

## 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](mailto:equalities@cambridge.gov.uk) or phone 01223 457046.

Once you have drafted the EqIA please send this to [equalities@cambridge.gov.uk](mailto:equalities@cambridge.gov.uk) for checking.

<b>1. Title of strategy, policy, plan, project, contract or major change to your service</b>
<b>Expansion of the Smoke Control Area to cover the whole city (excluding permanent residential moored vessels)</b>

<b>2. Webpage link to full details of the strategy, policy, plan, project, contract or major change to your service (if available)</b>
: <a href="#">Agenda for Cabinet on Tuesday, 24th June, 2025, 5.00 pm - Cambridge Council</a>

<b>3. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?</b>
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 <sub>2.5</sub> . Solid Fuel Burning is the largest single source of PM <sub>2.5</sub> accounting for 40% of all PM <sub>2.5</sub> 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 <sub>2.5</sub> 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 expansion of the SCA will enable emissions from solid fuel burning to be managed under a single piece of legislation. All new stoves installed will be DEFRA exempt, and sale of fuels within the city will need to meet SCA requirements helping drive a reduction in emissions. The same rules will apply to all residents and businesses and with tailored education and awareness raising about 'better burning' will help embed attitudes to burning and lead to further reductions in emissions. Where smoke complaints are received they can be managed under a single piece of legislation providing clarity to all residents and businesses. Any response to complaints be reasonable and proportionate focussing again on education as opposed to enforcement. will A reduction in PM<sub>2.5</sub> emissions will lead to improvements in health for all residents and visitors to the city.

#### 4. Responsible Team and Group

Environmental Health, Communities Group

**5. Who will be affected by this strategy, policy, plan, project, contract or major change to your service?**  
(Please tick all that apply)

- ☒ Residents
- ☒ Visitors
- ☒ Staff

The expansion of the SCA would predominantly affect Cambridge City residents and businesses who may be required to adapt how they burn solid fuel within their home or business. However, any improvements in air quality following changes will offer health benefits to residents, visitors and staff.

**6. What type of strategy, policy, plan, project, contract or major change to your service is this?**

- ☐ New
- ☒ Major change
- ☐ Minor change

**7. Are other departments or partners involved in delivering this strategy, policy, plan, project, contract or major change to your service? (Please tick)**

☐ Yes  
☒ No

Environmental Health will be responsible for implementing the changes, however we will continue to work closely with the comms team to disseminate information about these changes and raise awareness.

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

Permission to proceed with a public consultation on proposals to expand the SCA with scope to include permanent residential moored vessels was agreed at the Environment & Community Scrutiny Committee on 26<sup>th</sup> September 2024. The consultation ran for 12 weeks between 26<sup>th</sup> January and 20<sup>th</sup> April 2025. Following analysis of responses, wider engagement with the boating community alongside wider research, the request to expand the SCA to cover the whole city, but exclude permanent residential moored vessels will be put forward at the June Cabinet.

**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?**

**Public Consultation**

772 responses were received online via the Citizen Lab portal with an additional 4 submitted in hard copy totalling 776 responses. The consultation was widely promoted across various platforms to maximise visibility, which is represented in the good response rate received. The consultation focussed not only on views about the proposal to expand the SCA (with the option to include permanent residential moored vessels) but also wider questions on what heating is used, access to alternatives and motivations for burning solid fuel. The findings of the consultation support the findings in the Smoke Control Impact Study that with the exception of boat owners most residents and businesses are not solely dependent on solid fuel burning, but that it is a choice. Approximately 55% of respondents support the expansions, 40% of respondents disagree and 5% neither agree or disagree.

**Boat Owners Engagement**

In parallel to the wider consultation, boat owners were also encouraged to respond to a separate questionnaire and follow up interviews were carried out to try and gain a better understanding on the impact any changes in the SCA would have on this community. There are 70 licenses issued for permanent residential moored vessels. Just under a 50% response rate was received (32/70), although following subsequent work it is believed some of the boats are vacant so this response rate could be higher. The findings from the survey

supported the Smoke Control Impact Study confirming that this group has above average protected characteristics, most notably older age groups, disability and low income.

### **Smoke Control Impact Study 2024**

Cambridge City Council commissioned an independent report 'Smoke Control Area Impact Study 2024' produced by Logika Group and dated 28<sup>th</sup> 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<sub>2.5</sub> 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 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 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.

### **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](https://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)

## 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).

There is clear evidence that PM<sub>2.5</sub> (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.

These proposals will help drive improved air quality, most notably a reduction in PM<sub>2.5</sub> emissions having 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. These findings were supported by the wider consultation. Responses to the wider consultation included a wide cross section of ages with those over 65 being the most well represented group and under 24 least represented of those that chose to confirm age. (approximately 50% of respondents).

The wider engagement work with the boating community further supported the findings of the Smoke Control Impact Study and wider consultation confirming that 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) with the main age group of those living on boats to be between 50 and 69. No one younger than the 30-49 age group responded to the survey although one parent of young children took part in one of the follow up interviews.

Based on the supporting evidence we have opted to exclude permanent residential moored vessels from the recommendation to expand the smoke control area. Continued engagement is recommended to identify practical ways to help move residents away from solid fuel burning as it is also recognised that there is a disproportionate negative impact on health due to poor air quality, from solid fuel burning in confined spaces.

Should the expansion proceed there will be an education and promotional campaign about the changes and implications for residents. The follow up to complaints will be reasonable and proportionate and centre around education and awareness raising. 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/peoplepopulationandcommunity/healthandsocialcare/conditionsandstates/articles/internetusersuk/2019)). We will need to ensure that older adults are targeted as part of the promotion campaign. Regular articles in Cambridge Matters, and targeted visits and communications including older peoples networks and community groups will help reach this core group..

**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 changes we will need to consider this group and ensure they are targeted so they understand the implications of the proposed changes.**

## **(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.

All members of this group would benefit from the health benefits offered from improved air quality. Although it is the case that 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 Census<sup>12</sup> 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%). Moreover, disabled people are more likely to experience poverty ([UK Poverty 2024: The essential guide to understanding poverty in the UK | Joseph Rowntree Foundation \(jrf.org.uk\)](https://jrf.org.uk/uk-poverty-2024/)) and have higher living costs relating to their disability ([Disability Price Tag 2023: the extra cost of disability | Disability charity Scope UK](https://disabilitycharity.org.uk/disability-price-tag-2023/)). Wider engagement with the boating community found that 43.33% of respondents stated that they had a condition that impacts their ability to carry out day-to-day activities at least a little. There is the potential that changing the SCA requirements to include the boating community may have a disproportionately negative impact. Insufficient respondents chose to complete this question on the wider consultation to draw any conclusions.

Should the expansion proceed there will be an education and promotional campaign about the changes and implications for residents. A 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 \(ons.gov.uk\)](https://ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/conditionsandstates/articles/exploringtheuksdigitaldivide/2019)). We need to ensure that members of the community with a disability are targeted as part of this campaign. Regular articles in Cambridge Matters, and targeted visits and communications to community groups and

centres will help reach this core group. Information in alternative formats can be provided on request.

**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 changes we will need to consider this group and ensure they are targeted so they understand the implications of the proposed changes.**

#### **(c) Gender reassignment**

No negative impact has been identified specific to people with this protected characteristic should the expansion go ahead 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 should the expansion go ahead 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 births 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. 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%).

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.

It is worth noting that of the 67% of respondents who opted to answer the question on ethnic group, 80% classed themselves as white British therefore other groups remain under represented despite wide promotion across a wide range of platforms.

We need to ensure that members of the community for whom English is not their first language can access the information and understand what the changes may mean for them. This will be achieved through targeted communications with key networks and community centres. Information in alternative languages can be provided on request.

**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**

**Potential Negative Impact: Challenge of reaching and effectively communicating the proposed changes to all members of the community whatever their ethnic origins.**

**(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\\_159kt25q](https://media.ed.ac.uk/media/1_159kt25q)).**

**Low Income Groups** – 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. The report found that this is not the case with solid fuel stoves used predominantly for pleasure or as a secondary source of heating, with the exception of permanently moored vessel residents. These findings were further supported by the wider consultation and engagement with the boating community. Based on these findings we have decided not to recommend the inclusion of moored vessels into the remit of the SCA.

**People of any age with care experience** - No impact identified for people with Care Experience

**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 EqlA accordingly.)**

Should cabinet choose to proceed with the recommendation to expand the SCA the procedure of revoking the existing SCA's and then declaring a new city wide SCA is likely to take up to 12 months. For the 12 months leading up to the declaration of the new SCA we will do a targeted promotional campaign to raise awareness about the changes in policy, implications to residents who burn solid fuel but also the benefits of 'better burning' for both health and the environment. Alongside the normal mechanisms for dissemination Promotion and awareness raising will be targeted at key groups across the community including those with protected characteristics as identified above.

**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, Principal Technical 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, Sam Scharf, Communities Director

Date of EqlA sign off: 11<sup>th</sup> June 2025

Date of next review of the equalities impact assessment: June 2026

Date to be published on Cambridge City Council website: 16th June 2025

**All EqlAs need to be sent to the Equality and Anti-Poverty Officer at [equalities@cambridge.gov.uk](mailto:equalities@cambridge.gov.uk)**