

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

Appendix 2 - GM CAP EQIA following consultation - Evidence report - Oldham assessment



Oldham
Council

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1 Local Authority EqIA Appendix

1.1 Introduction

An Equality Impact Assessment (EqIA) has been developed at a Greater Manchester (GM) scale for the GM Clean Air Plan (GM CAP) in line with the public sector equality duty in section 149 of the Equality Act 2010.

The GM wide assessment builds on EqIAs that were published at the Outline Business Case stage in 2019 and the EqIA developed to support the consultation in late 2020. It considers the impacts on protected characteristics related to the implementation of CAZ C charging zone in GM and how implementation of the proposed package of mitigation measures addresses any identified equality impacts. This EqIA is an update following changes to the GM CAP policy made in consideration of feedback received during the consultation.

The EqIA is supported by an Equality Impact Evidence Report, appended to the EqIA¹.

1.2 Local Authority Assessment

This appendix to the GM EqIA includes an assessment of equality carried out by Oldham Council. The reasons for individual LA assessments include:

- To fulfil legal requirements placed on LAs to meet their duty under the Equality Act;
- To ensure that each of the LAs has considered and understood the full GM EqIA report and the context for the LA itself;
- To identify any LA baseline profile nuances or differences to that presented in the GM EqIA (Appendix A in the Equality Impact Evidence report).
- To review the assessment outcomes of the GM EqIA and identify whether impacts would be more or less significant within the LA areas;
- To highlight any geographical 'hot spots' with LA areas;
- To identify any actions LAs could take to mitigate and monitor equality impacts identified (specific to the LA area rather than applicable across GM as a whole).

1.3 Oldham's approach to Equality Impact

Oldham Council developed a standard approach to assessing Equality Impact to meet the requirements of the Public Sector Equality Duty,

¹ <https://cleanairgm.com/technical-documents/>

consisting of an initial assessment, full assessment and an impact action plan. This is to ensure the authority has an understanding of our diverse communities and take account of their needs when designing policies and delivering services.

In addition to the Protected Characteristics identified in the GM CAP EqIA, Oldham Council also assesses Low Income in its Equality Impact Assessments.

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2 Oldham Council EqIA

2.1 Baseline data review

2.1.1 Introduction

We have considered the baseline data that is available at a Greater Manchester level and the Oldham specific data the overall finding and mitigations are comparable with the position in Oldham.

2.1.2 Baseline data updates

In- Scope Protected Characteristic	Overview for Oldham in relation to GM picture and any significant variation across the borough.	'Outliers' within the Local Authority (LSOAs or communities with a particularly high proportion of a protected characteristic)								
Age	See "outliers" for ONS MYE 2019. There are significant age differentials across the borough, with older people particularly concentrated within more rural and geographically outlying wards.	See table 1 below								
Disability	No updates since Census 2011. Picture is expected to be broadly similar to that across GM, with the proviso that with greater levels of deprivation there are likely to be higher proportions with limiting long term illness, and potentially more unpaid care being delivered.	NA								
Pregnancy and Maternity	No known updates compared to the GM wide baseline report	NA								
Race	<p>2021 projections of ethnicity in Oldham are shown below, based on 2020 projection model.</p> <p>Oldham's demography is less diverse than that of Manchester, but more so than some other GM boroughs.</p> <p>Pakistani and Bangladeshi heritage communities have high levels of deprivation and form a high proportion of the taxi drivers within the borough, particularly within the Pakistani community.</p> <table border="1"> <thead> <tr> <th>YEAR</th> <th>2021</th> </tr> </thead> <tbody> <tr> <td>Population - All</td> <td>246,200</td> </tr> <tr> <td>White British and Irish</td> <td>167,420</td> </tr> <tr> <td>White Other</td> <td>6,770</td> </tr> </tbody> </table>	YEAR	2021	Population - All	246,200	White British and Irish	167,420	White Other	6,770	NA
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Pakistani	29,420											
Bangladeshi	21,670											
Asian Other	5,050											
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Mixed or other	8,170											
Religion	We have a larger percentage of Muslims in Oldham than the Greater Manchester average due to our large Bangladeshi and Pakistani communities.	NA										
Sex	Gender split is expected to be in line with GM, and with no significant change since Census 2011.	NA										
Transgender	We currently have no data on transgender population in Oldham to compare to numbers in Greater Manchester.	NA										

Table 1: Population of over 65 years across Oldham

Ward Code	Ward Name	All Ages	65+	%
E05000719	Alexandra	15,020	1,410	9%
E05000720	Chadderton Central	11,108	2,005	18%
E05000721	Chadderton North	11,281	1,999	18%
E05000722	Chadderton South	11,299	1,855	16%
E05000723	Coldhurst	13,475	1,191	9%
E05000724	Crompton	10,215	2,650	26%
E05000725	Failsworth East	10,229	1,986	19%
E05000726	Failsworth West	10,405	2,127	20%
E05000727	Hollinwood	12,400	1,667	13%
E05000728	Medlock Vale	14,334	1,376	10%
E05000729	Royton North	9,831	2,438	25%
E05000730	Royton South	10,823	2,378	22%
E05000731	Saddleworth North	9,779	2,351	24%
E05000732	Saddleworth South	10,132	2,614	26%
E05000733	Saddleworth West and Lees	10,824	2,374	22%
E05000734	St James'	12,661	1,621	13%
E05000735	St Mary's	15,710	1,254	8%
E05000736	Shaw	10,183	2,164	21%
E05000737	Waterhead	13,395	1,670	12%
E05000738	Werneth	14,006	1,182	8%
	OLDHAM TOTAL	237,110	38,312	16%

2.1.3 Socio-Economic Characteristics

Under the Equality Act, socio-economic characteristic is not a Protected Characteristic. As a result, the GM EqIA for CAP does not consider the impacts on the scheme on difference socio-economic groups. A Distributional Impact Assessment (DIA) has been undertaken for the programme which does consider these impacts.

Oldham does consider those on low income as part of its standard EqIA process but accepts and supports the GM view to not include in this case.

2.2 Equality impacts review

The following table summarises the equality impact assessment for the scoped-in characteristics for Oldham in relation to the GM assessment described in the GM CAP EqIA.

Protected characteristic	Assessment topic	Impact (+/-)	Magnitude of impact post mitigation (extent of population exposure to impact)		Differential/ Disproportionate	Reason for difference in impact from GM assessment
			GM	Oldham		
Age	Air quality	+	High	High	Differential	No difference to GM assessment
	Accessibility	-	Low	Low	Disproportionate	No difference to GM assessment
	Affordability	-	Low	Low	Disproportionate	No difference to GM assessment
Disability ²	Air quality	+	High	High	Differential	No difference to GM assessment
	Accessibility	-	Low	Low	Disproportionate	No difference to GM assessment
	Affordability	-	Low	Low	Disproportionate	No difference to GM assessment
Pregnancy and maternity	Air quality	+	High	High	Differential	No difference to GM assessment
	Accessibility	No equality impact				
	Affordability	No equality impact				
Race ³	Air quality	+	High	High	Disproportionate	As we have a large number of BME residents residing in the St. Mary's, Alexandra, Werneth and Coldhurt, which are also wards with Air Quality

² Disability covers a wide range of physical and mental impairment. Where the impact would differ dependent on disability this is flagged in the narrative.

³ Race covers all races identified within the ONS dataset. Where the impact would differ for different races, this is identified in the narrative.

Protected characteristic	Assessment topic	Impact (+/-)	Magnitude of impact post mitigation (extent of population exposure to impact)		Differential/ Disproportionate	Reason for difference in impact from GM assessment
			GM	Oldham		
						Management areas in them, this positive impact may be greater in Oldham.
	Accessibility	-	Low	Low	Disproportionate	No difference to GM assessment
	Affordability	-	Low	Medium	Disproportionate	We have a larger percentage of BME residents in Oldham than the Greater Manchester average due to our large Bangladeshi and Pakistani communities, a high number of which work in the taxi trade, therefore anything that effects affordability in this sector may have a higher disproportionate effect in Oldham than in Greater Manchester.
Religion ⁴	Air quality	+	?	High	Differential	As we have a large number of Muslim residents residing in the St. Mary's, Alexandra, Werneth and Coldhurt, which are also wards with Air Quality Management areas in them, this positive impact may be greater in Oldham.
	Accessibility	No equality impact				
	Affordability	-	Low	Medium	Disproportionate	We have a larger percentage of Muslims in Oldham than the Greater Manchester average due to our large Bangladeshi and Pakistani communities, a high number of which work in the taxi trade, therefore anything that effects affordability in this sector may have a higher disproportionate effect in Oldham than in Greater Manchester.

⁴ religion covers all religions identified within the ONS dataset. Where the impact would differ for different religions, this is identified in the narrative.

Protected characteristic	Assessment topic	Impact (+/-)	Magnitude of impact post mitigation (extent of population exposure to impact)		Differential/ Disproportionate	Reason for difference in impact from GM assessment
			GM	Oldham		
Sex	Air quality	No equality impact				
	Accessibility	No equality impact				
	Affordability	-	Medium	Medium	Disproportionate	Taxi drivers, PHV drivers and bus drivers are over 90% more likely to be male than female. Any business costs are therefore likely to be disproportionately experienced by men.
Gender Reassignment	Air quality	No equality impact				
	Accessibility	-	Low	Low	Differential	No difference to GM assessment
	Affordability	No equality impact				
Sexual orientation	Air quality	No equality impact				
	Accessibility	-	Low	Low	Differential	No difference to GM assessment
	Affordability	No equality impact				

2.3 'Hot-spots' in your Local Authority

2.3.1 Geographical 'hot-spots' in Oldham

A high proportion of Oldham's Air Quality Management area is due to roads operated/managed by Highways England as part of the strategic road network (SRN), such as the M60 motorway. The M60 will not be part of the GM CAZ charging scheme so potentially residents living close to the SRN in Chadderton South, Hollinwood, and Failsworth East may therefore not benefit as much from a reduction in Nitrogen Dioxide levels as the rest of the Borough.

Oldham has a higher percentage of it's over 65's in wards in the North and East of the Borough. The wards in the East i.e. Saddleworth North, South and West are particularly rural and cover a large geographical area, so people without their own access to private vehicles in these areas may be more reliant on public transport and taxis for essential journeys. If the result of the CAZ is an increase in taxi and bus fares or reduction in services people in this area could be disadvantaged with potentially the over 65 disproportionately affected, although the travel pass for Older People in Greater Manchester may reduce this impact for some. These areas also do not suffer from elevated levels of air pollution so the benefit to the over 65's in these areas will not be as great.

A large percentage of Oldham's Air Quality Management area is centred in the Coldhurst, Werneth, St. Mary's and Alexandra wards, so the population that live in these areas should benefit most from improved Air Quality in terms of potential health benefits. A high percentage of the population in these areas are from BME groups, so potentially this may have a more positive impact on BME population than in the rest of the Greater Manchester area. Conversely these are currently also some of the most deprived wards, so residents here may be more likely to use public transport and taxis and therefore be more economically affected if the CAZ results in bus and taxi fare rises or a reduction in services.

2.3.2 Protected characteristic 'hot-spots' in Oldham

As can be seen from the information in the table below, most of the taxi drivers licenced with Oldham also reside in the borough. As previously stated, Pakistani and Bangladeshi heritage communities form a high proportion of these taxi drivers, particularly within the Pakistani community. The vast majority of these are also likely to be from the Muslim faith with a great many residing in the Werneth, Medlock Vale, Alexandra and St. Mary's wards.

If the result of the CAZ means that taxi drivers are disproportionality affected from an affordability aspect, e.g. paying the daily CAZ charge or

having to change vehicle earlier than expected, then these communities in these wards may be greater impacted by this effect

Data on Oldham taxi drivers:

Type of Vehicle	Number licensed
Hackney Carriage	85
Private Hire	959
TOTAL	1044

Age Range	Number of drivers
21-29	76
30-39	377
40-49	480
50-59	294
60+	185

Resides	Number of drivers
In Oldham	1278
Out of Borough	173

2.4 Actions to be taken by Oldham

2.4.1 Mitigate any potential equality impacts identified.

The council will promote the various funds, finance scheme, exemptions and discounts available to businesses, including taxi and private hire drivers/operators and bus operators and encourage the take up of such schemes via, social media, the chamber of commerce and the taxi licensing teams interaction with drivers and operators.

We will lobby Highways England to take action to improve the air quality from the M60 to ensure that residents living close to the M60 also see an improvement in air quality.

2.4.2 Monitor any potential equality impacts identified.

We will monitor any changes to number of licenced taxi and hackney carriage drivers and operators in the borough.

We will monitor the percentage change in number of Wheelchair Accessible Vehicles in Hackney Carriage and Private hire fleet.

We will monitor the number of applications from Oldham based businesses and private individuals, like Hackney and private hire drivers for Clean Funds and vehicle finance to examine how they compare to the other GM areas.

We will continue to monitor the air quality across the borough, including in residential areas close to the M60.

We will utilise any commissioned resident's survey.

2.4.3 Review any potential equality impacts identified.

We will continue to annually review the air quality levels in the borough via the Annual Status Report on Air Quality.

Review monthly the take up of Clean Funds and vehicle finance by Oldham based businesses and individuals.

Review feedback from resident's surveys.

2.4.4 Outline local monitoring and review plan.

To be developed during the Prepare to Operate phase.