

Appendix 2

Directorate: Resources & Housing	Service area: Sustainable Energy & Air Quality (SEAQ)
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Date of the equality, diversity, cohesion and integration impact assessment: 27/08/2019	
Refreshed 10/09/2020	
1. Title: Clean Air Zone – Final submission	
Is this a:	
<input checked="" type="checkbox"/> Strategy /Policy	<input type="checkbox"/> Service / Function
	<input type="checkbox"/> Other
If other, please specify	
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 type="checkbox"/> Location of premises and services
<input checked="" type="checkbox"/> Information & 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 type="checkbox"/> Employment and training
<input type="checkbox"/> specific barriers to the strategy, policy, services or function	
Please specify	

This document is a supporting document of the Executive Board report titled Improving 'Air Quality in the City – CAZ update' published in September 2019. The Council submitted Executive Board reports in December 2017, June 2018 and November 2018 which were each accompanied by Equality Impact Assessments (EIA). This final EDCI is supplementary to previous EIAs, it addresses the impact of the cancellation of the CAZ scheme only.

As detailed in the main accompanying report to Executive Board (21 October 2020) regarding Improving Air Quality in the City (Clean Air Charging Zone (CAZ) update) there has been a fundamental change in the approach required by LCC to improving Air Quality (AQ) in the city. Relevant sections of this associated EIA have been updated to reflect this new position.

In light of these changes elements of this EIA focusses narrowly on:

- Background
- Consultation with possible impacted groups
- Race
- Economic disadvantage

The changes to the future of AQ improvements in Leeds have no impact of the remaining sections of the previously submitted EIA (1, 3, 4, 5, 6, 8, 9, 10 & 12) however when a future report detailing the new Air Quality Strategy 2021 – 2030 is brought to the Executive in due course all aspects of EIA requirements will be updated as required.

1. What we assessed

Background

Leeds was named as one of the cities in the UK that will not be compliant with the mean annual average emission levels of nitrogen dioxide (NO₂) required by regulations by 2020, in line with EU air quality minimum requirements. As a result, Leeds City Council was required to implement a solution to achieve compliance with EU & National air quality targets within the shortest possible timescale to deliver improvements to air quality in Leeds, consistent with other legal responsibilities. Whilst the need to achieve compliance is a legal requirement, Leeds recognise and are committed to improving the health and wellbeing of everyone in the city and taking appropriate steps to reduce pollution improves air quality and benefits us all.

A benefit of the CAZ fleet upgrade is the improvement public health by addressing the issue of air quality in the city. Both long- and short-term exposure to air pollution are known to adversely affect health. Short-term exposure (over hours or days) to elevated levels of air pollution can cause a range of negative 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.¹

Exposure to air pollutants has been linked to adverse health effects. On average air pollution reduces life expectancy of every resident in the UK by 7-8 months². Public Health England modelled that 29,000 deaths and 307,000 lost life years³ are attributed to annually to Particulate Matter (PM)_{2.5} and NO₂⁴. In Leeds PM is not a factor in terms of non-compliance, we already meet the requirements standards and are close to meeting the higher standard set by the World Health Organisation (WHO) for PM_{2.5}; the focus for Leeds is NO₂ reductions. However, improvement beyond compliance will continue to deliver further health benefits.

In September 2018, Leeds proposed the implementation of a Clean Air Charging Zone (CAZ) Category B across a part of the city's geographical area to meet air quality national standards in the shortest possible timescales and improve the air quality for the whole city. This option would require buses, coaches, Heavy Goods Vehicles (HGVs), and taxi/private hire (T/PH) vehicles to comply with pre-determined emission standards or pay a daily charge if they travel in the zone. The final CAZ proposal was approved by Executive Board on 18 October 2018.

On 21 November 2018 the Council approved the making of the Leeds Clean Air Zone Charging Order (adopted on 19th December 2018), with an accompanying EDCI impact assessment. Since this date, a number of policy changes have arisen which are reflected in the content of this EDCI assessment. On 11 December 2018 the Council submitted its Full Business Case to Government for the Leeds Clean Air Charging Zone which was subsequently approved on 18 January 2019 with £29 million funding awarded in total.

The latest report to the Executive confirms the outcome of the CAZ review and confirms the scheme is no longer going ahead as the aims of the CAZ (and therefore the associated benefits) have been achieved.

2. Consultation with possible impacted groups

Since the pandemic started in March 2020, and the subsequent CAZ review communications have been issued direct via email to all applicants and recipients of CAZ financial support packages so they were clear about any announcements and how it related to their own financial support award or application for support. Further messages have also been issued to the wider generic audience through media channels and the LCC website in August 2020.

¹ National Institute for Health and Care Excellence (NICE) - Expert testimony from Public Health England to inform NICE 'Air pollution: outdoor air quality and health' guideline 2017 <https://www.nice.org.uk/guidance/ng70>

² H. Brunt, et al – Air pollution, deprivation and health: understanding the relationships to add value to local air quality management policy and practice in Wales, UK, 2016

³ Public Health England - Estimating Local Mortality Burdens associated with Particulate Air Pollution, 2014

⁴ Particulate Matter and Nitrogen dioxide

These lines of Communication will be maintained and further updates issued including the outcome of the October Executive Board to all sectors as well as how further financial assistance can be accessed.

Comments and feedback previously received from the sector has also been taken into account in the development of ongoing economic support for example the inclusion grants for Wheelchair Accessible Vehicles (WAVs) from the Taxi & Private Hire (TPH) fleet to apply for funding.

3. Race

Data has been available in the public domain for some time about the significant additional impact on the Black, African and Minority Ethnic groups (BAME) in respect of COVID-19; with individuals of BAME heritage and background being more seriously affected in terms of number of hospitalisations and increased mortality rates.

It is also known that BAME groups are represented in higher proportions amongst the taxi and private hire (TPH) workforce.

With so many cleaner vehicles on the road (as highlighted in the accompanying report to the Executive) TPH drivers will benefit whether they live or just work in the city by being exposed to fewer air and traffic pollutants in their everyday lives.

So the steps taken to date, as well as future plans, to maintain the improvements in air quality ensures that any additional COVID-19 risk for the BAME community is not further compounded by breathing poor quality air associated with traffic emissions.

There has also been further work to lessen the financial burden on individuals who also work as TPH drivers who have received loans from LCC or had grant applications in process have been a key consideration throughout recent months and is highlighted further in section 11.

Overall the impact on Race of the Clean Air Zone preparation has had a positive impact on communities, as they now breathe cleaner air than when this EIA was first prepared. This positive benefit of improved air quality is expected to continue into the future so also helps mitigates other negative impacts, rather than compounding the affect, such as contracting COVID-19.

When it comes to race we know that poor air quality has an impact on some of the health conditions that are more prevalent in minority ethnic groups. When we last collected equality data from the T/PH drivers as part of the licensing process we had 55% of the forms that had ethnicity data completed and it showed that 69% of drivers had identified themselves as British Pakistani/Kashmiri.

4. Economic disadvantage

The demographics of the TPH workforce suggests that while a higher proportion are from BAME communities who also predominantly live in areas of economic disadvantage in the city.

Extensive work was undertaken through the submission of the business case, submitted to government in late 2018, to mitigate any further negative economic impact through CAZ planning and implement for these communities.

As the main Executive Board (October 2020) report highlights fleet upgrade in the city has exceeded expectations of the CAZ for Leeds. This shows a positive impact on the city's economic prosperity; as increased fleet churn with earlier than expected upgrades being made to the key fleets of TPH, HGVs and buses and coaches shows that individuals and companies have funds to invest in making these changes.

The latest figures show that more than 90% of buses and 80% of heavy goods vehicles now use cleaner Euro VI engines—a huge increase from the 3% of buses and 20% of HGVs that did so in 2016.

Ultra-low emission vehicles (electric, hybrid, hydrogen or liquid petroleum gas) are also surging in popularity among Leeds residents and businesses, having increased ten-fold since the start of 2016.

More than 2,300 of the city's licensed taxi and private hire cars are now ultra-low emission—up from around 1,000 in January 2019.

This means that anyone who lives or works in Leeds including those who drive for a living is now breathing considerably cleaner air than two years ago as a result of the improvements to the city's fleet and the other air quality measures delivered in support of cleaner air. Leeds now sits comfortably below legal compliance for NO₂ which is defined at 40 microgram/m³ in national legislation.

Leeds has seen some impact from the Covid-19 lockdown with air quality benefits associated with reduced traffic flows however it should be noted that the modelling of the cities legal compliance does not include these reduced traffic flows; rather the modelling has assumed traffic flows returning to normal levels to ensure the review is robust even this position places levels well below 40 microgram/m³.

Leeds continues to benefit from the reduced traffic flows and the associated air quality improvements as there are no current indications of returns to pre-lockdown levels even though businesses are up and running again post lockdown.

In March 2020 the decision was taken to suspend the TPH loan scheme. It immediately became apparent as lockdown was entered nationally that many business especially the TPH sector would be unable to operate during the lockdown period and this would have far reaching impacts on their income and as such render responsible lending decisions by LCC impossible to reach regarding loan affordability. Ceasing approval and payment of any further loans ensured that there was not an increased financial burden or level of indebtedness for TPH drivers in this group.

A repayment holiday was also immediately implemented for all recipients of the loans to date, this was initially for 3 months but was extended and in total covered the period April-November so no payments were claimed or required for a period of 8 months.

The opportunity to make voluntary contributions of any value was offered for those who may have their income less impacted e.g. those with NHS contracts that they still fulfilled. Direct debit payments will be recommenced on 1st December 2020, and assistance through Sundry Debtors has been offered for anyone in financial difficulty.

Throughout lockdown the rate of fleet upgrade as seen through grant applications did slow but didn't stop.

During this period new TPH grant applications continued to be accepted and processed with Government issuing a caveat that only upgrades made prior to 26th June 2020 should be considered as eligible for funding to allow for the review in to the CAZ to proceed.

Throughout lockdown TPH offices and garages were closed and all officers working remotely, gradual reopening of face to face operations and vehicle inspections recommenced in early July but still remain at a reduced level compared to pre-lockdown capacity. Throughout this period additional discretion and support was utilised by LCC in the processing of grant applications and applications were processed without the conditions of new vehicles being licensed as with TPHL offices being closed some elements of checks could not be completed within normal timescales.

Grant applications already received and in process for the Large Vehicle Grant Scheme were also still processed and paid in line with eligibility. Almost all of the HGV and non-schedule bus and coach sector have been impacted throughout the pandemic although some are seeing swifter recovery than others.

For example any operator with links to holidays, hospitality, entertainment and the events industry have seen and continue to see significant limitations on their income and expect opportunity for little or no work to remain in the months to come due to restrictions on numbers that can congregate and social distancing requirements.

As part of the mitigation and CAZ exit strategy, negotiations with Central Government are underway to retain some of the CAF money and continue to make funds available through provision of financial support packages to impacted sectors for whom, while there is no longer an CAZ imperative to upgrade, are seeking to make vehicle upgrades in the interests of public health and improving our city.

We have seen, that despite the impact of COVID-19 on individuals and businesses, many are extremely committed to making further vehicle upgrades. They show financial planning which suggests economic growth and the investment of their own funds to facilitate this. Although it should be noted that many see the provision of CAF assistance in the form of grants, combined with their own resources, as vital to achieving making further fleet upgrades.

Planned initiatives include;

- equivalent of two years free Taxi and Private Hire Licencing for those who upgraded following the original CAZ announcement
- continued support for upgrades for HGVs, NSB&C, & TPH
- grants available to be extended further to benefit TPH vehicles which are Wheelchair Accessible Vehicles (WAVs)

These schemes are subject to confirmation by Government.

For any recipient in receipt of funds that they have not yet spent in upgrading to compliant vehicles direct contact has been made with them about their options including the opportunity to return the funds.

Following provision of the loan repayment holiday the term of the loans will be extended by the same period so repayable over a period of 56 months rather than 48 for those loans paid pre-lockdown. The necessary notice to accompany loan agreements will be issued direct to loan recipients.

Overall there have been extensive measures to support the impacted sectors which shows mitigation against any negative CAZ economic impact. The prosperity of the cities individuals and businesses to utilise their own funds and access financial support to up to grade vehicles has supported improvements in the air quality realising health benefits for all.