

.As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality, diversity, cohesion and integration. In all appropriate instances we will need to carry out an equality, diversity, cohesion and integration impact assessment.

This form:

- can be used to prompt discussion when carrying out your impact assessment
- should be completed either during the assessment process or following completion of the assessment
- should include a brief explanation where a section is not applicable

| | |
|--|--|
| Directorate: Resources & Housing | Service area: Sustainable Energy & Air Quality (SEAQ) |
| Lead person: James Hulme | Contact number: 0113 3786996 |
| Date of the equality, diversity, cohesion and integration impact assessment: 12/06/2018 | |

| |
|--|
| 1. Title: Clean Air Zone – Phase Two |
| Is this a: |
| <input checked="" type="checkbox"/> Strategy /Policy <input type="checkbox"/> Service / Function <input type="checkbox"/> Other |
| If other, please specify |

2. Members of the assessment team:

| Name | Organisation | Role on assessment team e.g. service user, manager of service, specialist |
|---------------------|---------------------|--|
| Polly Cook | Leeds City Council | Executive Programme Manager |
| Andrew Hickford | Leeds City Council | Senior Project Manager |
| James Hulme | Leeds City Council | SEAQ lead on equality |
| Ania Campbell | Leeds City Council | SEAQ lead on consultation |
| Claire Dalton-Nobbs | Leeds City Council | SEAQ lead on HGVs |
| Daniel Gascoigne | Leeds City Council | SEAQ lead on stakeholder engagement |

3. Summary of strategy, policy, service or function that was assessed:

Leeds has been named as one of the cities in the UK that will not be compliant with nitrogen dioxide regulations by 2020, in line with EU air quality targets. As a result, Leeds City Council is required to implement a solution to achieve compliance with EU & National air quality targets within the shortest feasible timescale to deliver improvements to air quality in Leeds and to ensure that the city is compliant with national and international air quality targets.

In December 2017, Leeds proposed the implementation of a Clean Air Charging Zone (CAZ) Category B over a large geographical area (exec board report 2.8) to meet air quality national standards in the shortest possible timescales. This would require buses, coaches, HGVs, and taxi & private hire to comply with pre-determined emission standards or pay a fine upon entry to the zone. It was proposed that taxi & private hire vehicles be required to move to a cleaner vehicle than a Euro 6 diesel such as a petrol hybrid or electric to avoid a CAZ charge. The initial proposal was launched with an informal public consultation from January 2nd – March 2nd, generating 8,774 responses from the public and private sector. This proposal was accompanied with an Equality Impact Assessment Screening (Stage 1).

A full Equality Impact Assessment is now being completed (Stage 2) following the first public consultation to inform the revised CAZ proposal issued in June 2018. The public consultation responses were reviewed and multiple alternative scenarios modelled to determine impact on air quality. Showing that air quality could still be improved in the shortest possible timescales consistent with all other legal responsibilities, resulted in a reduced boundary charging CAZ B and development of multiple support packages to assist affected businesses and groups. Full information on the scope of this equality impact assessment can be found within June 2018's Executive Board report. The ambition of the reduced CAZ boundary and support packages is to ensure that impact on business and individuals is lessened, whilst improving air quality in the shortest possible timescale, consistent with all other legal responsibilities placed upon the Council.

A final full EIA will be completed in September 2018 (Stage 3) following a formal consultation on the reduced boundary CAZ, taking place between 28th June and 12th August 2018.

4. Scope of the equality, diversity, cohesion and integration impact assessment
(complete - 4a. if you are assessing a strategy, policy or plan and 4b. if you are assessing a service, function or event)

4a. Strategy, policy or plan
(please tick the appropriate box below)

| | |
|---|-------------------------------------|
| The vision and themes, objectives or outcomes | <input checked="" type="checkbox"/> |
|---|-------------------------------------|

| | |
|---|--------------------------|
| The vision and themes, objectives or outcomes and the supporting guidance | <input type="checkbox"/> |
| A specific section within the strategy, policy or plan | <input type="checkbox"/> |
| <p>Please provide detail:</p> <p>This EIA considers the revised CAZ proposal issued in June 2018 Executive Board. One of the key asks from businesses during the consultation process was to reconsider the boundary, especially around the key industrial areas of the city. As a result we remodelled the Clean Air Charging Zone with an amended boundary that used the M621 as the southern boundary and the A61 and A63 around the Enterprise Zone. After the model was reappraised it was concluded that the reduction in size could be adopted without significant adverse impact on the requisite outcomes. Air quality improvements will still be delivered in a wider area than just the clean air charging zone.</p> <p>The council has considered all the feedback put forward through the consultation and amended its draft CAZ proposal where appropriate. The reduced boundary CAZ B (see exec board, 3.13) will require non-compliant buses, coaches, HGVs and taxi & private hire vehicles to pay a charge after entering the zone. A full explanation of non-compliant vehicles can be found within LCC's Executive Board on Clean Air Zone – June 2018. The ambition of the Clean Air Zone is to ensure the city region is compliant with UK Air Quality Standards and EU Directive 2008/50/EU Limit Values and consequently provides improved public health outcomes for Leeds citizens in the shortest possible timescales. The boundary change, referred to as the 'reduced boundary', reduces total area covered from 129.7 sq. km to 88.6 sq. km. Maps of the proposed CAZ areas are included within the Executive Board report.</p> <p>Alongside the revised boundary, LCC has developed a series of support packages that incorporates some of the proposals and concerns raised from the informal consultation, as detailed in the Executive Board report. These support packages are proposed to reduce direct and indirect impacts on businesses and public. The support packages, including financial support, sunset periods, and exemptions have been developed to assist businesses in the transition to cleaner vehicles, and reduce the likelihood of unwanted secondary impacts on the public. Full details are provided within the Executive Board report.</p> | |

| | |
|--|--------------------------|
| <p>4b. Service, function, event please tick the appropriate box below</p> | |
| The whole service (including service provision and employment) | <input type="checkbox"/> |
| A specific part of the service | <input type="checkbox"/> |

| | |
|--|--------------------------|
| (including service provision or employment or a specific section of the service) | |
| Procuring of a service (by contract or grant) | <input type="checkbox"/> |
| Please provide detail: | |
| N/A | |

5. Fact finding – what do we already know
 Make a note here of all information you will be using to carry out this assessment. This could include: previous consultation, involvement, research, results from perception surveys, equality monitoring and customer/ staff feedback.

(priority should be given to equality, diversity, cohesion and integration related information)

Information sources used for this assessment include:

- Completed public informal consultation questionnaires on December 2017's Leeds CAZ proposal, with breakdown of equality information
- Analysis of questionnaire highlighting low response rates in various groups to understand where to focus the next stage of the consultation for a fairer representation of viewpoints, where possible.
- Letters and emails to LCC regarding impacts of the CAZ on individuals and/or businesses
- Analysis of economic impact by external consultant, on behalf of LCC
- Feedback from face-to-face meetings with numerous businesses, individuals, and stakeholder groups
- Revised Clean Air Zone boundary, charges and accompanying policy

Are there any gaps in equality and diversity information
Please provide detail:

The statistics, shared below, separate where we had more than adequate responses from certain groups and where we were unrepresented for particular groups. We have used ONS 2016 population estimates and Census 2011 data.

Over represented classification responses:

- Leeds has a population of 49.1% males but we received 61% responses from this group;
- 91% of consultation responses were from people with a 'white' ethnicity in the 2011 census we had a 85% respondents from this group;
- We have 22.8% of resident aged between 45- 64 but 40% of all responses were from those age group.

Under represented classification responses:

- 7% of consultation responses were from people with a disability this is not directly comparable with the census which asks if their day to day activity is limited because of health problem or a disability which has lasted 12 months or more. The data shows that

in Leeds 16.8% activity is limited in some way

- We received 5% of responses from the Asian category and we have 8% in the city and we also know a large proportion of Taxi/PH drivers belong to this group and they are impacted by the CAZ
- The written response rates from business was low, with only 8% of informal consultation responses being received from business. However, a number of face-to-face meetings were held with taxi & private hire drivers & operators, and HGV groups and trade associations. A considerable volume of emails from businesses/self-employed were responded to throughout the consultation regarding the CAZ.

Action required:

A second consultation will run from June 28th – August 12th on the revised CAZ proposal. The focus of this consultation will be on:

- The revised CAZ boundary
- Signage and cameras
- Charging and supporting policy
- Additional proposals to reduce air pollution in Leeds
- Support packages

Officers will ensure that groups less represented in the first consultation are targeted, with alternative routes of engagement introduced to increase response rates. Early consideration has been given to source appropriate representative organisations for multiple equality characteristics, and business groups underrepresented in the first consultation.

- Equality hubs – Providing information in accessible formats
- Disability groups
- T&PH – Use translated signposting of where to go to take part in the consultation events. Target information in key locations such as Taxi ranks, offices and community hubs
- HGVs –Using Operator licensing data provided by Office of Trade Commissioner, building on the relationships created in phase one and working closely with trade organisations
- Working with neighbouring authorities to advertise the consultation.

6. Wider involvement – have you involved groups of people who are most likely to be affected or interested

Yes

No

Please provide detail:

A comprehensive consultation process was undertaken from January to March 2018. During this period the following activities were undertaken:

- Over 70 different types of consultation events were held throughout the city, this included holding information booths, consulting with the directly impacted sectors, holding workshops etc.
- Direct mailshot via a postcard to every home within the city
- Promotion via variable signs, poster campaign, bus stops

- Focused work with trade organisations
- Widespread social media campaign
- Dedicated email address set up to respond to enquiries

As a result 8744 responses were received from the questionnaire alone. The consultation was analysed by an external consultant, MEL (Measurement Evaluation Learning).

There was overwhelming support that the council should take action to improve air quality in the shortest possible time, however a number of challenges and impacts were raised by affected groups. The Council has considered these and sought to resolve where possible in the revised CAZ, as detailed in 7, 8 & 9.

Action required:

The second consultation will seek to increase response rates from those groups underrepresented in the first consultation. SEAQ team have been developing multiple methods of engaging with affected businesses for HGVs, T&PH, buses and coach operators. Additional consultation activity will focus on engaging ancillary businesses that may be affected by the CAZ. We will also be casting the net wider and looking to encourage feedback from businesses, as well as taxi and private hire drivers/operatives outside the Leeds boundary.

7. Who may be affected by this activity?

please tick all relevant and significant equality characteristics, stakeholders and barriers that apply to your strategy, policy, service or function

Equality characteristics

- | | | |
|--|--|---|
| <input checked="" type="checkbox"/> Age | <input type="checkbox"/> Carers | <input checked="" type="checkbox"/> Disability |
| <input type="checkbox"/> Gender reassignment | <input checked="" type="checkbox"/> Race | <input type="checkbox"/> Religion or Belief |
| <input type="checkbox"/> Sex (male or female) | <input type="checkbox"/> Sexual orientation | |
| <input checked="" type="checkbox"/> Other | | |

(Other can include – marriage and civil partnership, pregnancy and maternity, and those areas that impact on or relate to equality: tackling poverty and improving health and well-being)

Please specify:

Health – CAZ will deliver improved air quality to all areas of Leeds. The most polluted areas are largely located in the most deprived areas of Leeds and the CAZ will be looking to improve air quality which will hopefully increase the health benefits.

Race – Taxi & private hire drivers are disproportionately represented by ethnic minorities compared to Leeds’ general population, meaning the CAZ will have a disproportionate impact on these groups.

Standard of living – improved living environment by improving air quality in residential areas

Access to employment – T&PH and HGV drivers can struggle with alternative employment opportunities due to lack of skills. The CAZ has potential to introduce barrier to finding/retaining employment

Poverty (wealth and income) – The charging CAZ may affect self-employed or SMEs located within or even outside the boundary (where they need to travel for business), where profit margins are low. Taxi and private hire drivers are most highly represented within both the lowest income decile of the population, and also are most highly represented in the lowest council tax band. This suggests that both their wages, and the value of their properties are some of the lowest in Leeds. Absorbing the costs of complying with the CAZ will result in further pressures on this group.

Stakeholders

- | | | | | | |
|-------------------------------------|-----------------------------|--------------------------|------------------|--------------------------|---------------------|
| <input checked="" type="checkbox"/> | Services users | <input type="checkbox"/> | Employees | <input type="checkbox"/> | Trade Unions |
| <input checked="" type="checkbox"/> | Partners | <input type="checkbox"/> | Members | <input type="checkbox"/> | Suppliers |
| <input type="checkbox"/> | Other please specify | | | | |

Potential barriers.

- | | | | |
|-------------------------------------|--|-------------------------------------|--|
| <input type="checkbox"/> | Built environment | <input checked="" type="checkbox"/> | Location of premises and services |
| <input checked="" type="checkbox"/> | Information and communication | <input type="checkbox"/> | Customer care |
| <input checked="" type="checkbox"/> | Timing | <input type="checkbox"/> | Stereotypes and assumptions |
| <input type="checkbox"/> | Cost | <input checked="" type="checkbox"/> | Consultation and involvement |
| <input checked="" type="checkbox"/> | Financial exclusion | <input checked="" type="checkbox"/> | Employment and training |
| <input checked="" type="checkbox"/> | specific barriers to the strategy, policy, services or function | | |

Please specify

8. Positive and negative impact

Think about what you are assessing (scope), the fact finding information, the potential positive and negative impact on equality characteristics, stakeholders and the effect of the barriers

8a. Positive impact:

Health

The introduction of a Clean Air Zone for Leeds will improve air quality directly within the CAZ, and have a secondary impact on areas outside the CAZ due to a cleaner mix of fleet travelling through and around Leeds resulting in a reduction in nitrogen oxides emitted. Short-term exposure (over hours or days) to elevated levels of air pollution can cause a range of effects including exacerbation of asthma, effects on lung function, increases in hospital admissions and mortality. Epidemiological studies have shown that long-term exposure (over several years) reduces life-expectancy, mainly due to increased risk of mortality from cardiovascular and respiratory causes and from lung cancer. Detailed modelling has taken place showing that NO₂ levels would be compliant within the CAZ by introducing a CAZ B using a revised boundary, with additional measures. All Air Quality Management Areas within the CAZ are modelled to achieve compliance with the air quality standard by 2020 as a result.

Standard of Living

The introduction of a Clean Air Zone for Leeds will improve air quality directly within the CAZ, and have a secondary impact on areas outside the CAZ due to vehicles emitting less nitrogen oxides to adhere to the CAZ standard. This will improve air quality in both residential and non-residential areas, improving standard of living for those who live and work in Leeds. Streets will become cleaner, more pleasant places to be, and potentially encourage people to take up active travel as mode of transport.

Reduced impact on business

Boundary change

One of the key asks from businesses during the consultation process was to reconsider the boundary, especially around the key industrial areas of the city. As a result we remodelled the Clean Air Charging Zone with an amended boundary that used the M621 as the southern boundary and the A61 and A63 around the Enterprise Zone. After the model was reappraised it was concluded that the reduction in size could be adopted without adverse impact on the requisite outcomes to improve air quality in the shortest possible timescales, consistent with all other legal responsibilities. Air quality improvements are still being delivered in a wider area than just the clean air charging zone

Revised charging structure

The below charging structure table details the progression from initial CAZ proposal to the revised proposal. Following responses to the consultation, LCC reconsidered multiple modelling scenarios and determined that air quality can be improved in the shortest possible timescales alongside reducing the charges proposed in the informal consultation.

| Vehicle class | Initial proposal (Dec 17) | Revised proposal (June 18) |
|---------------------------------|----------------------------------|--|
| Buses, Coaches and HGVs | £100/day | £50/ day |
| Taxis and Private Hire Vehicles | £12.50/day | £12.50/ day |
| Taxi and Private Hire Vehicles | N/a | £50/week (only available to Leeds' licensed drivers) |

The revised proposal will result in reduced costs for affected businesses with non-compliant vehicles. For taxi & private hire, it has been proposed to set a weekly charge for taxi and private hire vehicles that are licensed in Leeds as a key concern raised in the consultation was that many drivers use their vehicles for personal use and would still be charged. This was considered by the trade to be inequitable as the council was not implementing a charging zone for the private car. The weekly charge is the equivalent of 4 days charge per week and serves to recognise that local drivers do use their cars for personal travel as well as business use without creating an onerous administrative burden for either party.

Support packages – Taxi & Private Hire

Taxi & private hire drivers raised that they were subject to inequality of process as being required to use a cleaner standard of vehicle than the national Clean Air Zone Framework specified. As the sector are being asked to bring forward their normal vehicle replacement cycle, we are proposing a support package that will provide grant funding to cover the initial revenue costs of changing vehicles as well as access to an interest free loan. It is anticipated that a grant package of £1,500 will be made available for petrol hybrid vehicles, £2,000 for plug in hybrid vehicles and £3,000 for electric vehicles. In addition to this, zero interest loans of up to £10,000 are proposed to be offered to reduce the cost of purchasing a compliant vehicle. These drivers will then own vehicles that have an improved whole life costs due to reduced fuel costs. The Council recognises this group typically live in more deprived areas with lower income than the Leeds average, and is seeking to minimise the impact of the CAZ on these drivers.

Support packages – HGVs, coaches & buses

HGV, bus and coach operators have highlighted that the cost of Euro VI is prohibitive for them under normal business conditions; some have highlighted an inflated cost (up to threefold) for second hand Euro VI vehicles since announcements regarding CAZ implementation for a number of cities from 2020 were made. We understand from some of the sector that replacement Euro VI diesel HGVs are between £80,000-£120,000 with much higher costs quoted for more specialist vehicles. As a result, LCC has developed a support package to support upgrading eligible HGVs based within the CAZ B boundary to Euro VI with a retrofit solution through the issuing of a grant in the region of £15,000 per vehicle. This support package will be targeted at Small-Medium Enterprises to ensure that those businesses requiring support receive it. Research has shown that large businesses operating HGV fleets typically have high rates of compliance with CAZ standards.

Secondary impacts on public

Increased fares and/or reduction of services

A number of concerns were raised through the informal consultation that members of the public would be exposed to increase fares from taxi & private hire due to passing on the costs of the CAZ. The support packages outlined above are intended to support T&PH to

transition to cleaner vehicles with financial support to ensure that costs can be absorbed by the trade without increasing fares or reducing services. The Council is fully aware that a number of vulnerable groups such as elderly, disabled, and deprived families use taxi & private hire vehicles to move around Leeds, and is seeking to ensure that the trade will not increase fares and have a financial impact on these groups.

Wheelchair accessible taxi & private hire vehicles will be exempt from CAZ charges, ensuring that vulnerable users of this service are unaffected by CAZ plans.

Minibuses

Minibuses are not included within Leeds' CAZ unless licensed as a taxi and private hire vehicle. This ensures that minibuses used by community groups, schools and so on will be able to continue their valuable role in society without introducing additional costs to these services.

School Coaches/ Buses

The Headteacher's forum raised concerns about the impact on equality of access to extra curriculum activities if there was a financial impact on the bus and coach companies serving schools. This concern was echoed by the school, and coach and non-scheduled bus operators have raised concerns about the impact of the CAZ on the viability of some services for schools trips as they would pass the cost of daily charges onto customers. In light of this, and given that the contribution to emissions from such vehicles is very modest, we have proposed to exempt eligible school related services so as to ensure no additional disadvantage for children and young people. This exemption will not make a difference to the date of securing compliance.

Action required:

The formal consultation running from June 28th – August 12th will consult on the aforementioned revised charging structure and support packages, and the opinions of individuals and businesses on how these will reduce the impact of the CAZ. This data will be analysed and incorporated into the final CAZ proposal in September 2018.

8b. Negative impact:

A range of negative impacts of the CAZ were raised in the informal consultation. These have been countered by support packages, exemptions and sunset periods to ensure that both direct and indirect impacts of the CAZ are minimised.

Businesses operating, or dependent on, non-compliant vehicles that operate within the CAZ will face a daily charge, or have to upgrade the vehicle. For some businesses, these costs will have a significant impact on ability to operate. As a result, Leeds is looking to introduce a series of support packages, exemptions and sunset periods for affected businesses to mitigate economic impact on businesses and resulting impacts on employment, stress, and standard of living.

There will be businesses within the CAZ boundary that will be directly impacted, either through customers choosing to go elsewhere as their vehicles are non-compliant or suppliers increasing their delivery costs. An example of this could be a builder's merchant or a garage that services HGVs.

The council will look to request a support package from government to help mitigate this

impact in the short term through potential business rate relief or support with relocation in more extreme cases.

Action required:

The formal consultation running from June 28th – August 12th will consult on the aforementioned revised charging structure and support packages, and the opinions of individuals and businesses on how these will reduce the impact of the CAZ. This data will be analysed and incorporated into the final CAZ proposal in September 2018.

9. Will this activity promote strong and positive relationships between the groups/communities identified?

Yes No

Please provide detail:

Action required:
None

10. Does this activity bring groups/communities into increased contact with each other? (e.g. in schools, neighbourhood, workplace)

Yes No

Please provide detail:

The introduction of a CAZ will not bring groups/communities into increased contact with each other.

Action required:
None

11. Could this activity be perceived as benefiting one group at the expense of another? (e.g. where your activity/decision is aimed at adults could it have an impact on children and young people)

Yes

No

Please provide detail:

The introduction of a Clean Air Zone will improve the health of those who live and work in Leeds. To achieve this, it is proposed that non-compliant buses, coaches, HGVs and taxi & private hire vehicles would be charged to enter the zone. The informal consultation revealed that some businesses deemed this to be improving health at the expense of those businesses and self-employed individuals that would have to absorb the CAZ charges and/or costs to upgrade vehicles.

Leeds City Council is seeking to reduce the impact on affected groups by delivering support packages, exemptions and sunset periods. However, it is essential that nitrogen dioxide emissions are reduced in Leeds in the shortest time consistent with other legal responsibilities, in order to improve health, which is being prioritised over the impacts on businesses.

Action required:

The formal consultation running from June 28th – August 12th will consult on the aforementioned revised charging structure and support packages, and the opinions of individuals and businesses on how these will reduce the impact of the CAZ. This data will be analysed and incorporated into the final CAZ proposal in September 2018.

12. Equality, diversity, cohesion and integration action plan

(insert all your actions from your assessment here, set timescales, measures and identify a lead person for each action)

| Action | Timescale | Measure | Lead person |
|---|------------------|----------------|--------------------|
| Action plan will be completed for final CAZ EIA in September 2018 | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

| Action | Timescale | Measure | Lead person |
|---------------|------------------|----------------|--------------------|
| | | | |

13. Governance, ownership and approval

State here who has approved the actions and outcomes from the equality, diversity, cohesion and integration impact assessment

| Name | Job Title | Date |
|---|-----------|------|
| | | |
| Date impact assessment completed | | |

14. Monitoring progress for equality, diversity, cohesion and integration actions (please tick)

- As part of Service Planning performance monitoring
- As part of Project monitoring
- Update report will be agreed and provided to the appropriate board
Please specify which board – Executive Board September 2018
- Other (please specify)

15. Publishing

Though **all** key decisions are required to give due regard to equality the council **only** publishes those related to **Executive Board, Full Council, Key Delegated Decisions** or a **Significant Operational Decision**.

A copy of this equality impact assessment should be attached as an appendix to the decision making report:

- Governance Services will publish those relating to Executive Board and Full Council.
- The appropriate directorate will publish those relating to Delegated Decisions and Significant Operational Decisions.
- A copy of all other equality impact assessments that are not to be published should be sent to equalityteam@leeds.gov.uk for record.

Complete the appropriate section below with the date the report and attached assessment was sent:

| | |
|--|---------------------|
| For Executive Board or Full Council – sent to Governance Services | Date sent: 15/06/18 |
| For Delegated Decisions or Significant Operational Decisions – sent to appropriate Directorate | Date sent: |
| All other decisions – sent to equalityteam@leeds.gov.uk | Date sent: |