore changes in services or affordability will disproportionately affect this group.  No known specific issues for Wigan residents beyond the GM assessment findings
	Accessibility	-	Low	Low			
	Affordability	-	Low	Low			
Carers	Air Quality	No equality impact				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.  Carers may be more likely to be in lower income roles or be receiving benefits, due to their caring commitments, and therefore are maybe more reliant on taxis and public transport
	Accessibility	-		Low			
	Affordability	-		Low			

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	Wigan		
						so they may be disproportionately affected by any increases in the cost of taxis/PHVs and public transport.
Armed forces personnel	Air Quality	+		Medium	Disproportionate	The highest percentages of veterans are over 65 years of age and are male. A quarter of all aged over 75 are classed as veterans. This percentage of the population may be more likely to have a disability or experience ill health, therefore any benefits to air quality will positively impact this group.
	Accessibility	-		Low	Disproportionate	According to conclusions drawn from the 2011 census, over half of all veterans in Wigan Borough are over 65 and are entitled to free public transport. Any impacts in services would disproportionately affect this group.
	Affordability	-		Low	Disproportionate	Due to the characteristics of this group, veterans are more likely to be elderly or experience disability and utilise PHVs/Taxis as a means of transport. Any increase in cost due to the cost of compliance with the CAZ being passed on, would disproportionately negatively impact veterans.
Socioeconomic characteristics	Air Quality	+	Not assessed for GM	High	Disproportionate	Those persons who are from lower socioeconomic backgrounds are more likely to live in areas with poor air quality and are therefore disproportionately affected by poor air quality. Any perceived improvements in air quality will result in improved health outcomes and will have beneficial differential impact on this group.

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	Wigan		
	Accessibility	-	Not assessed for GM	Low	Disproportionate	Persons from a lower socioeconomic background are more likely to rely on public transport and taxis/PHVs. Any decrease in service would be likely to adversely impact this group.
	Affordability	-	Not assessed for GM	Medium	Differential	Any price rises from public transport or PHV/Taxi compliance that increase fares will differentially impact those persons from lower socioeconomic backgrounds.
Sexual orientation	Accessibility	-	Low	Low	Differential	Persons of certain sexual orientations have greater chances of experiencing hate crime and therefore for safety reasons may be more likely to take public transport or a taxi/PHV rather than walking. Therefore, any changes in accessibility or affordability would disproportionately impact this group. There is no comparison data for this protected characteristic.
Marriage & civil partnership	No equality impact					<b><i>This PC was scoped out of this assessment.</i></b>

## 2.3 'Hot-spots' in your Local Authority

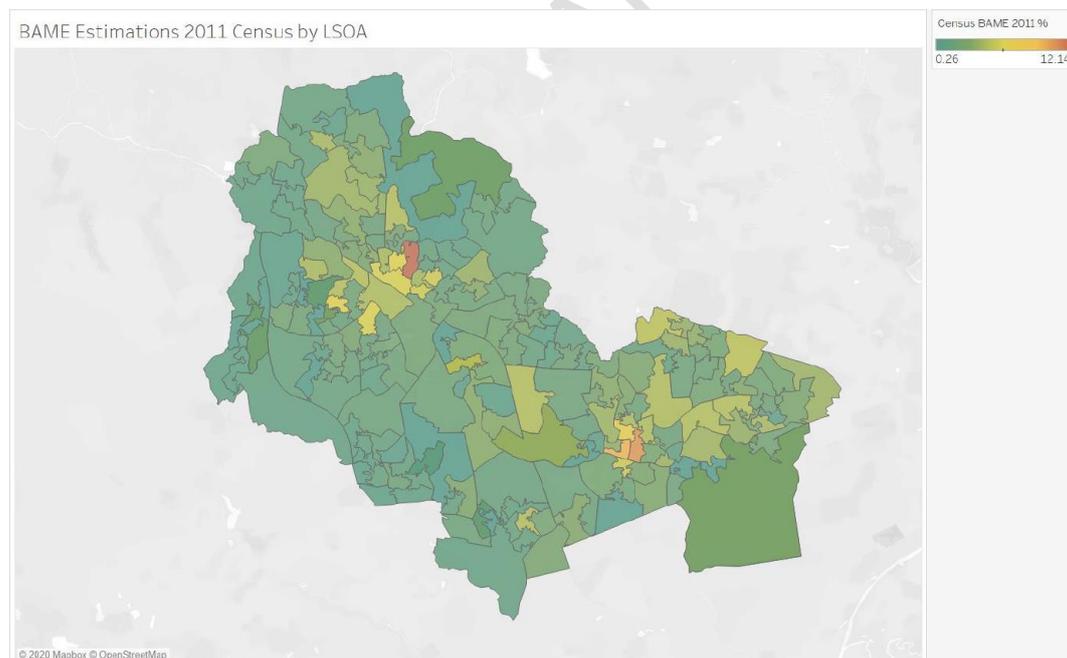
### 2.3.1 Geographical 'hot-spots' in Wigan

No geographical 'hot-spots' have been identified where particular equality impacts are evident.

### 2.3.2 Protected characteristic 'hot-spots' in Wigan

There are some outliers where the age characteristic of the population is markedly different from the average. Wigan also have a higher percentage of people limited by disability than the general GM population, specifically in LSOA outliers. The affordability and accessibility of taxis and buses needs to be closely monitored to ensure these outliers are not disproportionately impacted by changes to services.

Wigan has a number of outliers, where the population of black, Asian and minority ethnic groups are higher than the GM average. In those outliers which have a higher percentage of black, Asian and ethnic minority communities the impacts on accessibility and affordability will be greater.



There is one main outlier, LSOA E01006329, where the population made up of significantly more males than females. In terms of the impact on affordability it has been identified that males will be impacted more by the changes, due to their occupations as taxi, PHV, HGV and LGV drivers, therefore the cost of compliance will be disproportionately experienced by this group.

## **2.4 Actions to be taken by Wigan Council**

### **2.4.1 Mitigate any potential equality impacts identified.**

The impacts identified within the EqIA are similar in nature to the wider GM picture, except for slightly higher impacts on persons with a disability due to the higher number of people with a disability residing in Wigan.

People limited by disability will be disproportionately affected by any changes to the accessibility of transport, for example, buses, private hire vehicles, taxis and minibuses. The number affected in Wigan will be slightly greater than the overall proportion of people limited by disability in GM.

The 'sunset exemption' from charges of coaches and buses not on a registered route reflects the nature of the vehicles and the companies that run them and the impact on accessibility for vulnerable groups, often with protected characteristics, if provision of service is affected. This and the permanent exemption of Disabled Passenger and Disabled Tax Class vehicles along with Community minibuses, and temporary sunset exemptions of Wheelchair Accessible Taxis and PHVs will mitigate some of the impacts in relation to disabilities requiring wheelchairs, there are other disabilities which do not require wheelchair accessibility, and which would continue to be affected by any reduction in availability.

The Clean Taxi Fund and vehicle finance contributions available to the trade as well as 'try before you buy' initiatives. Close links with the taxi trade will ensure that the extent of the grants and finance will be effectively communicated to try and ensure the numbers of vehicles are not affected.

The Clean Bus Fund will be made available to partially meet the cost to retrofit buses to ensure they are compliant with the CAZ. Funding is also available through the Clean Commercial Vehicle Fund to support minibuses, coaches, HGVs and vans.

### **2.4.2 Monitor any potential equality impacts identified.**

The number of taxis and PHVs and/or overall hours worked should be monitored to identify if there is a fall in the number of available taxis.

Links should be made with taxi companies and local groups that represent people limited by disability to determine if issues have arisen with accessibility due to measures introduced by the CAZ.

Through contacts with TfGM, bus patronage should be monitored to determine any positive or negative impacts. This will need to be carefully assessed on previous years, due to the impact that Covid-19 had on public transport usage.

The engagement made with logistics sectors should be continued to monitor uptake of grant funds and the impacts on HGV/LGV fleet, especially those small businesses and self-employed drivers.

We will engage with the Council for Voluntary Service and the wider Voluntary Community and Social Enterprise (VCSE) sector who support disabled residents,

veterans, and carers to gauge the impact of the measures on these protected characteristics.

### **2.4.3 Review any potential equality impacts identified.**

Wigan have an Equality Action Plan for which progress is updated and reported to the senior management team on a quarterly basis. An action will be put in place to review the impact of the mitigations outlined in of the GM CAP and monitor and measure the effect on protected characteristic groups identified within the EqIA. Further actions can then be assessed if necessary.

### **2.4.4 Outline local monitoring and review plan.**

Wigan's Equality Action Plan will form the basis of the local monitoring and review plan. Actions will be reviewed quarterly to ensure the mitigation is effective and review the impact on protected groups. An annual update will be provided.

Wigan will also further engage with TfGM and the wider EqIA monitoring and review plan to feedback information and participate in future actions or mitigation.