

Cambridge City Council Equality Impact Assessment (EqIA)

This tool helps the Council ensure that we fulfil legal obligations of the [Public Sector Equality Duty](#) to have due regard to the need to –

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Guidance on how to complete this tool can be found on the Cambridge City Council intranet. For specific questions on the tool email Helen Crowther Equality and Anti-Poverty Officer at equalities@cambridge.gov.uk or phone 01223 457046.

Once you have drafted the EqIA please send this to equalities@cambridge.gov.uk for checking. For advice on consulting on equality impacts, please contact Graham Saint, Strategy Officer, (graham.saint@cambridge.gov.uk or 01223 457044).

1. Title of strategy, policy, plan, project, contract or major change to your service
Consultation on the Expansion of the Smoke Control Area (SCA)

2. Webpage link to full details of the strategy, policy, plan, project, contract or major change to your service (if available)
Browse meetings - Environment and Community Scrutiny Committee - Cambridge Council

3. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?
Cambridge City Council has a responsibility under LAQM to monitor air quality in its district and identify actions to deliver continued air quality improvements, including how we can help meet national targets for PM _{2.5} . Solid Fuel Burning is the largest single source of PM _{2.5} accounting for 40% of all PM _{2.5} emissions in Cambridge.

Domestic Burning is the largest source in the city and continues to increase due to the growing trend for wood burning stoves. Review of existing SCA's as a mechanism for reducing PM_{2.5} emissions is an action for Local authorities within the National Air Quality Strategy.

Legislation to control emissions from solid fuel burning is the Clean Air Act 1993 and the use of Smoke Control areas (SCA); a designated area where the emission of smoke is not permitted. You can burn inside a SCA, but either smokeless fuel or a DEFRA approved appliance must be used. In Cambridge we currently have three SCA's which were introduced in the 1960's and 1970's. The existing SCA's provide limited control on emissions from solid fuel burning due to the limited geographical area.

The amendments to the Environment Act (2021) allowed the scope of the SCA to be expanded to include permanent moored vessels following a period of consultation. Of the complaints received by Environmental Health pertaining to smoke pollution we receive a disproportionate amount related to smoke from permanent moored vessels, despite the small number that exist. It therefore makes sense to consider the inclusion of moored vessels should amendments to the SCA be made.

It is acknowledged that amendments to the scope of the SCA will potentially impact some residents. Cambridge City Council therefore commissioned an independent report to assess the environmental, health and socio economic impacts of expanding the SCA city wide. The report recommends the expansion of the SCA including permanent moored vessels.

Based on these recommendations we are looking to carry out a consultation only at this stage to gauge public opinion and identify any potential areas that may need further consideration should the council choose to proceed

4. Responsible Team and Group

Environmental Health

5. Who will be affected by this strategy, policy, plan, project, contract or major change to your service? (Please tick all that apply)	<input checked="" type="checkbox"/> Residents <input type="checkbox"/> Visitors <input type="checkbox"/> Staff
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Should the council choose to proceed with the expansion of the SCA those impacted will be predominantly Cambridge City residents and businesses, with the potential to also include permanent moored vessels (of which there are approximately 70 registered). **Please note this is only a consultation at this stage**

6. What type of strategy, policy, plan, project, contract or major change to your service is this?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Major change <input type="checkbox"/> Minor change
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7. Are other departments or partners involved in delivering this strategy, policy, plan, project, contract or major change to your service? (Please tick)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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Whilst Environmental Health will be responsible for developing and delivering the consultation we will be seeking support from other council departments to assist with engagement including the Comms team, recreation (engagement with moored vessel owners) and communities (to assist with reaching key community groups)

8. Has the report on your strategy, policy, plan, project, contract or major change to your service gone to Committee? If so, which one?

The request to carry out a consultation on the expansion of the SCA (with the potential to include permanent moored vessels) will be put forward for approval at the September 2024 Environmental and Community Scrutiny Committee.

9. What research methods/ evidence have you used in order to identify equality impacts of your strategy, policy, plan, project, contract or major change to your service?
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Smoke Control Impact Study 2024
 Cambridge City Council commissioned an independent report 'Smoke Control Area Impact Study 2024' produced by Logika Group and dated 28th August 2024 to assess the effects of amending the SCA in Cambridge to cover the whole of the city .it considered both the inclusion and exclusion of permanent moored vessels in terms of changes in pollution emissions, health & socio economic impacts.

Residential emissions are the largest single source of PM_{2.5} emissions in Cambridge with the majority of properties currently outside the SCA. Moored vessels represent a much smaller contribution to overall emissions, and current assumptions are that most are already burning MSF which is compliant under SCA rules, meaning they would not need to change their behaviour.

The report concluded that any changes to widen the scope of the SCA would provide a net benefit to society from health improvements due to reduced air pollution and greenhouse gas emissions, with these benefits outweighing the combined costs. Costs include, cost to home and vessel owners of switching fuel or upgrading stove and cost to council for implementation and enforcement.

The impact on individuals was considered as part of the socio economic study. Very few residents are solely dependent on solid fuel for heating and hot water, with changes impacting those that use wood burning stoves for pleasure or to subsidise other forms of central heating. However, this is not the case for moored vessel owners who are more dependent on solid fuel. Evidence suggests that this group may have lower incomes and be more vulnerable. Where moored vessel owners are not compliant with SCA rules further support may be required.

The report recommends the expansion of the SCA to cover the whole city including moored vessels however, recommends further engagement with vessels owners given the increased potential vulnerability of this group. Should changes to the SCA be implemented it should be accompanied by a robust awareness raising campaign.

Other Evidence

- [Public Health Outcomes Framework - Data - OHID \(phe.org.uk\)](https://phe.org.uk)
- [Committee on the Medical Effects of Air Pollutants \(COMEAP\): 2022 Annual Report \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
- 'State of the city Report' (www.cambridge.gov.uk/state-of-the-city)
- Census 2021 and Joint Strategic Needs Assessment data - [Cambridgeshire & Peterborough Insight – Welcome to Cambridgeshire & Peterborough Insight \(cambridgeshireinsight.org.uk\)](https://cambridgeshireinsight.org.uk).
- [The Health Of People From Ethnic Minority Groups In England | The King's Fund \(kingsfund.org.uk\)](https://kingsfund.org.uk)
- [UK Poverty 2024: The essential guide to understanding poverty in the UK | Joseph Rowntree Foundation \(jrf.org.uk\)](https://jrf.org.uk)

10. Potential impacts

For each category below, please explain if the strategy, policy, plan, project, contract or major change to your service could have a positive/ negative impact or no impact. Where an impact has been identified, please explain what it is. Consider impacts on service users, visitors and staff members separately.

(a) Age - Please also consider any safeguarding issues for children and adults at risk

13.5% of Cambridge City population is under 15 years old with 11.4% of the population over 65 years old (Census 2021).

Potential Impact of consultation

A potential barrier exists in the older population for accessing information and services through online platforms and social media. Research shows that older adult can be digitally excluded ([Internet users, UK - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)).

Awareness raising and accessing information by the public is one of the key priorities for the delivery of the consultation. We will need to ensure that older adults are targeted as part of the promotion campaign. We intend to have hard copies available in key locations, are looking at options for how customer services can assist, drop in session where an officer is available to assist with completions if required plus providing information at groups that older adults attend. We will ensure that we consider all forms of communication in order to access all ages of society.

Potential Impact of SCA Expansion

There is clear evidence that PM_{2.5} (particulate matter smaller 2.5 micrometres) has a significant impact on human health, including premature mortality, allergic reactions, and cardiovascular diseases, with even low concentrations of pollutants likely to be associated with adverse effects on health. All ages are impacted by poor air quality, but the young and the old are the most vulnerable. Older adults are also more sensitive to air pollution leading to the need for increased care, including hospitalisation.

Taking this into consideration if the proposals to expand the SCA were taken forward it would have a positive impact on children aged under 15 years old and adults aged 50 or over which represents approximately 38.7% of Cambridges population.

The impact study report confirmed that limited residents are dependent on solid fuel as a primary source of heating and hot water, with changes unlikely to impact young and old disproportionately however, the report identified permanent moored vessel residents are more likely to be dependent on solid fuel and likely to be more vulnerable (more likely to be older, have a disability or long term health condition). Therefore, should plans for the extension go ahead mitigation will need to be in place to support older adults identified as being dependent on sold fuel and not compliant with SCA requirements.

Positive Impact: Health benefits because of the resultant improvements in air quality and reduction in exposure to pollution

Potential Negative Impact: Research suggests that older adults are more likely to be digitally excluded. When promoting the consultation we will need to consider this group and ensure they are targeted. Should the expansion proceed and reliance on solid fuel as a primary source of heating and hotwater identified additional support may be required

(b) Disability

In the 2021 census a total of 6.2% of Cambridge City residents are living with a disability that limits day to day activities a lot and 10.5% are living with a disability that limit their day to day activities a little.

Potential Impact of ConsultationA potential barrier exists for those with a disability accessing information and services through online platforms and social media. Research shows that people with a disability can be digitally excluded [Exploring the UK's digital divide - Office for National Statistics \(ons.gov.uk\)](#). Awareness raising and accessing information by the public is one of the key priorities for the delivery of the consultation. We will need to ensure that those with a disability are targeted as part of the promotion campaign. We intend to have hard copies available in key locations, are looking at options for how customer services can assist, drop in session where an officer is available to assist with completions if required plus providing information across a range of community groups settings.

Potential Impact of SCA ExpansionAll members of this group would benefit from the health benefits offered from improved air quality. Improved air quality can prevent exacerbation of certain existing conditions for example those who have existing heart and lung conditions are more sensitive to air pollution leading to the need for additional medical care including hospitalisation. This group would disproportionately benefit from the amendments to the SCA were it to go ahead.

On the other hand the Canal and River Trust 2022 Census¹² found that 33.7% of boaters report that their day-to-day activities are limited because of a long-term health problem or disability, which is significantly higher than the national average (17.8%). Disabled people are more likely to experience poverty ([UK Poverty 2024: The essential guide to understanding poverty in the UK | Joseph Rowntree Foundation \(jrf.org.uk\)](#)) and have higher living costs relating to their disability ([Disability Price Tag 2023: the extra cost of disability | Disability charity Scope UK](#)). Therefore, the cost of replacing wood burners may have a disproportionately negative impact. Therefore, should plans for the extension go ahead mitigation will need to

be in place to support disabled people identified as being dependent on solid fuel and not compliant with SCA requirements.

Positive Impact: Health benefits because of the resultant improvements in air quality and reduction in exposure to pollution

Potential Negative Impact: Research suggests that people with a disability are more likely to be digitally excluded. When promoting the air quality agenda we will need to consider this group and ensure they are targeted. Should the expansion proceed and reliance on solid fuel as a primary source of heating and hotwater identified additional support may be required

(c) Gender reassignment

No negative impact has been identified specific to people with this protected characteristic at either the consultation or implementation stage although all members of this group would benefit from the health benefits offered from improved air quality.

No Impact predicted

(d) Marriage and civil partnership

No negative impact has been identified specific to people with this protected characteristic at either the consultation or implementation stage although all members of this group would benefit from the health benefits offered from improved air quality.

No Impact predicted

(e) Pregnancy and maternity

There were 1,293 live birth to people in Cambridge City in 2021 (JSNA 2023). Exposure to air pollution is linked to premature birth, still birth and organ damage during development. The proposal will improve air quality across the city with positive impacts in terms of pregnancy and maternity.

No negative impact was identified at either the consultation or implementation phase. All people with this protected characteristic would benefit from the health benefits offered from improved air quality

Positive Impact: Health benefits because of the resultant improvements in air quality and reduction in exposure to pollution

(f) Race – Note that the protected characteristic ‘race’ refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

Approximately half (53%) of the respondents to the 2021 census in Cambridge City described themselves as White British. The remainder is made up of black and ethnic groups with the largest group Other white (21.5%) followed by Asian, Asian British or Asian Welsh (14.8%).

Potential Impact of Consultation As part of the consultation we will look into ensuring that the option for translation should it be required will be investigated. Further discussions with colleagues in other departments of the council is required to understand if this will be required.

Potential Impact of SCA Expansion City wide improvements to air quality will benefit all people living in the city, including a high proportion of the population from ethnic minority backgrounds. This could be important as UK-wide research shows that there are health inequalities between ethnic minority and white groups, and between different ethnic minority groups – and air pollution can exacerbate some existing health conditions.

Potential Impact: To ensure accessibility of the consultation to all residents of Cambridge further consideration is required on how we ensure translation of the consultation is available if required

Positive Impact: If the expansion to the SCA were to go ahead health benefits because of the resultant improvements in air quality and reduction in exposure to pollution

(g) Religion or belief

No negative impact has been identified specific to people with this protected characteristic although all members of this group would benefit from the health benefits offered from improved air quality.

No Impact Predicted

(h) Sex

No negative impact has been identified specific to people with this protected characteristic although all members of this group would benefit from the health benefits offered from improved air quality.

No Impact Predicted

(i) Sexual orientation

No negative impact has been identified specific to people with this protected characteristic although all members of this group would benefit from the health benefits offered from improved air quality.

No Impact Predicted

(j) Other factors that may lead to inequality – in particular, please consider the impact of any changes on:

- **Low-income groups or those experiencing the impacts of poverty.**
- **People of any age with care experience – this refers to individuals who spent part of their childhood in the care system due to situations beyond their control, primarily arising from abuse and neglect within their families. The term “Care experience” is a description of a definition in law, it includes anyone that had the state as its corporate parent by virtue of a care order in accordance with the Children Act 1989 and amendments.**
- **Groups who have more than one protected characteristic that taken together create overlapping and interdependent systems of discrimination or disadvantage. (Here you are being asked to consider intersectionality, and for more information see: https://media.ed.ac.uk/media/1_I59kt25q).**

Low Income Groups – No impact has been identified at the consultation stage. One of the key aims of the SCA Impact Study was to identify whether residents in Cambridge are solely dependent on solid fuel for the provision of heating and hotwater and whether any changes to the SCA would have a disproportionate impact on those with lower income. With the exceptions of permanently moored vessel residents this is not the case with solid fuel stoves used predominantly for pleasure or as a secondary source of heating. Therefore should the expansion of the SCA proceed the changes are not expected to disproportionately impact those on low income.

Permanently Moored Vessel Residents – The report identified that this group is more likely to have a protected characteristic and further work is required should the council decide to progress with the expansion of the SCA. As part of the

consultation we will be targeting this group with plans to approach and interview all residents of which there are approximately 70. This will ensure we have a clear understanding of the potential impacts on this group and options for mitigation should the council chose to proceed. The EqIA shall be updated following the consultation.

People of any age with care experience - No impact identified for people with Care Experience at either the consultation or implementation stages

Groups who have more than one protected characteristic - Where one of the protected characteristics is age or disability then positive and negative impacts as identified above will apply however, it is not envisaged that there will be a cumulative impact for those with more than one protected characteristic. If people have some long-term health conditions as well as well as being children, older age, or pregnant then impacts of poor air quality can be exacerbated as increased vulnerabilities.

11. Action plan – New equality impacts will be identified in different stages throughout the planning and implementation stages of changes to your strategy, policy, plan, project, contract or major change to your service. How will you monitor these going forward? Also, how will you ensure that any potential negative impacts of the changes will be mitigated? (Please include dates where possible for when you will update this EqIA accordingly.)

Following the completion of the 'SCA Impact Study' the consultation is the next phase in research and data gathering. The consultation will be completed alongside a robust awareness raising campaign to increase wider understanding amongst the general public not only on the potential implications of such changes to them as residents but also the health and environmental benefits that 'Better Burning' can bring. Promotion and awareness raising will be targeted at key groups across the community including those with protected characteristics. Once the consultation is completed all information will be collated. Should we opt to proceed with the recommendation to expand the SCA this will return to committee for approval. A new Equality Impact Assessment would be developed at this stage.

12. Do you have any additional comments?

[Click here to enter text.](#)

13. Sign off

Name and job title of lead officer for this equality impact assessment: Elizabeth Bruce, Scientific Officer

Names and job titles of other assessment team members and people consulted: Helen Crowther, Equality & Anti Poverty Officer; Yvonne O'Donnell, Environmental Health Manager; Jo Dicks, EQG Team Manager

Date of EqlA sign off: 9th September 2024

Date of next review of the equalities impact assessment: N/A

Date to be published on Cambridge City Council website: 11th September 2024

All EqlAs need to be sent to the Equality and Anti-Poverty Officer at equalities@cambridge.gov.uk