

Diversity impact assessment

TITLE Medway Air Quality Action Plan 2025-30
DATE 3 June 2025
LEAD OFFICER Stuart Steed
1 Summary description of the proposed change What is the change to policy / service / new project that is being proposed? How does it compare with the current situation?
<p>Medway has a statutory duty to develop and implement an Air Quality Action Plan (AQAP) to improve air quality within a designated Air Quality Management Area (AQMA). This Action Plan targets the main source of emissions within the Central Medway, Gillingham and Rainham AQMAs, however wider air quality improvements can be expected through implementation of the measures.</p> <p>The measures within the AQAP are designed to reduce the impact from vehicle exhaust emissions by encouraging less use of cars and increased use of more sustainable/cleaner forms of transport, such as public transport, car sharing, electric vehicles, cycling and walking.</p> <p>The pollutant of concern in Medway is nitrogen dioxide. Nitrogen dioxide is known to cause inflammation of the airways, reduce lung function and exacerbate asthma. The UK Parliament's Environmental Audit Committee, estimates that annually 29,000 deaths are caused by particulate air pollution alone in the UK.</p> <p>Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality (AQMAs), are also often the less affluent areas.</p> <p>The measures in the Action Plan will have a positive health benefit for all residents and visitors to Medway, and in particular for children and the elderly who are more susceptible to the effects of higher levels of pollution. The actions are designed to include all sectors of the public that use vehicles. The actions taken will promote equality as all of Medway's residents will benefit from better air quality and health.</p>
2 Summary of evidence used to support this assessment E.g. Feedback from consultation, performance information, service user. E.g. Comparison of service user profile with Medway Community Profile
<p>The Environment Act 1995 requires all local authorities to review air quality within their area. If any air quality objective prescribed by regulations and in the National Air Quality Strategy is unlikely to be achieved, then the local authority must designate the affected areas as an AQMA. The Act then requires an action plan to be produced for these designated areas, setting out the actions that the council intends to take to achieve the air quality objectives.</p>

Diversity impact assessment

In 2004 Medway Council declared six AQMAs and then in August 2010, following further consideration of air quality results, the Council consolidated the existing AQMAs along with newly identified areas into three AQMAs. These areas were designated as Central Medway AQMA, Pier Road, Gillingham AQMA and High Street, Rainham AQMA. An additional AQMA was declared in October 2018 covering parts of Four Elms Hill, Chattenden.

The air quality annual mean objective for nitrogen dioxide is $40\mu\text{g}/\text{m}^3$. This level has historically been exceeded within the AQMAs.

The cause of the high levels is transport, in particular diesel vehicles which generally emit more nitrogen dioxide. So, the action plan will be drawn up in consultation with Transport & Highways, Sustainable Development, Public Health and others.

The range of actions set out in the action plan will be designed to improve air quality and will benefit those living within the AQMA and also the wider population.

INTERNAL CONSULTATION ON DRAFT ACTION PLAN

To assist with development of actions in the AQAP an internal workshop took place on 6 February 2024 to discuss and refine a long list of potential actions to be included. The Medway Council departments/teams who were invited to attend the workshop included:

- Transport and Parking
- Public Health
- Sustainable Transport
- Regeneration
- Licensing
- Public Transport Planning
- Green Spaces and Rights of Way and Access
- Climate Response

Following the workshop and shortlisting, a total of 19 actions have been included in the AQAP, covering the following broad themes:

- Freight and delivery management
- Policy guidance and development control
- Promoting low emission transport
- Promoting travel alternatives
- Public information
- Transport planning and infrastructure
- Traffic management

STATUTORY CONSULTATION ON ACTION PLAN

A statutory consultation was carried out from 16 September-28 October 2024. The consultation was hosted as an online survey accompanied by an instructional video providing an overview of the AQAP itself, the purpose of the consultation, and how to complete the survey. The survey was promoted on the Medway Council website and social media accounts as well as via Medway matters and internal staff communications. Direct emails were also sent to a range of external stakeholders.

Diversity impact assessment

The survey included a number of multiple-choice questions (e.g. agree/disagree) as well as opportunities to submit comments as free text. A total of 80 responses were provided to the survey together with a large number of free text comments. The results of the consultation, survey including responses to some key themes have been included in the AQAP.

Written responses were received from two statutory consultees (DEFRA and the United Kingdom Health Security Agency (UKHSA)). Their comments have been incorporated into the AQAP. DEFRA, responding on behalf of the SoS, have subsequently approved the AQAP.

As well as seeking views on the measures contained within the AQAP, the survey also asked about how the measures may impact upon people with a protected characteristic.

When asked about how the measures presented in the Draft AQAP may impact people with a protected characteristic, or their own day-to-day activities:

- 45% of respondents felt the measures presented in the Draft AQAP may have a positive impact on any group of people with a protected characteristic.
- 25% of respondents felt the measures presented in the Draft AQAP may have a negative impact on any group of people with a protected characteristic.
- 48% of respondents think the measures presented in the Draft AQAP may have a positive impact on their own day-to-day activities.
- 39% of respondents think the measures presented in the Draft AQAP may have a negative impact on their own day-to-day activities.

3 What is the likely impact of the proposed change?

Is it likely to:

Adversely impact on one or more of the protected characteristic groups

Advance equality of opportunity for one or more of the protected characteristic groups

Foster good relations between people who share a protected characteristic and those who don't

(insert Yes when there is an impact or No when there isn't)

Protected characteristic groups (Equality Act 2010)	Adverse impact	Advance equality	Foster good relations
Age	No	Yes	No
Disability	No	Yes	No
Gender reassignment	No	No	No

Diversity impact assessment

Protected characteristic groups (Equality Act 2010)	Adverse impact	Advance equality	Foster good relations
Marriage/civil partnership	No	No	No
Pregnancy/maternity	No	No	No
Race	No	No	No
Religion/belief	No	No	No
Sex	No	No	No
Sexual orientation	No	No	No
Care experience	No	No	No
Other (e.g. low income groups)	No	Yes	No

4 Summary of the likely impacts

Who will be affected?

How will they be affected?

All users of more polluting vehicles will be targeted to encourage less dependence on vehicles, everyone in Medway will benefit from improved air quality, and in particular the young, elderly and all others that suffer from respiratory conditions. In more deprived wards, residents are less healthy than those in more affluent areas, including having worse respiratory health and other health conditions with links to air pollution.

It is not currently thought that any negative impact will be brought on any of the protected characteristic groups.

5 What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?

What alternative ways can the Council provide the service?

Are there alternative providers?

Can demand for services be managed differently?

Delivery of the Action Plan will be dependent on a number of different internal and external organisations working in a co-ordinated way. Overall responsibility for reducing the pollutant levels lies ultimately with the council.

Diversity impact assessment

6 Action plan

Actions to mitigate adverse impact, improve equality of opportunity or foster good relations and/or obtain new evidence

Action	Lead	Deadline or review date

7 Recommendation

The recommendation by the lead officer should be stated below. This may be: to proceed with the change, implementing the Action Plan if appropriate, consider alternatives, gather further evidence

If the recommendation is to proceed with the change and there are no actions that can be taken to mitigate likely adverse impact, it is important to state why.

No further actions are recommended.

8 Authorisation

The authorising officer is consenting that the recommendation can be implemented, sufficient evidence has been obtained and appropriate mitigation is planned, the Action Plan will be incorporated into the relevant Service Plan and monitored

Assistant Director

Date of authorisation