

## EQUALITY IMPACT ASSESSMENT

The Equality Act 2010 requires all public bodies, including local authorities, to show “due regard” to the impact their policies and procedures have on people from different groups. This includes gender, race, religion, age, disability, sexual orientation and sexual identity. We also have a responsibility to foster good community relations. Although they are not a legal requirement, conducting a basic assessment will allow you to look at the possible implications of a policy or procedure, and take any mitigating action if appropriate.

Remember:

- Equality Impact Assessments (EIAs) should be carried out on **relevant** policies and procedures. Not all policies or procedures will require them. If you are unsure if one is required, please contact the Equality and Diversity Manager on 01753 875069 for advice.
- Assess any potential impacts, positive and negative, in a proportionate way and with relevance
- Make decisions that are justified, evidenced, relevant and identify any mitigating proposals
- Prioritise expenditure in an efficient and fair way
- Have a record showing that the potential impacts have been considered and that decisions are based on evidence

It is important the EIA is carried out at the earliest opportunity to ensure that you have the time to undertake any additional work that will inform your decisions, for example community engagement.

When you have completed an EIA please send it to [Equalities@slough.gov.uk](mailto:Equalities@slough.gov.uk). If this EIA is part of a Committee Report please also send to [Joannah.Ashton@slough.gov.uk](mailto:Joannah.Ashton@slough.gov.uk) in Democratic Services.

**If you have any questions or concerns, please contact the Equality and Diversity Manager on 01753 875069.**

# Equality Impact Assessment

<b>Directorate:</b> Regeneration	
<b>Service:</b> Planning and Transport	
<b>Name of Officer/s completing assessment:</b> Jason Newman, Environmental Quality Team Manager	
<b>Date of Assessment:</b> 31 <sup>st</sup> August 2018	
<b>Name of service/function or policy being assessed:</b> Slough Low Emission Strategy (LES) 2018 - 2025	
1.	<p>What are the aims, objectives, outcomes, purpose of the policy, service change, function that you are assessing?</p> <p>The Slough Low Emission Strategy (LES) 2018-25 forms part of the Slough Air Quality Action Plan (AQAP). The purpose of the strategy is to reduce road transport vehicle emissions and improve air quality and the health impacts on the residents of Slough. It is a Statutory requirement under the Environment Act 1995 to prepare an AQAP whenever an Air Quality Management Area (AQMA) is designated. SBC has designated five AQMA in locations where annual mean levels of Nitrogen Dioxide (NO<sub>2</sub>) exceed the Government Air Quality Objective (AQO).</p> <p>There are over 2,000 properties within Slough that are in AQMA.</p> <p>The Government estimates that 23,000 deaths per annum in the UK are due to elevated NO<sub>2</sub> concentrations (2013) with an annual social cost of £13.5bn.</p> <p>Although levels of particulate matter (PM) in Slough do not breach the Government's AQO, Public Health England (PHE) estimated that 47 deaths in Slough in 2016 were attributable to levels of fine particulates (PM<sub>2.5</sub>), also causing an associated 559 life years lost. Slough has one of the highest levels of attributable deaths due to PM<sub>2.5</sub> levels in the South East of England.</p> <p>While there are several sources of NO<sub>2</sub>, emissions from road transport vehicles are by far the most significant source and are also a significant source of PM emissions.</p> <p>The Aims of the LES are to:</p> <ul style="list-style-type: none"> <li>- Improve air quality and health outcomes across Slough by reducing vehicle emissions through the accelerated uptake of cleaner fuels and technologies</li> <li>- Embed an innovative approach to vehicle emission reduction through integrated policy implementation</li> </ul>

- Provide a platform for inward investment as part of the transition to a low emission economy

The LES Objectives are outlined in the table below:

<b>Objectives</b>
<b>1 General</b>
1a Ensure all relevant Council strategies consider and support measures to improve air quality and health outcomes in partnership with stakeholders
<b>2 Evidence for Change</b>
2a Provide a robust framework for monitoring and modelling air quality across Slough
2b Use national and local data to assess the impact on health of Slough residents arising from air pollution
2c Work with local health professionals to promote awareness of the impact of vehicle emissions on health
<b>3 Creating a Low Emission Future: Leading by Example</b>
3a Provide measures to improve vehicle emissions through the Transport Strategy and Local Transport Plans
3b Provide policies to support improvements in air quality through the Local Plan
3c Develop air quality and planning guidance to promote air quality mitigation at design stage and support wider air quality improvements through off-set mitigation
3d Introduce specifications for electric vehicle charging as part of new development schemes
3e Implement vehicle emission standards through Social Value procurement practices
3f Consider whole life costs and alternatives to diesel in SBC vehicle fleet procurements
3g Introduce Clean Air Taxi emission standards and infrastructure to support the take-up of ultra-low emission taxis
3h Implement the Fleet Challenge to reduce emissions from the SBC 'grey fleet'
<b>4 Slough Clean Air Zone (CAZ) Framework</b>
4a Look at the feasible implementation of a Borough-wide Clean Air Zone (CAZ) including emission standards for buses, taxis, lorries and vans, in line with National Air Quality Plans
4b Implement measures to support the take-up of ultra-low emission vehicles (ULEV) through the development of a Slough Electric Vehicle Plan
4c Work in partnership with bus and freight operators to reduce emissions
4d Work in partnership with Highways England to reduce the impact of vehicles on the Strategic Road Network (M4)
4e Ensure Heathrow Airport expansion does not impact on pollution levels but help us realise the potential benefits of this opportunity to improve air quality in Slough

	<p>4e Prepare a Low Emission Programme to deliver measures within the LES</p> <p><b>5 Communication and Delivery Plan</b></p> <p>5a Produce an integrated communications and delivery plan for measures in the LES</p>
<p>2.</p>	<p>Who implements or delivers the policy, service or function? State if this is undertaken by more than one team, service, and department including any external partners.</p> <p>The development and delivery of the Slough Low Emission Strategy (LES) is managed by Jason Newman, Environmental Quality Team Manager. The LES covers policies and measures that have been, are being or will be delivered by several services and departments, including:</p> <ul style="list-style-type: none"> <li>• Transport Policy &amp; Management</li> <li>• Public Health</li> <li>• Taxi Licensing</li> <li>• Planning Policy &amp; Development Management</li> <li>• Fleet Management</li> <li>• Procurement Policy</li> </ul> <p>The LES recognises that SBC cannot improve air quality alone and includes initiatives that will require engagement and partnership working with external stakeholders, including bus and freight operators, SEGRO, NHS, major businesses, taxi operators, Network Rail, Heathrow Airport Ltd, Highways England, community groups, private sector investors and others.</p>
<p>3.</p>	<p>Who will be affected by this proposal? For example, who are the external/internal customers, communities, partners, stakeholders, the workforce etc. Please consider all of the Protected Characteristics listed (more information is available in the background information). Bear in mind that people affected by the proposals may well have more than one protected characteristic.</p> <p>The Slough Low Emission Strategy (LES) will have an overwhelmingly positive impact on all the residents of Slough as it seeks to improve air quality and reduce the health impacts of air pollution on the local population.</p> <p>It is important to state that a wide body of research, including Government Reports, have shown that air pollution negatively affects deprived and ethnic minority communities disproportionately. This is partly due to the concentration of deprived and ethnic minority</p>

communities in urban areas where pollution is most severe. It is also a factor that deprived communities tend to live near to heavily trafficked roads and near industrial areas where housing costs are lower.

No one is immune to the impacts of air pollution. The World Health Organisation classifies diesel exhaust fumes as carcinogenic and all residents of Slough will be exposed at some point in their daily lives. However, certain groups have been identified which are particularly susceptible to poor air quality. With respect to the list below, details are provided of the established medical effects of air pollution (\* denotes where these health impacts can be quantified at a local level).

**Age:** Children are significantly affected by poor air quality, from the womb through early childhood. Cognitive ability and neurological development are inhibited, lung development and function are inhibited, permanently affecting lung capacity and there is causal effect for asthma development, including increased hospital admissions\*

The elderly are particularly vulnerable to air pollution, especially for those who suffer from pre-existing conditions such as cardiovascular and respiratory diseases. PHE estimated that in 2016 there were 47 attributable deaths and 559 life years lost in Slough due to concentrations of PM2.5\*

**Disability:** People with existing cardiovascular and respiratory disease are particularly vulnerable to air pollution\*

**Gender Reassignment:** No specific vulnerability to air pollution beyond effects on general population

**Marriage and Civil Partnership:** No specific vulnerability to air pollution beyond effects on general population

**Pregnancy and maternity:** Studies show that pregnant mothers who live near to heavily trafficked roads have a significantly increased likelihood of having low birth weight babies (less than 2500g)\*. This leads to a variety of medical issues including impaired lung and neurological development.

**Race:** Studies show that, in association with deprivation, ethnic minorities are disproportionately affected by poor air quality\*

**Religion and Belief:** No specific vulnerability to air pollution beyond correlations with ethnicity

**Sex:** No specific vulnerability to air pollution beyond issues highlighted for pregnancy and maternity.

**Sexual orientation:** No specific vulnerability to air pollution beyond effects on general population

**Other:** Air pollution negatively affects deprived communities disproportionately – see above

4.	<p>What are any likely positive impacts for the group/s identified in (3) above? You may wish to refer to the Equalities Duties detailed in the background information.</p> <p>There are over 2,000 properties in Slough that lie within Air Quality Management Areas (AQMA) designated for elevated levels of NO2. While we do not have any AQMA for particulate matter (PM), all medical evidence shows that by reducing concentrations of PM we will significantly improve the health of our resident.</p> <p><b>Age:</b> Improvements in lung development, capacity and function in children. Improved cognitive ability and neurological development. Reduction in hospital admissions for asthma.</p> <p>Increased life expectancy for elderly people, particularly for those suffering from pre-existing conditions such as cardiovascular and respiratory diseases.</p> <p><b>Disability:</b> Improvements in health for those suffering from asthma and cardiovascular and respiratory disease  <b>Gender Reassignment:</b> Improvements in health, in line with effects on general population  <b>Marriage and Civil Partnership:</b> Improvements in health, in line with effects on general population  <b>Pregnancy and maternity:</b> Reduction in number of low birth weight babies  <b>Race:</b> In association with deprivation, expected improvements in health and life expectancy  <b>Religion and Belief:</b> Improvements in health, in line with effects on general population  <b>Sex:</b> Improvements in health, in line with effects on general population  <b>Sexual orientation:</b> Improvements in health, in line with effects on general population  <b>Other:</b> Significant improvements in health and well-being among deprived communities</p>
5.	<p>What are the likely negative impacts for the group/s identified in (3) above? If so then are any particular groups affected more than others and why?</p> <p>The LES focuses mainly on positive and proactive interventions designed to reduce air pollution. SBC and its partners are taking an “exemplar” role in changing travel patterns and incentivising initiatives that improve air quality. However, some elements of the Strategy, may have policy change or sanctions that could potentially adversely affect some groups. Specifically these are the Clean Air Zones (Charging) and changes to Taxi Licensing provisions. There are currently no charging Clean Air Zones at present and the council will conduct thorough impact and feasibility studies before any are implemented. There are no plans to include passenger vehicles.</p>

	<p>The changes to taxi licensing conditions have been subject to extensive consultation with the trade and proposals have been amended and timescales revised to address concerns that have been raised. The council is committed to incentivising lower emission vehicles as much as possible and working with the trade to improve air quality and emissions. Final proposals will be subject to an EIA.</p>
6.	<p>Have the impacts identified in (4) and (5) above been assessed using up to date and reliable evidence and data? Please state evidence sources and conclusions drawn (e.g. survey results, customer complaints, monitoring data etc).</p> <p>The Slough Low Emission Strategy has been guided and informed by the SBC Public Health Team, including the latest statistics on air pollution and health provided by Public Health England (PHE) and the Public Health Outcomes Framework, and the work of the Government Committee on the Medical Effects of Air Pollution (COMEAP)</p> <p>Studies show that the adverse health effects from short and long-term exposure to air pollution include:</p> <ul style="list-style-type: none"> <li>• Fraction of mortality due to particulate pollution<sup>1</sup></li> <li>• Increase in deaths from cardiovascular and respiratory diseases (COMEAP)<sup>2</sup></li> <li>• Increase in coronary events, including myocardial infarction and ischaemic heart disease<sup>3</sup></li> <li>• Increase in low birth weight babies (&lt;2500g)<sup>4</sup></li> <li>• Increase in childhood asthma development and wheeze<sup>5</sup></li> <li>• Inhibits neurological development in children<sup>6</sup> (it is thought that particulates pass through the olfactory system into the brain where they prevent normal synapse development)</li> <li>• Inhibits lung function in children, permanently affecting lung capacity<sup>7</sup></li> <li>• World Health Organisation (WHO) classifies diesel exhaust emissions as carcinogenic to humans with evidence linking air pollution with a range of cancers<sup>8</sup> (lung and bladder in particular).</li> </ul>

<sup>1</sup> <https://fingertips.phe.org.uk/profile/public-health-outcomes-framework/data#page/10/gid/1000043/pat/6/par/E12000008/ati/102/are/E06000039/iid/90362/age/1/sex/1>

<sup>2</sup> <https://www.gov.uk/government/groups/committee-on-the-medical-effects-of-air-pollutants-comeap>

<sup>3</sup> Cesaroni, BMJ, 2014

<sup>4</sup> Pederson, Lancet, 2013

<sup>5</sup> Takenoue, Paediatrics Int, 2012

<sup>6</sup> Jordi Sunyer, CREAL, PRBB group leader, 18 June 2014

<sup>7</sup> <http://www.escapeproject.eu>

<sup>8</sup> [http://www.iarc.fr/en/media-centre/iarcnews/pdf/pr221\\_E.pdf](http://www.iarc.fr/en/media-centre/iarcnews/pdf/pr221_E.pdf)

	<ul style="list-style-type: none"> <li>• Air quality and social deprivation in the UK (Defra)<sup>9</sup></li> <li>• Ethnic minorities and deprived communities hardest hit by air pollution<sup>10</sup></li> </ul>
7.	<p>Have you engaged or consulted with any identified groups or individuals if necessary and what were the results, e.g. have the staff forums/unions/ community groups been involved?</p> <p>SBC has developed the LES in full consultation with all relevant internal stakeholders and also undertook extensive public consultation on the draft LES from the 24<sup>th</sup> November 2017 to the 5<sup>th</sup> February 2018. This consultation included all Parish Councils. The responses from the public consultation exercise were overwhelmingly positive in support of the LES measures to improve air quality. Feedback from the public consultation has been incorporated into the final LES. A summary of consultation responses can be found on the following link - <a href="http://www.slough.gov.uk/downloads/Summary_of_LES_Consultation_Responses.pdf">http://www.slough.gov.uk/downloads/Summary_of_LES_Consultation_Responses.pdf</a></p> <p>Specific elements of the LES have been subject to individual and separate consultation ( e.g taxi licensing conditions, LHR expansion)</p>
8.	<p>Have you considered the impact the policy might have on local community relations?</p> <p>Yes – It is the aim of SBC that all residents of Slough should be able to breathe clean air that does not affect their health and life expectancy. The LES provides measures to improve air quality, which will have the most significant impact in some our most deprived areas, thus reducing health inequality and improving community relations.</p>
9.	<p>What plans do you have in place, or are developing, that will mitigate any likely identified negative impacts? For example, what plans, if any, will be put in place to reduce the impact?</p> <p>The Slough Low Emission Strategy (LES), with its aim of delivering cleaner air, will have an overall, positive impact for all the residents of Slough, and particularly for the young, the elderly, pregnant women and those in deprived communities. Slough has over 2,000 dwellings within AQMA.</p>

<sup>9</sup> [https://uk-air.defra.gov.uk/assets/documents/reports/cat09/0701110944\\_AQinequalitiesFNL\\_AEAT\\_0506.pdf](https://uk-air.defra.gov.uk/assets/documents/reports/cat09/0701110944_AQinequalitiesFNL_AEAT_0506.pdf)

<sup>10</sup> <https://www.imperial.ac.uk/news/163408/ethnic-minorities-deprived-communities-hardest-pollution/>



	<p>The LES includes a commitment to look at the feasibility of introducing a Clean Air Zone (CAZ) or Zones in the borough. The feasibility study will also look at any potential negative impacts, and will include an Equalities Impact Assessment, in addition to widespread stakeholder consultation, that will seek to identify any negative impacts at that stage and include plans, if needed, to mitigate against them.</p> <p>Proposals to change licensing conditions will be subject to a further EIA and actions have been taken to mitigate any short term negative impacts on existing licensees.</p>
10.	<p>What plans do you have in place to monitor the impact of the proposals once they have been implemented? (The full impact of the decision may only be known after the proposals have been implemented). Please see action plan below.</p> <p>In addition to the initial Health Impact Assessment (HIA), carried out by Public Health and included in the Low Emission Strategy, we will continue to assess the impact of air quality on the residents of Slough</p> <p><i>Objective 2b of the Low Emission Strategy states - 2b Use national and local data to assess the impact on health of Slough residents arising from air pollution</i></p> <p>Public Health, in conjunction with PHE, will use current national and local data to assess the impact of air quality on the health of the residents of Slough. This will include an assessment of how deprived communities are affected by poor air quality. This study will be ongoing and updated at regular intervals to monitor our progress in improving air quality.</p> <p>All key measures that will be delivered as part of the LES will be monitored against identified success criteria. Measurably improving the health of the residents of Slough will be one of the success criteria.</p> <p>The LES will be reviewed and updated within 2 years of adoption and implementation.</p>

<b>What course of action does this EIA suggest you take? More than one of the following may apply</b>	✓
<b>Outcome 1: No major change required.</b> The EIA has not identified any potential for discrimination or adverse impact and all opportunities to promote equality have been taken	<b>Yes</b>
<b>Outcome 2: Adjust the policy</b> to remove barriers identified by the EIA or better promote equality. Are you satisfied that the proposed adjustments will remove the barriers identified? (Complete action plan).	
<b>Outcome 3: Continue the policy</b> despite potential for adverse impact or missed opportunities to promote equality identified. You will need to ensure that the EIA clearly sets out the justifications for continuing with it. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact (see questions below). (Complete action plan).	
<b>Outcome 4: Stop and rethink</b> the policy when the EIA shows actual or potential unlawful discrimination. (Complete action plan).	

### Action Plan and Timetable for Implementation

At this stage a timetabled Action Plan should be developed to address any concerns/issues related to equality in the existing or proposed policy/service or function. This plan will need to be integrated into the appropriate Service/Business Plan.

<b>Action</b>	<b>Target Groups</b>	<b>Lead Responsibility</b>	<b>Outcomes/Success Criteria</b>	<b>Monitoring &amp; Evaluation</b>	<b>Target Date</b>	<b>Progress to Date</b>
Action Plan not required						

<b>Name: Jason Newman</b>						
<b>Signed:</b> <i>J Newman</i> (Person completing the EIA)						
<b>Name:</b> .....						
<b>Signed:</b> .....( Policy Lead if not same as above)						
<b>Date: 5<sup>th</sup> September 2018</b>						