

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

Equality Impact Assessment – Pre-Consultation

Inclusion of M1/M1 SP vehicles with a body type of 'motorcaravan' within the charging scheme & A575 and A580 at Worsley within the Greater Manchester Clean Air Zone



Salford City Council



Oldham Council

TRAFFORD COUNCIL



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Version Status:	FOR CONSULTATION APPROVAL	Prepared by:	Transport for Greater Manchester on behalf of the 10 Local Authorities of Greater Manchester
Reviewed by: Date:	Megan Black August 2021		

1 Introduction

- 1.1 This report is the Equality Impact Assessment (EqIA) to support the consultation process on the proposed inclusion of M1 Special Purpose motorcaravans within the charging scheme and the A575 and A580 at Worsley within the Greater Manchester (GM) Clean Air Zone (CAZ).
- 1.2 The assessment considers the potential for the inclusion of M1 Special Purpose motorcaravans within the charging scheme and the A575 and A580 at Worsley in the GM Clean Air Plan (CAP) to result in disproportionate or differential equality effects on people with protected characteristics.
- 1.3 Transport for Greater Manchester (TfGM) is coordinating this consultation on behalf of the ten GM local authorities and this report utilises TfGM's EqIA report format, set out in two sections (Section 1: Initial Screening and Section 2: Full Equality Analysis).
- 1.4 This assessment builds on the EqIA document that was published to support the GM CAP Consultation between October and December 2020 and the version published post-consultation, which can be found here: cleanairgm.com/technical-documents

2 Scope of an Equality Impact Assessment

- 2.1 An EqIA is a recognised, specific process, used to inform the development of policies in order to facilitate maximum positive outcomes and to avoid or minimise adverse impacts on particular groups.
- 2.2 An EqIA considers the impact on nine protected characteristics:
 1. age;
 2. disability;
 3. gender reassignment;
 4. marriage and civil partnership;
 5. pregnancy and maternity;
 6. race;
 7. religion or belief;
 8. sex; and
 9. sexual orientation.

2.3 An EqlA does not directly consider the impact on those communities that are economically disadvantaged or that have high level of social deprivation, unless there is a clear correlation with a protected characteristic. However, Salford Council does include socio-economic deprivation as a factor in its approach to equality and as this EqlA specifically considers two roads within Worsley (Salford), socio-economic deprivation is considered in this report.

2.4 Economic impacts of the wider CAP before and after the Covid-19 pandemic are also considered in the 'Economic Implications of CAP following consultation and with Covid-19 impacts' report which can be found online at: cleanairgm.com/technical-documents and in the updated Distributional Impacts Assessment report that will support the FBC.

3 Requirement of public bodies:

3.1 Under Section 149 of the Equality Act (2010), public bodies are subject to the Public Sector Equality Duty, which requires that they have due regard to the need to:

- a) Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under the Act;
- b) Advance equality of opportunity between persons who share a protected characteristic and persons who do not share it; and
- c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

3.2 The aim of this EqlA is to identify whether people with protected characteristics could be affected by the GM CAP disproportionately or differentially, in relation to the proposed inclusion of M1 Special Purpose Motorcaravans and the A575 and A580 at Worsley

- **Disproportionate effects** arise when an impact has a proportionately greater effect on people with protected characteristics than the rest of the population.
- **Differential effects** arise where people with protected characteristics could be affected differently from the rest of the population, due to a particular need or sensitivity.

4 Proposed changes to the Clean Air Plan Policy

4.1 An eight-week consultation on the GM CAP proposals took place between 8 October 2020 and 3 December 2020. More information about the Autumn 2020 consultation can be found online at: cleanairgm.com/technical-documents.

- 4.2 The purpose of the Autumn 2020 consultation was to seek views from residents, visitors, stakeholders and businesses on the proposals to achieve legally compliant NO2 levels in GM. The consultation was not seeking views on whether to introduce a charging CAZ, as that had been directed by the Secretary of State and so must be implemented. The consultation was instead seeking views on aspects including the boundary for the scheme, the daily charges for non-compliant vehicles, discounts and exemptions of a Category C GM CAZ, and the proposals for the supporting funds.
- 4.3 Following the 2020 consultation, the policy for the GM CAP has been updated to address a number of issues that were raised during the consultation process. This included making changes to several of the local permanent and temporary exemptions and discounts offered.
- 4.4 For example, owners of non-compliant vans and minibuses specifically adapted for use by a disabled user (and not used for commercial purposes) will now be able to apply for a permanent local exemption. This is because these vehicles have a substantial vehicle adaptation, specific to suit a disabled user's particular needs to enable them to travel in the vehicle and/or drive it.
- 4.5 Another change following consultation feedback is the establishment of a permanent local discount for non-compliant 'Private HGV tax class' vehicles. Private HGVs which are used unladen, privately or for driver training purposes would be subject to a charge equivalent to the van daily charge of £10 a day, rather than the HGV daily charge of £60 a day. This provides parity with other vehicles which are for private use only.
- 4.6 In light of information provided during the Autumn 2020 consultation, further consultation activity is required on two proposed policy changes. Further detail is set out below.

M1 Special Purpose Motorhomes

Following the 2020 consultation, it is now understood that there are several DVLA vehicle categories (also known as 'vehicle type approvals') for vehicles with a body type of 'motorcaravan' which may look similar and have similar levels of emissions.

A vehicle's categorisation can be found in the vehicle's V5C document and is determined by the manufacturers' homologation process. There are four possible categorisations on the V5C document for a motorhome/campervan:

- M1 or M1 Special Purpose (SP)
- N1
- N2
- In some cases, the field on the V5C document may be blank

- 4.7 It is estimated that there are over 4,000 non-compliant vehicles with a body type of 'motorcaravan' in GM, with the majority being liable to pay the daily charge.

4.8 The GM CAP recognises the need for parity of treatment of vehicles used for leisure purposes. The current GM CAP policy would not treat all vehicles with a body type of 'motorcaravan' equally, as some would be subject to a daily charge (N1 and N2) and some would not (M1/M1 SP). This is because under the Government's CAZ Framework, a category C CAZ does not apply charges to the M1/M1 SP group of vehicles, including those with a body-type of 'motorcaravan'. Therefore, recognising the principle of treating similar vehicle types with parity, this consultation is being held to understand the impact of including non-compliant vehicles with a body type of 'motorcaravan' classified as M1/M1 SP within the daily charge for the GM CAZ.

The Clean Air Zone Boundary

4.9 The statutory consultation set out that the proposed boundary of the CAZ would follow the existing administrative boundary of Greater Manchester as closely as possible, excluding the Strategic Road Network (SRN) which is managed by Highways England. However, feedback from the consultation highlighted that the A575 and A580 at Worsley was not included.

4.10 These sections were originally excluded as the strategic approach to signing the Strategic Road Network (SRN) in this location was initially anticipated to be challenging and costly, impacting on timescales for delivery and achieving compliant levels of NO₂. An alternative solution to signing the SRN across GM has now been identified by Highways England, which can be put in place in time for the CAZ to go live and would enable the inclusion of highway links in the Worsley area.

4.11 This further consultation therefore intends to seek feedback on the impacts of:

- Including M1/M1 SP vehicles with a body type of 'motorcaravan' within the charging scheme
- Including the A575 and A580 at Worsley within the CAZ

5 Conclusion of the Autumn 2020 consultation and the additional assessment to include M1/M1 SP vehicles with a body type of 'motorcaravan' and the A575 and A580 at Worsley

5.1 The EqIA assessment published following the consultation in Autumn 2020 concluded that improved air quality resulting from the GM CAP will have a disproportionate benefit for many protected characteristic groups namely, pregnancy and maternity; older people, young people and children; those with disability or ill-health; and those from minority ethnic and faith groups who are more likely to live in deprived neighbourhoods.

- 5.2 It also concluded that, despite the proposed package of mitigating measures, there is the risk of residual adverse impacts on some protected characteristic groups in relation to personal and business affordability: gender (male drivers), minority ethnic and faith groups. A potential, residual adverse impact in relation to accessibility was also concluded for those with following protected characteristics: older and young people; disability; gender reassignment and sexual orientation.
- 5.3 Overall, the assessment recognised that a significant package of temporary and permanent exemptions, discounts and funds has been put in place and that these have reduced the potential negative impact on protected characteristic groups. Having regard to the significant positive health benefits of the GM CAP the proposals are considered to be justified notwithstanding the residual risk of disproportionate or differential impacts on protected characteristic groups.
- 5.4 The main conclusion from this additional assessment is that GM local authorities do not expect there to be any material, additional impacts on protected characteristic groups as a result of adding M1/M1 SP vehicles with a body type of 'motorcaravan' within the charging scheme or the A575 / A580 at Worsley within GM CAZ.
- 5.5 It is worth noting that the main EqIA assessment published post the Autumn 2020-consultation concluded that there is a risk of residual adverse impacts on some protected characteristic groups in relation to personal and business affordability. Overall, that assessment recognises that a significant package of temporary and permanent exemptions, discounts and funds have been put in place and these have reduced the potential negative impacts on protected characteristic groups. It is important that those impacted by the CAZ charges have good understanding of and accessibility to the support available through the Funds and are fully aware of the wider package of exemptions and discounts available.
- 5.6 On the basis that a significant package of temporary and permanent exemptions, discounts and funds has been put in place, the EqIA assessment published post-consultation concluded that there is no indirect discrimination in relation to any of the protected characteristics outlined in the Equalities Act and it is not anticipated that the proposed changes considered in this additional assessment change this conclusion.

Equality Impact Analysis

Section one: Initial Screening

Department	Transport Strategy
Team or Service Area	Clean Air Plan – The inclusion of M1/M1 SP vehicles with a body type of 'motorcaravan' within the charging scheme & A575 and A580 at Worsley within the Greater Manchester Clean Air Zone
Officer completing the analysis	
Phone	
Email	

Type of activity	Project
Title of activity	GM Clean Air Plan to tackle Nitrogen Dioxide Exceedances at the Roadside

Under current equality legislation, TfGM and the ten Greater Manchester local authorities are required in the exercise of our functions to have due regard for the need to:

- *eliminate unlawful discrimination, harassment and victimization*
- *advance equality of opportunity between persons who share a relevant characteristic, and persons who do not share it; and*
- *foster good relations between those who have a protected characteristic and those who don't.*

Equality Analysis (formally referred to as Equality Impact Analysis (EQIA)) is a tool that will help you to consider equalities issues when drawing up or reviewing a strategy, project, policy, process or procedure which affects the delivery of services and the employment practice of Transport for Greater Manchester (TfGM). Equality Analysis will improve the work of TfGM by making sure it does not unlawfully discriminate against people and that it fulfils its duties under current equality legislation and where possible, it promotes equality.

You will need to demonstrate where appropriate that there has been engagement with beneficiary groups and at the end of this analysis you will need to provide documentary evidence of all the information you have taken into account during this process.

Question 1:

Is this a new or existing activity?

Existing.

An Outline Business Case was written in support of the GM CAP in February 2019. Since this time the GM CAP Policy has been developed and refined in response to stakeholder engagement and the consultation that took place in Autumn 2020. Following analysis of the consultation feedback and finalisation of the proposals, the plan has now been agreed by the ten GM leaders and GMCA. This further consultation intends to seek feedback on two issues that were raised in the consultation around motorhomes and two roads within Worsley.

This assessment builds on the EqIA developed to support the statutory consultation in October – December 2020, and that published post-consultation to assess the potential impact on protected characteristics of the resulting GM CAP Policy in relation to M1 Special Purpose motorhomes being included within the charging scheme and the inclusion of A575 and A580 at Worsley within the GM Clean Air Zone (CAZ).

Question 2:

What is the main aim and purpose of the activity?

The government has instructed many local authorities across the UK to take quick action to reduce harmful Nitrogen Dioxide (NO₂) to within legal limit values in the "shortest possible time". In Greater Manchester, the 10 local authorities, the Greater Manchester Combined Authority (GMCA) and Transport for Greater Manchester (TfGM), collectively referred to as "Greater Manchester" or "GM", have worked together to develop a Clean Air Plan (CAP) to tackle NO₂ Exceedances at the Roadside, referred to as GM CAP. TfGM is coordinating the development of the GM CAP on behalf of the ten local authorities.

The primary objective of the GM CAP is to achieve compliance with legal limit values in the shortest possible time. In line with Government guidance, this is the Determining Success Factor by which the programme is appraised.

A feasibility study was undertaken, and an outline business case was completed in 2019. Following this, a package of detailed GM CAP measures was developed and refined. As required by the Transport Act 2000, a statutory consultation on these detailed proposals, including the proposed charging CAZ, was undertaken between 8 October and 3 December 2020¹. Following analysis of the consultation feedback and finalisation of the proposals, the plan has now been agreed by the ten GM leaders and GMCA. This further consultation intends to seek feedback on two issues that were raised in the consultation around motorhomes and two roads within Worsley.

Feedback from the 2020 consultation highlights that there are also a group of vehicles with a body type of 'motorcaravan' and a vehicle category of 'M1 Special Purpose' that would not be charged under the current GM CAZ scheme but could be non-compliant. It is therefore proposed that for parity with motorhomes classified as N1 or N2, M1 Special Purpose vehicles with a body type of 'motorcaravan' are included within the within the charging scheme.

It also highlighted that the A575 and A580 at Worsley was not included. It is therefore proposed for parity that the A575 and A580 at Worsley are included within the GM CAZ boundary.

Further consultation is now required to ascertain views on these proposed inclusions to the CAP Policy.

Question 3:

List the main elements of the activity?

The GM CAP is a charging Class C CAZ², with additional measures to tackle nitrogen dioxide exceedances. Under a Class C CAZ owners or registered keepers of the following vehicle types are required to pay a daily charge for driving within the zone, if the vehicle does not comply with the required vehicle emission standards in the Government's CAZ Framework³:

- Buses
- Coaches
- Heavy Goods Vehicles (HGVs)
- Light Goods Vehicles (LGVs)
- Minibuses
- Licensed Hackney Carriages
- Licensed Private Hire Vehicles (PHVs)

Vehicles which meet the relevant emissions standards will not be subject to charges. A Clean Air Zone Class C does not include charging in respect of private cars and motorbikes.

¹ <https://cleanairgm.com/clean-air-plans>

² The Clean Air Zone Framework (May 2017), Dept of Transport and DEFRA classifies Clean Air Zones as being either Class A, Class B or Class C. Class C includes buses, coaches, taxis, PHVs, HGVs and light goods vehicles (LGVs).

³ Department for Environment, Food & Rural Affairs and Department for Transport. 2020. Clean Air Zone Framework. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf

Currently, vehicles with a body type of 'motorcaravan' classified as N1 or N2 that don't meet the CAZ emissions standards would be charged as follows:

- N1 (<3.5t) would be eligible for the van temporary exemption to 31st May 2023 and then from 1st June 2023 incur a daily charge of £10.
- N2 (>3.5t) and have a DVLA Tax class of Private HGV would be eligible for a discount on the daily charge to from £60 to £10 from 30th May 2022

However, a group of vehicles with a body type of 'motorcaravan' and a vehicle type approval of M1 (or M1 Special Purpose) that are non-compliant, would not be charged in the current GM CAZ scheme.

Feedback from the 2020 consultation highlights that there are also a group of vehicles with a body type of 'motorcaravan' and a vehicle category of 'M1 Special Purpose' that are also non-compliant but would not be charged under the current GM CAZ scheme. To ensure the principle of parity of treatment of all vehicles with body type of 'motorcaravan' this consultation is being held to understand the impact of including, or not, motorhomes classified as M1 Special Purpose in the GM CAZ with a daily charge. This would mean that **all** non-compliant 'motorcaravans' – N1, N2 and M1 – would pay a daily charge.

The statutory consultation set out that the proposed boundary of the CAZ would follow the existing administrative boundary of Greater Manchester as closely as possible, excluding the Strategic Road Network (SRN) which is managed by Highways England. However, feedback from the consultation highlighted that the A575 and A580 at Worsley was not included.

These sections were originally excluded as the strategic approach to signing the Strategic Road Network (SRN) in this location was initially anticipated to be challenging and costly, impacting on timescales for delivery and achieving compliant levels of NO₂. An alternative solution to signing the SRN across GM has now been identified by Highways England, which can be put in place in time for the CAZ to go live and would enable the inclusion of A575 and A580 in the Worsley area.

Further consultation will take place between 1 September 2021 and 13 October 2021.

Question 4:

If this is a new / proposed activity or a change to an existing activity, please explain why the proposal is being made / for what reason?

This assessment builds on the EqIA document that was published following the GM CAP 2020 Consultation and focuses on two specific elements of the GM CAP and the proposal that M1 or M1 Special Purpose motorhomes are included within the GM CAZ and that the A575 and A580 at Worsley are included within the GM CAZ.

Question 5:

What outcomes does the activity aim to achieve?

To address the lack of consistency for vehicles with a body type of 'motorcaravan' and a vehicle type approval of M1 (or M1 Special Purpose) against vehicles with a body type of 'motorcaravan' that have a vehicle type approval of N1 or N2, which are currently liable for a charge under the GM CAZ scheme and to include the A575 and A580 at Worsley within the GM CAZ.

Question 6:

Who are, or will be, the main beneficiaries of the activity?

Please tick one or more of the following

Travelling public	Yes
TfGM staff	No
Partners including Operators	No
Suppliers	No

Others – please specify	Yes All people living, working and travelling into and within Greater Manchester
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Question 7:

Do you need to consult with people who might be affected by it directly or indirectly? Please justify your response

An eight-week consultation on the GM CAP proposals took place between 8 October 2020 and 3 December 2020. More information about the Autumn 2020 consultation can be found online at: cleanairgm.com/technical-documents.

Further consultation is taking place between 1 September 2021 and 13 October 2021 to seek feedback on the impacts of two proposed changes to the CAP; the inclusion of M1 or M1 Special Purpose motorhomes and the inclusion of the A575 and A580 at Worsley within the GM CAZ.

Question 8:

Having due regard for the equality duty involves: Removing or minimising disadvantages suffered by people due to their protected characteristics; Taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people; Encourage people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low. Please complete the table below and give reasons, evidence and comment, where appropriate, to support your judgement(s).

Use the table below to record where you think that the activity could have a positive impact on any of the target groups or contribute to promoting equality, equal opportunities or improving relations within equality target groups. Use the table below to record where you think that the activity could have an adverse impact on any of the equality target groups i.e. it could disadvantage them and impact is high. - Use the last column in the table below to give reason/comments/evidence where appropriate to support your judgement.

Age			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Children and Young People (aged 19 and under)	High	Low	<p>From the Clean Air conversation and 2020 consultation, respondents under the age of 35 were less likely to own a motorhome</p> <p>Anecdotal evidence suggests that vehicles with a body type of 'motorcaravan', which will include campervans (e.g. a Transporter style van with a bed built in and few mod cons) are owned by younger adults.</p> <p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
Older People (aged 60 and over)	High	Medium	<p>There is evidence to suggest that motorhomes are owned by older people:</p> <p>From the Clean Air conversation and 2020 consultation, the highest proportion to own/drive a motorhome were aged between 45-64.</p> <p>The Caravan and Motorhome Club have identified the mean average age of their members who own motorhomes/ campervans and recreational vehicles (RVs) is c64 years.</p> <p>Anecdotal evidence suggests that the more luxurious Motorhomes are owned by older individuals.</p> <p>On this basis, the inclusion of M1 / M1 SP motorcaravans could impact older people disproportionately. However, the overall population of owners in GM is small and the change ensures parity across the population of motorhome / campervan owners. Therefore, the</p>

		<p>overall impact of including M1 / M1 SP is assessed to be low.</p> <p>The neighbourhoods in the vicinity of Worsley do have a higher percentage of older people. However, as the other neighbouring roads were already included in the CAZ, the addition of the A575 and A580 is not expected to create an incremental impact on this group.</p> <p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be material impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
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Disability			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
People with physical impairments (includes mobility, co-ordination, lifting and carrying, manual dexterity, wheelchair user)	High	Low	<p>Currently no data to suggest that a higher proportion of people with disabilities are motorhome owners or users.</p> <p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
People with communication or sensory impairments (includes blind/partially sighted, deaf/ hard of hearing, difficulty speaking)	Medium	Low	<p>Currently no data to suggest that a higher proportion of people with disabilities are motorhome owners</p> <p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p>

			We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.
People with a learning disability or cognitive impairment (includes conditions which affect ability to learn, understand, read, remember and concentrate e.g. Down Syndrome, autism, ADA)	Medium	Low	<p>Currently no data to suggest that a higher proportion of people with disabilities are motorhome owners.</p> <p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
People with mental health problems (includes depression, schizophrenia)	Medium	Low	<p>Currently no data to suggest that a higher proportion of people with disabilities are motorhome owners</p> <p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
Other disability / impairment not covered by any of the above			No other groups identified
Gender			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Men	Medium	Medium	<p>From the Clean Air conversation and consultation, the data evidences a higher proportion of men (66%/65%) owning or driving a motorhome</p> <p>In the 2011 census the population of Worsley was 10,035 and is made up of approximately 51% females and 49% males</p>

			<p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
Women	Medium	Low	<p>From the Clean Air conversation and consultation, the data evidences a lower proportion of women (26%/19%) owning or driving a motorhome,</p> <p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
Transgender People	Medium	Low	<p>No local data available</p> <p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>

Pregnancy and Maternity

Target Group	Positive Impact	Adverse Impact	Comment or Evidence
People who are pregnant	High	---	The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which

			<p>can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
People who have given birth in the last 26 weeks	High	---	<p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>

Race			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Asian or Asian British Backgrounds (This includes Pakistani, Indians and Bangladeshi, Chinese or any other Asian background)	High	Medium	<p>Currently no data to suggest that a higher proportion of people with from ethnic minority backgrounds are motorhome owners.</p> <p>In the 2011 census the population of Worsley was made up of 3% Asian population</p> <p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
Black or Black British Backgrounds (This includes Caribbean, African or any other black background)	High	Low	<p>Currently no data to suggest that a higher proportion of people with from ethnic minority backgrounds are motorhome owners.</p> <p>In the 2011 census the population of Worsley was made up of 0.3% Black population</p>

			<p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
Mixed /Multiple Ethnic Groups (This includes White and Black Caribbean, White and Black African, White and Asian or any other mixed background)	High	Low	<p>Currently no data to suggest that a higher proportion of people with from ethnic minority backgrounds are motorhome owners.</p> <p>In the 2011 census the population of Worsley was made up of 1.8% Mixed/Multiple Ethnic population.</p> <p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
White British Background (This includes English, Scottish & Welsh, Irish and Gypsy or Irish Travellers)	Medium	Low	<p>In the 2011 census the population of Worsley was made up of 94.6% White British population</p> <p>Salford had a higher percentage of Gypsy and Irish Travellers than the national average at the 2011 census. The traveller sites in the city are further to the west of the A575 and A580, and therefore it is unlikely to be a disproportionate impact on this group.</p> <p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
Non-British White Backgrounds (This includes Irish, Polish, Spanish, Romanians and other White backgrounds)	Medium	Low	<p>In the 2011 census the population of Worsley was made up of 0.1% other ethnic group population</p> <p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP</p>

			motorcaravans or the A575 and A580 at Worsley into the CAZ.
Arabs	High	Low	<p>In the 2011 census the population of Worsley was made up of 0.1% Arab population</p> <p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
Any other ethnic background not covered by any of the above	---	---	No other group identified.
Religion/Belief			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Buddhists	High	---	<p>In the 2011 census the religious make up of Worsley includes 0.4% Buddhist in Worsley (Census 2011)</p> <p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
Christians	Medium		<p>The largest religion in Worsley is Christianity with 74.0% Christian (Census 2011)</p> <p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
Hindus			In the 2011 census the religious make up of Worsley includes 1.1% Hindu. (Census 2011)

	High	Medium	<p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
Jews	High	Low	<p>In the 2011 census the religious make up of Worsley includes Jewish, 0.1% (Census 2011)</p> <p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
Muslims	High	Medium	<p>In the 2011 census the religious make up of Worsley includes 0.7% Muslim. (Census 2011)</p> <p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
Sikhs	High	Medium	<p>In the 2011 census the religious make up of Worsley includes 0.1% Sikh. (Census 2011).</p> <p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
Others	----	----	<p>In the 2011 census the religious make up of Worsley includes 0.1% Agnostic, 551 people did not state a religion. (Census 2011).</p> <p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following</p>

			<p>consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
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Sexual Orientation			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Gay men	----	----	<p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
Lesbians	----	----	<p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
Bisexual	Medium	Low	<p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>

Marriage and Civil Partnership			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Marriage and Civil Partnership	---	----	<p>55.1% of people are married, 10.5% cohabit with a member of the opposite sex, 0.9% live with a partner of the same sex living in Worsley (Census 2011)</p>

		<p>The impact of the CAP on this group has been assessed in the Equality Impact Assessment following consultation which can be found at: https://cleanairgm.com/technical-documents/</p> <p>We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ.</p>
Socio Economic		<p>From the Clean Air conversation and Autumn 2020 consultation, Data evidenced that more Affluent Achievers (34%) and Comfortable Communities (29%) are motorhome owners and a smaller proportion from financially stretched (17%) Urban Adversity (10%)</p> <p>The Wards of Worsley and Westwood Park, Walkden South, and Swinton and Worsley, which adjoin the A575 and A580 roads, have upto 50% less pension credit claims than the Salford average, and also a lower percentage of 16/17 year olds not in education, training or employment, reflecting a general pattern of higher socioeconomic standing than other parts of Salford. Therefore, there is less likelihood of disproportionate impact due to the inclusion of these roads on those of lower socioeconomic status.</p>

Question 9:

If this activity involves new build or alteration to existing building, has any consideration been given to provision of a multi-faith room

Not applicable

Question 10:

Have you identified two or more high adverse impacts in the table above

No

Question 11:

If you have identified one high adverse impact or any medium / low adverse impacts, what improvements to the activity would / could you make to mitigate high/medium/low adverse impact? Please give details of the improvements you plan to make

There is a significant package of measures within the GM CAP Policy to mitigate the potential unintended impacts of the charging CAZ, strengthened in response to the consultation feedback. These have already been considered in the assessment of equality impacts on specific protected characteristics above. Ensuring that those with protected characteristics who are adversely impacted by the GM CAP fully understand and feel that they have access to these mitigating measures is key to take up and to ultimately mitigating equality impacts.

Access to Funding, Discounts and Exemptions

The Funding, Discounts and Exemptions will play a crucial role in mitigating the affordability and accessibility impacts highlighted in this assessment. It is important that the following are considered in their development:

- **Digital exclusion:** Digital channels are to be the principle routes to access information and applications to the Funding, Discounts and Exemptions. The EqIA has highlighted that some protected characteristic groups impacted by the CAZ, such as minority ethnic and faith groups are more likely to live in more deprived neighbourhoods and the assessment also highlighted that older drivers could be impacted disproportionately. In both cases, digital exclusion due to lack of suitable devices or connectivity could be a barrier to accessing the funds, with alternative routes or more support made available to support those that need it.
- **Language and communication barriers:** Some of the impacted groups, such as minority ethnic and faith groups and also those with some disabilities may require additional support to access the information and application processes successfully.
- **Channels of communication:** Some of the protected characteristic groups impacted by the CAZ, particularly ethnic minority and faith groups may be more likely to trust local and informal, peer-to-peer channels of communication. It is important that these local networks are utilised as much as possible to encourage consideration and take-up of the available, mitigating measures.

Question 12:

Have you set up equality monitoring systems to carry out regular checks on the effects your activity has on:

Equality Group		Details
Age	Yes	The GM CAP Monitoring and Evaluation Plan will form an annex to the Full Business Case for the GM CAP. Responsibility for monitoring the impacts on protected characteristic groups highlighted in this assessment, will sit within the Monitoring and Evaluation (M & E) Plan.
Disability	Yes	
Gender	Yes	
Gender Re-assignment	Yes	
Race	Yes	
Religion/Belief	Yes	
Sexual Orientation	Yes	
Maternity and Pregnancy	Yes	
Marriage and civil partnerships	N/a	

Question 13:

How will you measure the success of this activity? (including any corporate performance measures)

The success of the GM CAP will be measured through a programme of outcome and output measurement, which will be contained in the Monitoring and Evaluation Plan which will be appended to the Full Business Case.

The key measure of success will be through air quality monitoring, specifically compliance with the legal limit values for concentrations of NO₂.

Question 14:

In question 10 above you may have outlined improvements to the activity which will mitigate a high,

medium and/or low adverse impact(s). How will you ensure that everyone involved in the activity knows and understands what improvements you intend to make and is able to put the activity into practice with those improvements?

The outcome of the EqIA is being used to ensure that recommendations are embedded in the service design. In particular, in relation to reducing barriers for impacted groups to access the support that will be available, as detailed in Question 11.

Question 15:

Are there any elements within this activity that require a separate Equality Impact Analysis?

No

Question 16:

Please confirm that during the implementation of this activity, where appropriate, TfGM’s corporate strategies and procedures will be followed. If your answer to any of these questions is ‘no’ explain why you will not be following the strategy or procedure.

Strategy / Policy		Details
Communication with members of the public – TfGM’s Corporate Communications Strategy will be followed	Yes	---
Consultation and Engagement – TfGM’s Consultation and Engagement Strategy will be followed	Yes	---
Projects – Project Management Procedures will be followed	Yes	---

Question 17:

Is a Full Impact Analysis needed? If in question 8 you identified two or more adverse impacts you should either abort the activity, or carry out a full analysis

A Full Impact Analysis of the CAP has been assessed in the Equality Impact Assessment following consultation which can be found at: <https://cleanairgm.com/technical-documents/>

We do not expect there to be any additional impacts on this group as a result of adding M1/M1 SP motorcaravans or the A575 and A580 at Worsley into the CAZ. Therefore, a Full Impact Analysis is not required.

Question 18:

List all of the information that you have taken into account in carrying out this Equality Analysis.

1. Consultation Document for the inclusion of M1/M1 SP vehicles with a body type of 'motorcaravan' within the charging scheme & A575 and A580 at Worsley within the Greater Manchester Clean Air Zone; <https://cleanairgm.com/consultation>
2. <https://cleanairgm.com/clean-air-plans>
3. GM Clean Air Plan Policy Following Consultation <https://cleanairgm.com/technical-documents/>
4. GM Equality Impact Assessment Following Consultation <https://cleanairgm.com/technical-documents/>
5. GM CAP EqIA following consultation – evidence report <https://cleanairgm.com/technical-documents/>
6. AECOM Consultation report <https://cleanairgm.com/technical-documents/>
7. ONS (2011) Census data by local authority
8. ONS (2011) Census data by local authority: religion or belief. Available at: <http://infuse2011.mimas.ac.uk/>
9. ONS Census 2011. KS103EW- Marital and Civil Partnership Status, 2011. Available at: <https://www.nomisweb.co.uk/query/construct/submit.asp?menuopt=201&subcomp=>

Question 19:

Additional comments

None

Supporting documents

None