



# Appendix 3 - Equality Impact Assessment (EqIA)

**APPROVAL OF 2022-2027 LBL AIR QUALITY ACTION PLAN (AQAP)**

VERSION1 | MAY 2022

# Appendix 3 - Equality Impact Assessment (EqIA)

## About this document

The need to undertake an Equality Impact Assessment (EqIA) arises from Section 149 of the Equality Act 2010. It is meant to help public bodies to tackle prejudice, promote understanding and advance equality of opportunity for persons who share a relevant 'protected characteristic'. Protected characteristics are Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race (ethnicity), Religion or belief, Sex, Sexual orientation.

The EqIA ensures proposals are fair, do not negatively impact equality groups in disproportional ways and do generally impact all groups positively. As engagement and proposals progress, the EqIA will be reviewed and updated accordingly.

This EqIA is evaluating the impact of the 2022-2027 LBL Air Quality Action Plan (AQAP) on the different groups.

## Aim of this Assessment

London Borough of Lewisham (LBL) is required to have an Air Quality Action Plan (AQAP) as part of the Council's duty to manage local air quality. The AQAP should set out the commitment and actions that will be taken by LBL to improve air quality between 2022 and 2027. This action plan replaces the previous plan which ran from 2016 to 2021. An EqIA is needed to assess the impact of the 2022-2027 LBL Air Quality Action Plan (AQAP) on the different groups.

## Overall Impact of the AQAP on Equality

Air quality has a major impact on the health and quality of life of residents and visitors to the borough. Air pollution can have a detrimental effect on people's health, especially our most vulnerable citizens; children, the elderly and people with existing health conditions. The Council has made important strides in improving air quality in the borough in recent years but we know there is more that needs to be done. We want to work with residents, local businesses and our London partners to make Lewisham a cleaner, greener, healthier place to live, work and visit.

Improving air quality is likely to improve the health of the general population but mostly those living in deprived areas and from Black, Asian and Minority ethnic groups. The Equality Impact Analysis shows that the current AQAP measures impact all groups positively overall and in particular the ones that may traditionally suffer from inequalities such as children, young adults, disabled people, pregnant women and young mothers, members of the LGBT community and Black, Asian and Minority ethnic groups.

In an area of low employment and income, the most deprived are likely to be affected by poor air quality and most likely to benefit from the AQAP if approved, adopted and implemented.

The age distribution of the respondents to the AQAP consultation corroborate with the most active group of the population or those most able to use the internet to respond to the consultation. The distribution of the ethnicity is in line with most consultation surveys and suggests the need for the Council to engage with diverse groups of the population.

Suitable measures have been taken to mitigate any negative impact on equality. A summary of the assessment is as follows.

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<b>Author</b>	Dr Eliane Foteu	<b>Directorate</b>	Public Realm	
<b>Date</b>	May 2022	<b>Service</b>	Environmental Health/Environmental Protection	
<b>1. The project or decision that this assessment is being undertaken for</b>				
<p>London Borough of Lewisham (LBL) is required to have an Air Quality Action Plan (AQAP) as part of the Council's duty to manage local air quality. The AQAP should set out the commitment and actions that will be taken by LBL to improve air quality between 2022 and 2027. Schedule 11 of the Environment Act 1995 requires local authorities to consult on their AQAP with a range of persons and organisations. Consultation was undertaken between September and October 2021 and the plan updated with the suggestions made by the consultees. It is recommended that committee:</p> <ul style="list-style-type: none"> <li>• Note the consultation responses report</li> <li>• Note the changes made to the draft AQAP following consultation</li> <li>• Note the new World Health Organization (WHO) air quality guideline for PM<sub>2.5</sub></li> <li>• Review and approve the final AQAP</li> </ul>				
<b>2. The protected characteristics or other equalities factors potentially impacted by this decision</b>				
<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Ethnicity	<input checked="" type="checkbox"/> Maternity	<input checked="" type="checkbox"/> Language spoken	<input checked="" type="checkbox"/> Other, please define:
<input checked="" type="checkbox"/> Gender	<input checked="" type="checkbox"/> Gender identity	<input checked="" type="checkbox"/> Disability	<input checked="" type="checkbox"/> Household type	
<input checked="" type="checkbox"/> Religion	<input checked="" type="checkbox"/> Carer status	<input checked="" type="checkbox"/> Sexual orientation	<input checked="" type="checkbox"/> Income	
<p>The GLA report<sup>1</sup> analyses the relationship between exposure to air pollution, deprivation and ethnicity in London in 2019. This GLA report builds on previous analysis undertaken on behalf of the Greater London Authority: Air Pollution Exposure in London: Impact of the Environment Strategy (2019), updated Analysis of Air Pollution Exposure in London (2017) and Analysing Air Pollution Exposure in London (2013). These reports all focused on air quality in London, seeking to identify whether air pollution had a role in health and social inequality and the degree to which it could be quantified (using data available at that time). The later report shows communities which have higher levels of deprivation, or a higher proportion of people from a non-white ethnic background, are still more likely to be exposed to higher levels of air pollution. However, thanks to the Mayor's policies, the gap between the most and least deprived areas for exposure to NO<sub>2</sub> has narrowed by up to 50%.</p> <p>The above research has revealed a relationship between poor air quality and social, cultural and economic factors. Age, ethnicity, previous health condition, disability income have the highest impact on this decision. Impact of other factors on Air quality have are yet to be proven and researched.</p> <p>In order to ensure that the voice of everyone is heard, the general public was consulted on the draft AQAP and the results of the consultation exercise carried out between September and October 2021 suggest failure of engagement among minority groups in Lewisham. The failure of engagement can be attributed to cultural differences or social and economic inequalities, with the people from Black and Minority Ethnic (BME) backgrounds (which are more impacted by air quality in accordance with recent research), more likely to be interested in meeting their financial and socio-cultural needs than taking part in surveys with others potentially not having English as a first language.</p> <p>A summary of public health air quality indicators for London authorities is available online for consultation. For Lewisham, the values and trends of indicators are currently 6.4, 11.3 and 55.5% respectively for the fraction of mortality attributed to particulate air pollution; air pollution: fine particulate matter both for the year 2019; and the proportion of population living within Air Quality Management Areas (AQMAs) (%) in 2017. These indicators will be monitored throughout the course of this plan.</p>				
<b>3. The evidence to support the analysis</b>				

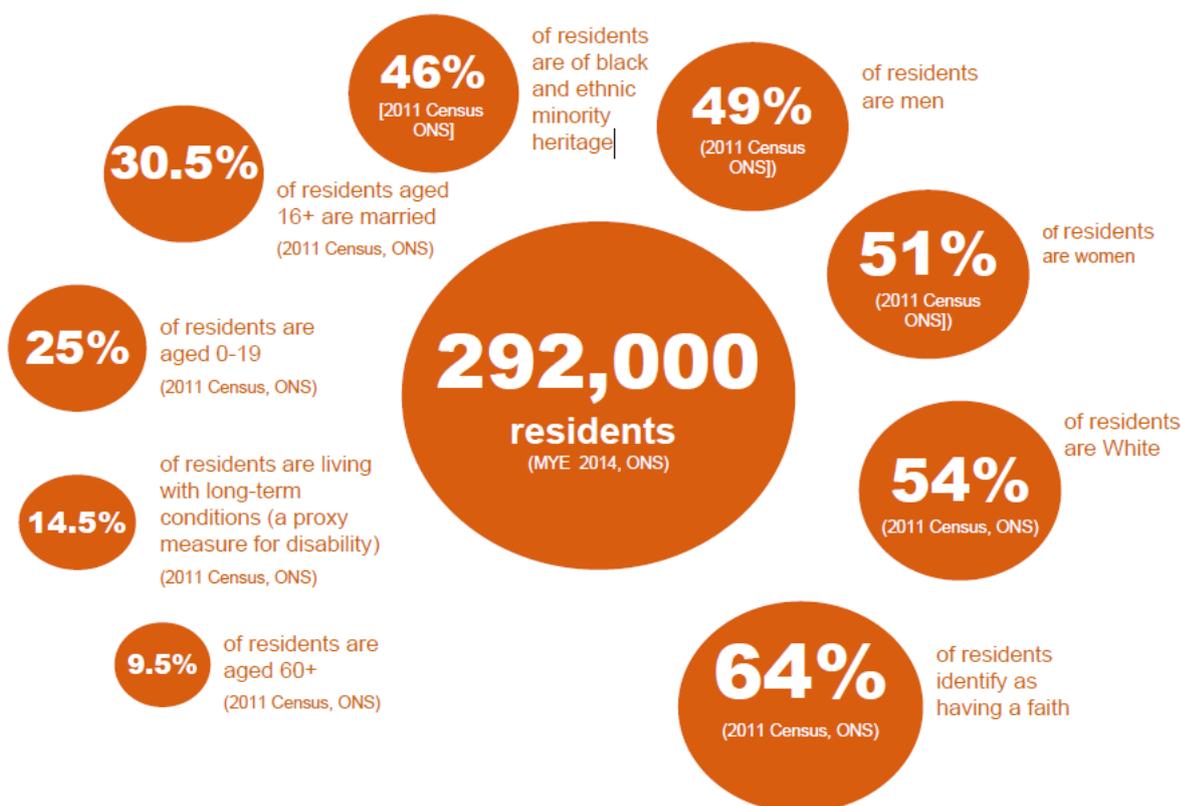
<sup>1</sup> [https://www.london.gov.uk/sites/default/files/air\\_pollution\\_and\\_inequalities\\_in\\_london\\_2019\\_update\\_0.pdf](https://www.london.gov.uk/sites/default/files/air_pollution_and_inequalities_in_london_2019_update_0.pdf)

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This information about demographics of the survey has been sourced from Census 2011, the Lewisham's Joint Strategic Needs Assessment dated 2018 and a 2016-2020 comprehensive Equalities Scheme Data sift analysis undertaken for 2016-20 all available online to support this AQAP EqIA.

**Age:** The total population of the borough is 275,900, an increase of 27,000 (9.8%) since the 2001 Census. According to Lewisham's Joint Strategic Needs Assessment, one in five of the overall population is under 15, but this is doubled in the Bangladeshi group, and more than more than doubled in the Black Other group. The under 15 proportion is lowest in the White and Chinese groups. The proportion in the over-65 group is highest in the White, Black Caribbean, Indian, and Chinese groups. In 2008/09 there were 35,062 pupils enrolled in Lewisham's 91 schools, 61% of which were from black and minority ethnic (BME) communities (3% not known). This percentage of BME pupils is significantly different from the proportion within the resident population. This could be interpreted as an indication of the future ethnic make-up of Lewisham's adult population, knowledge that could assist in planning services for both the current population aged under 18 years and future adult service users. However, it must be noted that some areas of the borough have a highly mobile population and some pupils attending Lewisham schools may not reside in the borough. As such, this information cannot be used as the sole basis of predicting future need.

A current 2016-2020 Comprehensive Equalities Scheme Data sift analysis undertaken shows the following figures:



With reference to the AQAP consultation responses, the majority (17.43%) of respondents were between 45-49 years of age. People aged 18-24 and 75-79 represented the age groups with the lowest (8.3% for each) proportion of responses. 6.22% of respondents provided no answer to the age question and 5.39% did not to state their age. The residual percentage was distributed among other categories.

Poor air quality affects the most vulnerable people in Lewisham therefore the adoption of the AQAP is likely to have a positive health impact on children and the elderly.

**Ethnicity:** According to Lewisham's Joint Strategic Needs Assessment, Lewisham is the 15<sup>th</sup> most ethnically diverse local authority in England, and two out of every five residents are from a black and minority ethnic background. The largest BME groups are Black African and Black Caribbean. Black ethnic groups are estimated to comprise 30% of the total population of Lewisham. Whilst the most populous ethnic group remains White British, both the actual

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number and proportion of residents stating this as their ethnicity has decreased since 2001. The next biggest group is now Black African.

A Comprehensive Equalities Scheme Data sift analysis undertaken for 2016-20 shows that the largest combined ethnic group in the borough is categorised in the census as White; English/Welsh/Scottish/Northern Irish/British. New Cross ward has the highest proportion of people whose self-identified ethnicity is Black African. Catford South has the highest number of people who identify as Black Caribbean.

7.14% provided no answer and 7.14% preferred not to state their ethnicity. Of those that did, the majority of respondents (71 %) were white with the rest distributed across other ethnic groups. This indicate that the view of BME groups who are more likely to be impacted by air quality remain limited.

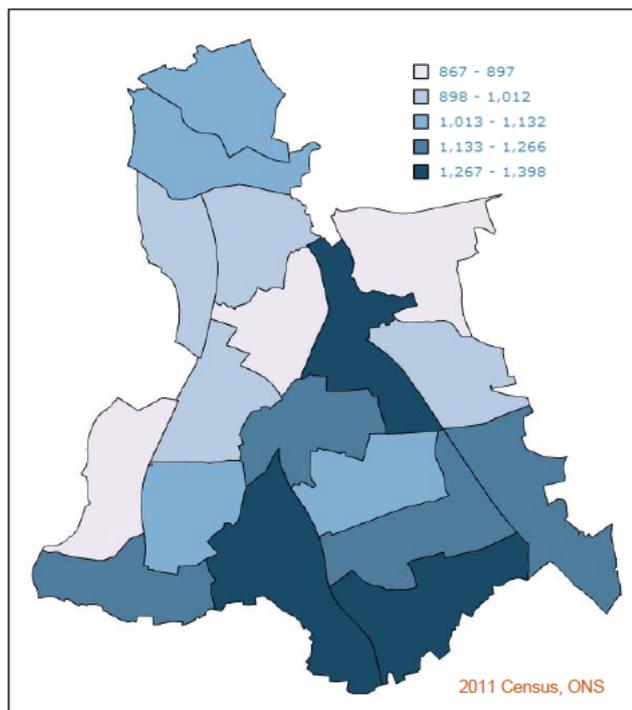
The adoption of the AQAP is likely to have a positive impact of the health of all groups of the population in Lewisham and beyond.

**Sex:** There were slightly more male (44.96%) than female (43.70%) respondents. Some did not answer or preferred not to state their gender; this is contrary with the age demography presented in the 2016-2020 Comprehensive Equalities Scheme Data sift i.e. 49% of residents are men and 51% of residents are women.

The adoption of the AQAP is likely to have a positive impact of the health of all group of the population in Lewisham and beyond.

### Disability:

Number of people whose day-to-day activities are limited a lot



### Context

- A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out standard day-to-day activities
- The Equality and Human Rights Commission guidance defines disability in terms of its effects rather than underlying categorisation of impairments
- Analysis of Lewisham's recent residents survey found that less than half of disabled residents (48%) were confident that their local community would be able to help if a service in their local area was under threat, compared to two-thirds of non-disabled residents (66%) PPU 2015
- Analysis by Public Health England for its learning disability profiles indicates that Lewisham has average numbers of learning disabled people (16-64) known to the Council (four per 1000).

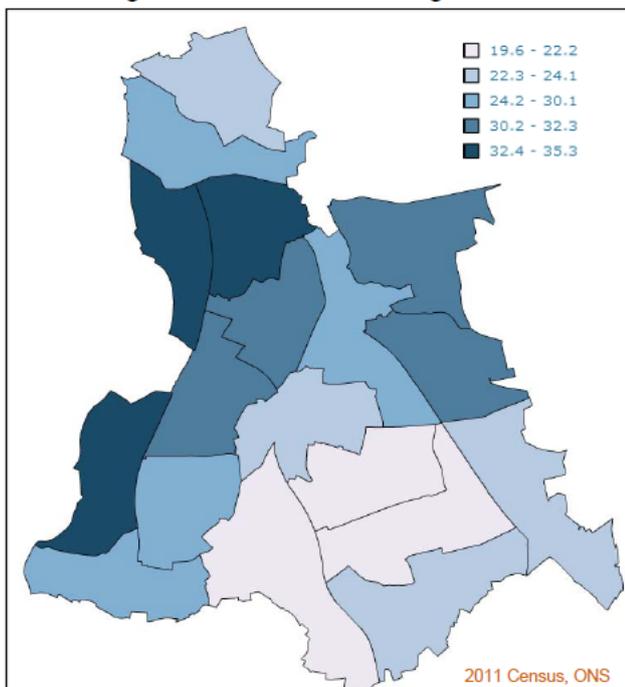
7.14% were disabled (disabilities distributed across all categories), 9.24% provided no answer, 6.30% preferred not to say, the majority of respondents did not identify as disabled. Easy read, step-free access, accessible toilets, wheelchair access were among suggestions given to improve accessibility of the consultation.

The adoption of the AQAP is likely to have a positive impact of the health of all groups of the population in Lewisham and beyond.

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**Religion:** Christianity was the most common religion in Lewisham at the time of the 2011 Census (53%), followed by Islam (6%). About 27% of people stated they had no religion and 9% did not state their religion or belief. As seen across Britain the proportion of residents stating they do not have a religion has increased to 27.2% of the population.

Percentage of residents with no religion



### Context

- Protections for religion or belief have been challenged and broadened at employment tribunals and in case law
- *Eweida and Chaplin v the United Kingdom* focused on the wearing of religious symbols at work
- *Ladele and McFarlane v the United Kingdom* – found that employees could not be exempted from their duties (an registrar and a counsellor) because of their religious beliefs
- Belief in climate change and some political beliefs have been used at tribunal as grounds for protection under the act
- To be considered as a belief it must be of 'sufficient cogency, seriousness, cohesion and importance and... worthy of respect in a democratic society'.

The majority (48.55%) did not state a religious preference, 9.54% preferred not to say anything about their religion and 17.43% provided no answer. Of those that did respond 19.09% were Christians, the remainder were distributed among other religions.

The adoption of the AQAP is likely to have a positive impact of the health of all faith in Lewisham and beyond.

**Sexuality:** according to Lewisham's Joint Strategic Needs Assessment, there are no accurate statistics available regarding the profile of the lesbian, gay, bisexual and transgender (LGBT) population either in Lewisham, London or Britain as a whole. Sexuality is not incorporated into the census or most other official statistics. The Greater London Authority based its Sexual Orientation Equality Scheme on an estimate that the lesbian and gay population comprises roughly 10% of the total population. This would make the lesbian and gay population of the borough roughly 20,000, although whether this includes bisexual or transgender individuals is unclear.

About 0.4% of Lewisham households comprise same sex couples in civil partnerships (Census 2011). This is more than double the average for England.

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- In 2007, a question on sexual orientation was added to the Council's Annual Resident Survey for the first time;
- the results showed that out of 1,042 respondents 92 per cent identified themselves as heterosexual/ straight, whilst 2 per cent identified as being gay, lesbian or bisexual;
- In the 2009 Annual Resident Survey, the same question was asked and out of a total of 1,022 people 95 per cent identified themselves as heterosexual/straight and 1 per cent identified as being gay, lesbian or bisexual;
- in 2014 a total of 1022 people were asked, 88 per cent identified themselves as heterosexual/straight 4 per cent identified as gay, lesbian or bisexual

Lewisham Residents' Surveys 2007, 2009, 2012: Policy and Partnerships

### Context

- Information about sexual orientation is not gathered by the census
- There are no reliable local measures for determining the numbers of gay, lesbian and bisexual people
- Each of the groups within the category has its own levels of diversity and differentiation
- Public Health England estimates project the numbers of men who have sex with men for epidemiological modelling, which provides an approximation of the distribution of gay men in the borough based on access to sexual health services
- This modelling indicates that the population of MSM in Lewisham is between 4 and 8 per cent of the male population (aged 16-44).
- Lambeth and Southwark are estimated to have MSM populations of between 12 and 20 per cent, representing populations of 15,000 and 10,000 respectively.

The majority (62.24%) of respondents identified as heterosexual, the remainder of respondents was distributed among other categories. 11.62% preferred not to say their sexuality and 16.60% who provided no answer.

The adoption of the AQAP is likely to have a positive impact of the health of all Lewisham's population.

### Gender Identity:

- Information about the trans\* community is not collected in the census
- No information exists locally about the extent or distribution of the trans\* community
- The Gender Identity Research and Education Society (GIREs) has carried out work estimating the size of the transgender population in the UK
- It is estimated that there are between 10 and 45 people per 100,000 presenting as trans\* in different areas of the UK
- GIREs research indicates that the trans\* community is susceptible to high levels of change and mobility
- The effect of supportive services and provision of support to members of the community is likely to enable more people to come forward to health professionals.

### Context

- Protection based on gender reassignment is included in the 2010 equality act
- The focus on numbers of people is unlikely to give an indication about the levels of prejudice and discrimination affecting the community
- GIREs highlights that trans\* people face discrimination and associated problems with safety and mental health as a result of discrimination and prejudice
- Work by GIREs also indicates that the numbers trans\* people accessing medical services each year is increasing.

GIREs: <http://www.gires.org.uk/>

The majority (67.22%) of respondents identified with the same gender as the one that they had at birth. The remainder were distributed among other categories with 10.79% preferring not to say their gender at birth, 21.16% provided no answer. 0.83% had different a gender identity from the one that they had at birth.

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The adoption of the AQAP is likely to have a positive impact of the health of all Lewisham's population.

### Geographic location :

- The majority of respondents (14.11%) live in Lee Green, and 12.45% live in Lewisham Central. The remainder were distributed among other locations with 2.49% not living in Lewisham. 12.45% provided no answer.

	Males				Females			
	2011 Census		2001 Census		2011 Census		2001 Census	
	Number	%	Number	%	Number	%	Number	%
<b>Residents aged 16-74</b>	100,913		88,675		105,342		94,460	
Managers, directors & senior officials	7,711	11.1	10,219	17.1	5,426	8.2	6,620	12.1
Professional occupations	14,891	21.3	8,860	14.8	15,918	24.0	7,403	13.5
Associate professional and technical occupations	12,468	17.9	10,105	16.9	10,007	15.1	10,397	19.0
Administrative & secretarial occupations	4,636	6.6	5,292	8.8	11,395	17.2	13,668	25.0
Skilled trades occupations	9,419	13.5	8,453	14.1	1,613	2.4	938	1.7
Caring, leisure & other service occupations	3,183	4.6	1,914	3.2	9,640	14.5	6,077	11.1
Sales & customer service occupations	4,498	6.4	3,081	5.1	5,874	8.9	4,857	8.9
Process, plant & machine operatives	4,981	7.1	4,707	7.9	569	0.9	653	1.2
Elementary occupations	7,966	11.4	7,260	12.1	5,862	8.8	4,085	7.5

Census 2011 data analysis – Policy and Partnerships 2012

### Context

- Women are under represented in manufacturing and construction, transport and storage jobs and over represented in education, human health and social work activities
- A gender based pay gap remains, with women overrepresented in lower paid and part-time professions
- Nine out of ten single parent households are headed by women.

The adoption of the AQAP is likely to have a positive impact of the health of all Lewisham's population. Especially the residents living in Lee Green, and those living in Lewisham Central.

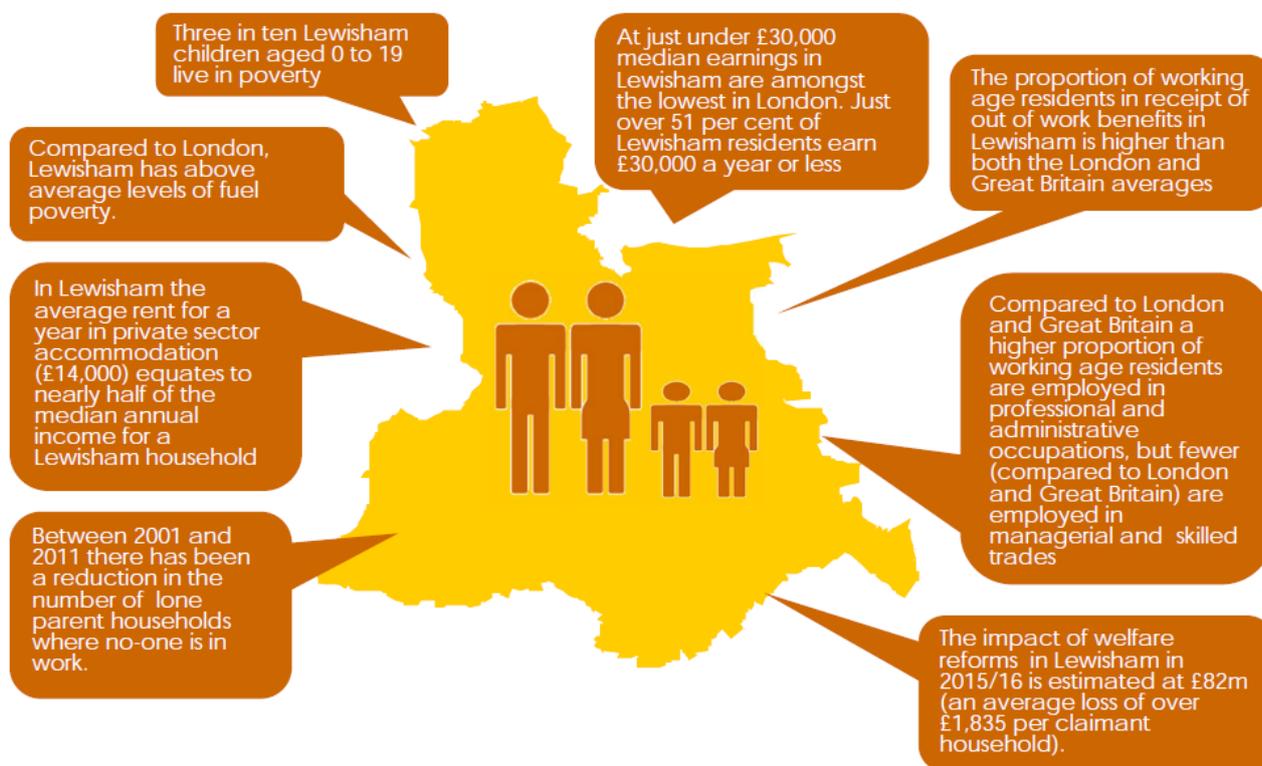
**Conclusions:** The age distribution of the respondents corroborate with the most active group of the population or those most able to use the internet to respond to the consultation. The distribution of the ethnicity is in line with most consultation surveys and suggests the need for the Council to engage with other groups of the population. The results may also be attributed to cultural differences or social and economic inequalities, with the people from Black and Minority Ethnic (BME) backgrounds (which are more impacted by air quality in accordance with recent research), more likely to be interested in meeting their financial and socio-cultural needs than taking part in surveys with others potentially not having English as a first language. The findings related to disability raised the issue of resources needed to better meet the needs of this group. Most respondents were from the Lee Green and Lewisham Central areas, which is representative of the populations most affected by the LTN. The general negative perception of the LTN by this group may have impacted the results of the survey.

The following criteria were not assessed as part of the survey but are likely to influence the measure adopted in the AQAP because poverty and deprivation has been known to be linked to poor air quality.

- Poverty in Lewisham
- Health
- Indices of multiple deprivation
- Life expectancy
- Employment and income
- Indices of multiple deprivation: employment deprivation

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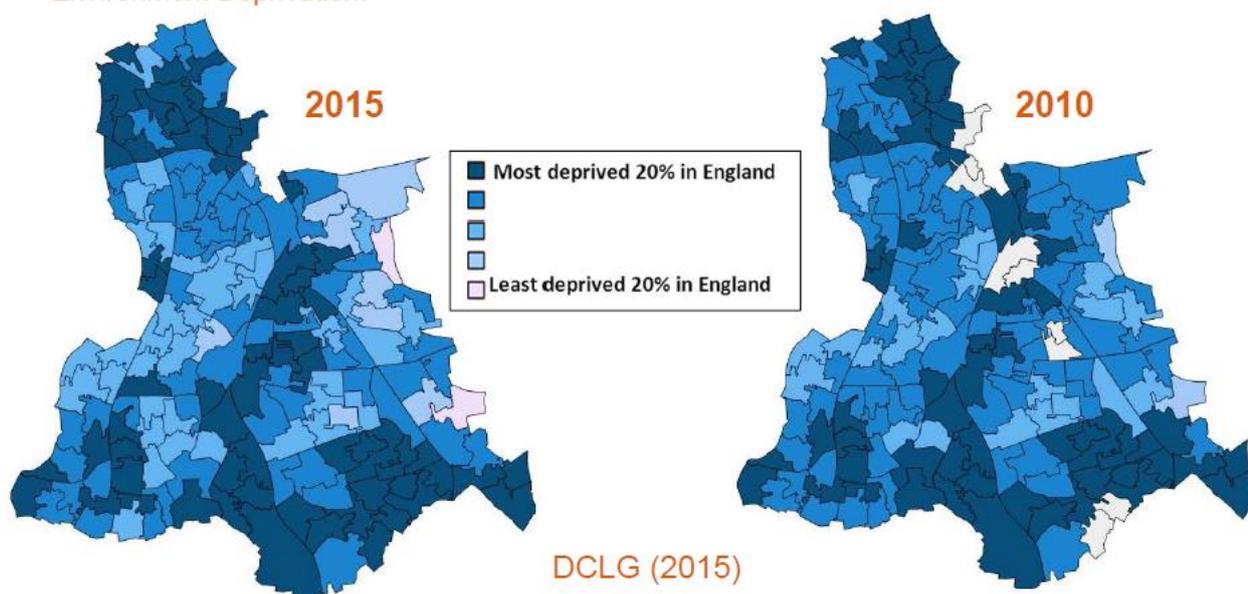
### Poverty in Lewisham



### Indices of multiple deprivation

The Index of Multiple Deprivation (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation, as follows:

- Income Deprivation; Employment Deprivation; The Education, Skills and Training Deprivation; The Health Deprivation and Disability; Crime; Barriers to Housing and Services; Living Environment Deprivation.



### Health

- The gap in life expectancy within Lewisham is increasing.
- Levels of childhood obesity are higher than the England rates - 24.3% of children in year 6 (10-11 year old) identified as obese. Nearly two thirds of adults (61.2%) are overweight and obese, of these 23.7% are obese

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- Only 57.1% of adults (aged 16+) achieve the recommended levels of physical activity and 27.5% are classified as inactive
- Smoking related deaths are higher than the average. Smoking prevalence among routine and manual workers is 30% compared with 21% of the adult population
- Alcohol related hospital admissions are increasing and at a higher rate than England.
- Young women have twice the rate of admissions compared with young men
- An estimated one in three adults admitted to care homes are malnourished or at risk of malnutrition
- Care of people with long term conditions accounts for 70% of the money spent on health and social care in England.

### Life expectancy

#### Life expectancy

- ➔ Lewisham's Health and Wellbeing Strategy sets out the borough's strategic approach to addressing health inequalities
- ➔ By tackling health inequalities, the Council and its partners are able to make an important contribution to increasing life expectancy for Lewisham residents
- ➔ Early deaths (under 75) due to cancer, cardiovascular disease and chronic obstructive pulmonary disease are the main contributors to the gap in life expectancy between Lewisham and England
- ➔ Life expectancy varies in different parts of Lewisham. There is more than a seven year difference in mortality between women and almost an eight year difference in Women. Public Health England, 2015
- ➔ People with mental health disorders and the LGBT community experience disproportionate levels of smoking associated harm since they are more likely to smoke and to smoke more heavily than the general population.

Lewisham Public Health team, 2015

#### Context

- ➔ Life expectancy for men is lower than the England average, but the gap is decreasing for both men and women, whilst the gap within Lewisham appears to be increasing.
- ➔ The average life expectancy for Lewisham males in 2011-13 was 78.7 years against an England average of 79.4 years.
- ➔ The average life expectancy for Lewisham females in 2011-13 was 83.0 years against an England average of 83.1 years.

Lewisham Public Health team, 2015

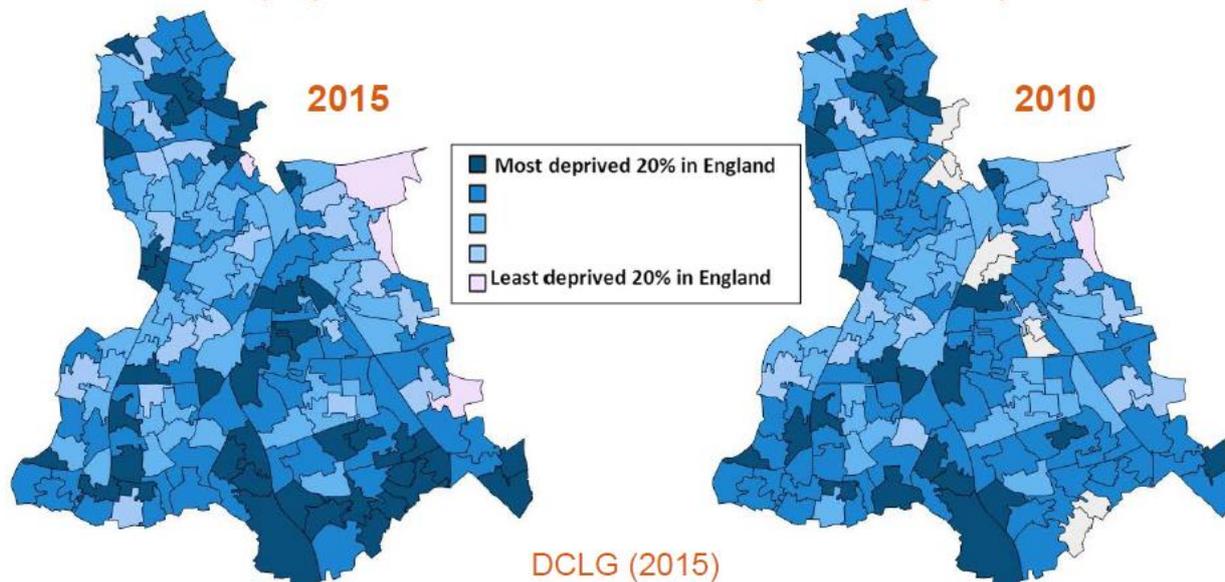
### Employment and income

- Lewisham's working population is younger and more active than the inner London and England averages
- However, unemployment continues to be higher than the London and inner London averages
- Lewisham has high levels of residents with qualifications at level four (degree or equivalent) however there are also just under a fifth of residents with no qualifications
- The distribution of residents with and without qualifications across the borough is uneven.

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### Indices of multiple deprivation: employment deprivation

The Employment Deprivation Domain measures the proportion of the working-age population in an area involuntarily excluded from the labour market. This includes people who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.



#### 4. The analysis

Air quality has a major impact on the health and quality of life of residents and visitors to the borough. Air pollution can have a detrimental effect on people's health, especially our most vulnerable citizens; children, the elderly and people with existing health conditions. The Council has made important strides in improving air quality in the borough in recent years but we know there is more that needs to be done. We want to work with residents, local businesses and our London partners to make Lewisham a cleaner, greener, healthier place to live, work and visit.

The survey carried out as part of the consultation revealed that people from White backgrounds are most likely to contribute to any decision to improve air quality across the borough. The age distribution of the respondents corroborates with the most active group of the population or those most able to use the internet to respond to the consultation. The distribution of the ethnicity is in line with most consultation surveys and suggests the need for the Council to engage with other groups of the population.

Improving air quality is likely to improve the health of the general population but mostly those living in deprived areas and from Black, Asian and Minority ethnic groups. The Equality Impact Analysis shows that the current AQAP measures impact all groups positively overall and in particular the ones that may traditionally suffer from inequalities such as children, young adults, disabled people, pregnant women and young mothers, members of the LGBT community and Black, Asian and Minority ethnic groups. Areas of low employment and income and the most deprived are likely to be affected by poor air quality and most likely to benefit from the AQAP if approved, adopted and implemented.

#### 5. Impact summary and Mitigations

***As detailed in the previous sections, overall, the approval, adoption, publication and implementation of the AQAP is likely to have an overall positive impact on equality and reduce the health gap between the most vulnerable and the poorest in Lewisham and London in general.***

Members of the public see a number of benefits as a result of an AQAP, including a reduction in vehicle and industrial emissions. Such perceptions may also go wider to include, for example, noise and road safety benefits. The general public perception is that some nuisance issues will be dealt with in the AQAP.

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- In communication about the LBL AQAP to the public, LBL are emphasising the wider quality of life benefits as well as the air quality and health benefits.
- LBL will also emphasise on the positive aspects of the AQAP in terms of peripheral benefits.
- We will raise awareness and promote air quality to encourage active travel to improve wellbeing and the health of its residents.

The perceptions of four groups have been considered: the public, industry and commerce, politicians and other local authority functions and regulators combined with non-Air Quality Impacts of this plan. Perceptions of air quality problems and their solutions may have a significant Impact on how successful and effective the AQAP will be. In addition, measures proposed are practicable for the various circumstances of the LBL. Just how practicable the proposed measures within the Action Plan are, may or may not be linked with the perceptions of these measures by the public, politicians, industries and commerce, stakeholders and LBL generally. The practical implications for a number of mitigating measures have been considered. Actions to mitigate negative responses from the variety of stakeholders will be considered and reviewed, and suitably practicable actions adopted as detailed in the following section.

Having developed an air quality action plan or strategy, LBL have considered options for the achievement of the air quality objective(s) in question. In assessing these options and identifying potential mitigating measures, it was important for LBL to consider the socio-economic and wider environmental impacts from the options and measures, where possible. This will contribute to our achievement of sustainable development objectives, and will assist with the emerging development of community strategies for promoting improvements in the social, economic and environmental well-being of residents in Lewisham. Possible impact and mitigations measures are described below.

Impacts	Description	The key action points for mitigation
Socio-Economic Impacts	Socio-economic impacts may occur where local business and industry is affected by certain measures proposed (either directly or indirectly through changes in transport provision). In addition, some initiatives such as the LTN and ULEZ, may impact upon lower socio-economic groups to a greater extent, which may not be socially acceptable.	<ul style="list-style-type: none"> <li>• We will continue liaising with communities likely to be affected so as to assess the likely impact of the options proposed, using techniques such as surveys, public meetings and focus groups, and consult with Community Officers as appropriate.</li> <li>• Consider the use of techniques as applied in Social Impact Assessments (SIAs) during the course of the plan.</li> <li>• Ensure that the action plan is complementary to any emerging Community Strategies and Sustainability Strategies.</li> <li>• Ensure that particular sectors or social groups are not unfairly penalised by the actions proposed within this plan</li> </ul>
Climate Emergency Action Plan change	Our 2020 Climate Emergency Action Plan is closely associated with LAQM policy. This sets out the Council's ambition for Lewisham to be a carbon neutral borough by 2030. Many measures to reduce CO <sub>2</sub> emissions will also deliver other benefits including improvements in air quality. However, some measures to secure local air quality improvements can result in an overall increase in CO <sub>2</sub> emissions, e.g. promoting public transport.	<ul style="list-style-type: none"> <li>• We will assess the impacts of each proposed measure, and group of measures, with regard to any potential increase in CO<sub>2</sub> emission, which may compromise future objectives of the Climate Emergency Action Plan.</li> </ul>
Change in Transport Strategy and Local	Change in Transport Strategy and Local Implementation Plan and Air Quality Action Plans will all have a significant bearing on each other. Every	<ul style="list-style-type: none"> <li>• We will ensure that subsequent submissions of the plan contain policies to improve air quality, particularly in relation to sensitive receptors and designated AQMAs.</li> </ul>

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Implementation Plan 2019-2041	<p>effort has been made to ensure that measures proposed in the Plans complement those in the AQAP. Conversely, Action Plans should be checked to ensure that they will not adversely affect the aims and objectives of Transport Plans.</p>	<ul style="list-style-type: none"> <li>• This is addressed through the annual progress reports submitted in July each year.</li> <li>• We are promoting policies that will advance a modal shift from private vehicle to public vehicle use.</li> <li>• We encourage the implementation of Travel Plans.</li> </ul>
Noise	<p>LBL to carry out an Assessment and Management of Environmental Noise. When implemented this will require an assessment of noise in major urban areas, and from major roads, airports and railways, through noise mapping.</p> <p>This will lead to the development of noise action plans; local authorities should consider what such an action plan might be and balance that against any Air Quality Action Plan.</p>	<ul style="list-style-type: none"> <li>• We will ensure that measures in the AQAP do not adversely impact on noise levels, and that they will complement any future noise strategy.</li> </ul>
Waste Management	<p>The resultant waste management strategies may impact on AQAPs and vice versa especially in AQMAs.</p>	<ul style="list-style-type: none"> <li>• We will encourage and promote policies that seek to reduce traffic related impacts from waste transfer activities (waste traffic movements, dust re-suspension).</li> <li>• We will ensure that measures in the AQAP complement those in the Waste Strategy</li> <li>• and vice versa, for example in relation to siting of waste management facilities.</li> </ul>
Non Air Quality Impacts	<p>Other potential non air quality impacts could include safety issues (road and personal safety), land-use development issues, financial implications, potential for increased Nuisance (e.g. noise), accessibility and visual amenity.</p>	<ul style="list-style-type: none"> <li>• Consult widely with interest groups, the community, political decision makers and other stakeholders on specific measures and their potential impacts from the outset and use all the guidance available to us.</li> </ul>
Perception by Industry and Commerce	<p>In the main, industry and commerce will perceive Air Quality Action Plans as an increased cost base for their business, unless offset by some other benefit. For example, a transport manager may feel negative about the cost of either retrofitting his fleet with low emission technology or replacing some of the vehicles with low emission types unless the spin-off is significant, e.g. priority access into central areas, reduced cost of vehicle excise licence etc.</p>	<ul style="list-style-type: none"> <li>• LBL will have to promote the AQAP through the positive aspects with the industry in question, for example positive consequences for the public relations of the company if it is seen to be 'green'.</li> <li>• LBL will consider persuading companies that the health and well-being of their staff and the quality of the local environment in an AQMA should have a positive effect on recruitment and retention.</li> </ul>
Perception by Politicians:	<p>Politicians will be looking at the balance between desirability and benefits of the schemes compared with public acceptance and support for them.</p>	<p>We have carried out the following actions:</p> <ul style="list-style-type: none"> <li>• Examine the political acceptability of each proposed measure and stress positive aspects.</li> </ul>

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		<ul style="list-style-type: none"> <li>• To ensure that the council is setting a good example by implementing AQAP measures in-house.</li> <li>• Ensure politicians are aware of their legal obligations (i.e. they are required to designate AQMAs and draw up action plans and required to work towards the objectives).</li> </ul>
Perception by Other Authority Functions, Regulators and Agencies	Different authority functions will require AQAP measures to complement and integrate within their specific departmental and corporate programmes and strategies. Good working relationships have been fostered between various LBL departments and external stakeholders.	<ul style="list-style-type: none"> <li>• There are Inter-links with other LBL policies, programmes and strategies within the Action Plan.</li> <li>• Partnership working with other regulators and agencies, such as the Environment Agency, surrounding authorities is an integrated part of the action plan.</li> </ul>
Practicability	It is important that measures proposed in the AQAP are practicable in order to gain the respect and involvement of other stakeholders in the development of the Action Plan or Strategy. The practicability of any single measure, or more usually, group of measures will be dependent not only on the perceptions of the groups outlined above, but also on local circumstances. This may be in relation to economics, geography, politics, the relationships with some of the key stakeholders involved or the presence of other complementary initiatives and measures.	<ul style="list-style-type: none"> <li>• We have and will continue to liaise with all internal and external stakeholders as well as LBL enforcement team for possible breaches.</li> </ul>
<p><b>6. Mitigation</b> As detailed above noted in 5.</p>		
<p><b>7. Key contacts</b></p> <p>Dr Eliane Foteu</p> <p>Environmental Protection Manager Environmental Protection Team Public Realm Housing, Regeneration and Public Realm Lewisham Council</p> <p>Direct line: 020 8314 46265 Mobile: 07834 145099E. <a href="mailto:ElianeScholastiq.foteumadio@lewisham.gov.uk">ElianeScholastiq.foteumadio@lewisham.gov.uk</a> <a href="mailto:EnvironmentalProtection@lewisham.gov.uk">EnvironmentalProtection@lewisham.gov.uk</a></p> <p>-----</p> <p>Dr Catherine Mbema Director of Public Health Public Health Community Services Directorate Lewisham Council</p>		

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<b>Signature of Head of Service</b>	
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# Appendix 3 - Equality Impact Assessment (EqIA)

## Appendix B: Questions

### Equal Opportunities Monitoring

#### Q11. Why are we asking you for this information?

The following monitoring questions help us to be fair and inclusive in the work that we do.

All of these questions are **optional** and you do not have to answer them.

The personal data that you do provide is used to help us understand who is sharing their views and influencing our decision-making, though your identity will remain anonymous.

This data is also used to ensure that nobody is discriminated against unlawfully in the provision of our functions and services.

Any personal data that you choose to share will be treated confidentially in accordance with the General Data Protection Regulations (GDPR).

#### Q12. What is your age?

#### Q13. What is your sex?

- Male                       Female  
 Prefer not to say         Other

#### Q14. What is your ethnicity?

- |  |  |
|--|--|
| <input type="checkbox"/> White - British                   | <input type="checkbox"/> White - Irish                   |
| <input type="checkbox"/> White - Gypsy or Irish Traveller  | <input type="checkbox"/> White - Other                   |
| <input type="checkbox"/> Mixed - White and Black Caribbean | <input type="checkbox"/> Mixed - White and Black African |
| <input type="checkbox"/> Mixed - White and Asian           | <input type="checkbox"/> Mixed - Other                   |
| <input type="checkbox"/> Asian - British                   | <input type="checkbox"/> Asian - Indian                  |
| <input type="checkbox"/> Asian - Pakistani                 | <input type="checkbox"/> Asian - Bangladeshi             |
| <input type="checkbox"/> Asian - Chinese                   | <input type="checkbox"/> Asian - Other                   |
| <input type="checkbox"/> Black - British                   | <input type="checkbox"/> Black - African                 |
| <input type="checkbox"/> Black - Caribbean                 | <input type="checkbox"/> Black - Other                   |
| <input type="checkbox"/> Prefer not to say                 |  |
| <input type="checkbox"/> Other (Please describe below)     |  |

If you have selected 'Other' then please describe your ethnicity in the box below:

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### Q15. Disability

These questions relate to disability. Disability is defined in the law as a physical or mental impairment which has a sustained and long-term adverse effect on a person's ability to carry out normal day to day activities. This includes health conditions such as HIV, cancer and multiple sclerosis.

#### Do you consider yourself to be a disabled person?

Yes  No  Prefer not to say

#### Do you have any access requirements?

Yes  No

If yes, please describe

### Q16. What Ward do you live in?

- |   |                                     |                                       |   |
|---|-------------------------------------|---------------------------------------|---|
| <input type="checkbox"/> Bellingham     | <input type="checkbox"/> Blackheath | <input type="checkbox"/> Brockley     | <input type="checkbox"/> Catford                  |
| <input type="checkbox"/> Crofton Park   | <input type="checkbox"/> Downham    | <input type="checkbox"/> Evelyn       | <input type="checkbox"/> Forest Hill              |
| <input type="checkbox"/> Grove Park     | <input type="checkbox"/> Ladywell   | <input type="checkbox"/> Lee Green    | <input type="checkbox"/> Lewisham Central         |
| <input type="checkbox"/> New Cross      | <input type="checkbox"/> Perry Vale | <input type="checkbox"/> Rushey Green | <input type="checkbox"/> Sydenham                 |
| <input type="checkbox"/> Telegraph Hill | <input type="checkbox"/> Whitefoot  | <input type="checkbox"/> Don't know   | <input type="checkbox"/> I don't live in Lewisham |

### Thank you for taking part in this survey

More print copies of this consultation document are available at Lewisham, Deptford and Downham libraries. You can also request a print copy by emailing your name and address to:

[EnvironmentalProtection@lewisham.gov.uk](mailto:EnvironmentalProtection@lewisham.gov.uk)

You must submit your completed questionnaire no later than Tuesday 28 September 2021.

Copies of this consultation document can be collected from, and returned to, Lewisham, Deptford, or Downham libraries.

Alternatively you can post the completed document to:

London Borough of Lewisham, Environmental Protection, 9 Holbeach Road, Catford SE6 4TW