



## **Title: Revision of the Air Quality Action Plan – Equality Impact Assessment**

### **Introduction**

Part IV of the Environment Act 1995 sets out statutory provisions on air quality. Section 82 provides that local authorities shall review the air quality within their area. Section 83 requires local authorities to designate Air Quality Management Areas (AQMAs) where air quality objectives are not being achieved, or are not likely to be achieved (i.e. where pollution levels exceed the air quality objectives) as set out in the Air Quality (England) Regulations 2000.

Where an area has been designated as an AQMA, section 84 requires local authorities to develop an Air Quality Action Plan (AQAP) setting out the remedial measures required to achieve the air quality standards for the area covered within the AQMA. Where air quality issues have been identified, it is recommended that a steering group is formed to include the main parties involved in developing either Action Plans or Air Quality Strategies.

The Department for Environment and Rural Affairs has recently provided new statutory guidance in the form of the Local Air Quality Management Policy Guidance (PG16). The guidance gives particular focus to so-called 'priority pollutants' such as Nitrogen Dioxide (NO<sub>2</sub>) and so-called 'Particulate Matter' (PM<sub>10</sub> and PM<sub>2.5</sub>) and is relevant to both district and county councils.

Exeter City Council is committed to reducing the exposure of people in Exeter to poor air quality in order to improve health. This Air Quality Action Plan (AQAP) outlines the Council's vision for air quality in the city. Many of the measures within the plan are still at an early stage of development, and detailed plans have yet to be finalised. When these detailed plans are brought forward, we will consider the demographic makeup of the populations affected by changes to existing transport arrangements. The population worst affected by the current poor air quality is small, being the occupants of those houses within the Air Quality Management Area. Analysis of this population is hindered by the small size of the group, which limits statistical analysis and could raise confidentiality concerns.

In the Air Quality Action Plan, we outline how Exeter City Council plans to tackle air quality issues within our control and with local partners. However, we recognise that there are a large number of air quality policy areas that are outside of the Council's direct influence (such as vehicle emissions standards agreed in Europe). We will continue to seek opportunities to lobby regional and central government on policies and issues beyond Exeter City Council's direct influence.

The Action Plan was the subject of a 3 month engagement process in early 2018. A summary of the outcomes of this engagement is included in the final Plan, including a breakdown of respondents by age and by identification as male or female. No analysis has yet been undertaken of whether there were significantly different responses to individual questions based upon these factors and the questionnaire did not ask whether respondents had a disability. Further information regarding specific measures in the plan can be gathered as the detailed plans emerge.

**Lead officer:** Simon Lane, Environmental Health and Licensing Manager

**Stakeholders:** Residents, Elected Members, Businesses, Visitors to the City, Public Health and Devon County Council

For each of the areas below, an assessment has been made on whether the policy has a **positive, negative or neutral impact**, and brief details of why this decision was made and notes of any mitigation are included. Where the impact is negative, a **high, medium or low assessment** is given. The assessment rates the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

**High impact** – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

**Medium impact** – some potential impact exists, some mitigating measures are in place, poor evidence

**Low impact** – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little discretion

Consideration	Neutral	Positive	Negative
<p><b>Target group / area</b>  <b>Race and ethnicity</b>  (including Gypsies and Travellers; migrant workers asylum seekers etc.)</p>	<p>There is no evidence to suggest that the action plan would have a potential impact on this characteristic.</p>		
<p><b>Disability</b>  (as defined by the Equality Act - a person has a disability if they have a physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities)</p>		<p>The Air Quality Action Plan applies equally to all residents of Exeter irrespective of disability.</p> <p>Some of the actions in the plan aim to improve pedestrian and cyclist access throughout the city. Improvements to highways and pavements are likely to improve the ability for those with physical disabilities to get around the city.</p> <p>People that have an existing heart and lung conditions (i.e.</p>	<p><b>MEDIUM</b> - Access restrictions for private cars could have a negative impact on those with limited mobility. As any such schemes are developed in detail, appropriate mitigation will be designed to ensure that suitable access is maintained for those with limited mobility.</p>
		<p>COPD, asthma) are more sensitive to air pollution leading to the need for additional medical care including hospitalisation. Measures in the Action Plan to improve local air quality should help these individuals.</p>	

Consideration	Neutral	Positive	Negative
<b>Gender</b>			<b>MEDIUM</b> - Women are often the main carers for elderly relatives and children. They may be more affected by access restrictions for private cars, particularly when making journeys for multiple purposes (eg school drop off and work). The potential from this to have a negative impact will be considered as any such schemes are developed in detail.
<b>Gender reassignment</b>	There is no evidence to suggest that the action plan would have a potential impact on this characteristic.		
<b>Religion and belief</b>	There is no evidence to suggest that the action plan would have a potential impact on this characteristic.		
<b>Sexual orientation</b> (including heterosexual, lesbian, gay, bisexual)	There is no evidence to suggest that the action plan would have a potential impact on this characteristic.		

Consideration	Neutral	Positive	Negative
<p><b>Age</b> (children and young people aged 0 – 24, adults aged 25 – 50, younger older people aged 51 – 75/80; older people 81+. The age categories are for illustration only as overriding consideration should be given to needs).</p>		<p>The people most likely to be affected by air pollution are those with asthma, lung disease, COPD or a cardiovascular disease. Those who are more susceptible to air pollution in certain life stages are unborn babies (pregnant women), children (some children are particularly vulnerable i.e. those with an underlying chronic lung condition and cystic fibrosis) and older adults. Taking this into consideration, if the Air Quality Action Plan was implemented it would have the greatest positive impact on children aged 0 – 16 and adults aged 65+ (which represent approximately 31% of Exeter’s population).</p>	
<p><b>Areas of deprivation</b></p>		<p>A positive impact has been identified as areas with high levels of air pollution also tend to be relatively deprived. This means that more deprived populations receive the greatest benefits.</p>	
<p><b>Human Rights</b></p>	<p>There is no evidence to suggest that the action plan would have a potential impact on this characteristic.</p>		
<p><b>Health and Wellbeing</b> (consider both the wider</p>		<p>A positive impact has been identified from the Air Quality</p>	

Consideration	Neutral	Positive	Negative
<p>determinants of health such as education, housing, employment, environment, crime and transport, as well as the possible impacts on lifestyles and the effect there may be on health and care services)</p>		<p>Action Plan as actions described in this report work to reduce the health impacts of poor local air quality.</p> <p>There is higher incidence amongst deprived populations of the types of diseases that are exacerbated by poor air quality. Thus the most vulnerable members of society are often worst affected by air pollution and will receive the greatest benefits from this plan.</p>	