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CORRESPONDENCE FOLLOWING THE COMMITTEE MEETING

Committee ENVIRONMENTAL SCRUTINY COMMITTEE

Date and Time of Meeting TUESDAY, 27 MARCH 2018, 5.00 PM

Please find below correspondence send by the Committee Chair following the meeting, together with any responses received.

For any further details, please contact scrutinyviewpoints@cardiff.gov.uk

55 **Correspondence Following the Committee Meeting** (Pages 3 - 18)

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Ref: RDB/RP/SE.MM.CW/27.03.2018

28 March 2018

Councillors Elsmore, Michael & Wild,
Cabinet Members – Cardiff Council,
County Hall,
Atlantic Wharf,
Cardiff CF10 4UW.



Dear Councillors Elsmore, Michael & Wild,

Environmental Scrutiny Committee – 27 March 2018

On behalf of the Environmental Scrutiny Committee I would like to thank you and the officers for attending the special committee meeting that took place on Tuesday 27 March 2018. As you are aware the meeting received an item titled 'Pre Decision Scrutiny: Air Quality Cardiff'. The comments and observations made by Members following this item are set out in this letter.

Pre Decision Scrutiny: Air Quality Cardiff

- **DEFRA Modelling Data** - During the meeting it was explained that modelling undertaken by DEFRA indicated that Cardiff would be non-compliant beyond 2023 in terms of achieving the EU air quality directive limits, i.e. above the annual average nitrogen dioxide concentration air quality standard of 40 micrograms per cubic metre. The potential breaches were identified along sections of the A48 and A4232; two of the busier routes into and out of the city. A Member asked for confirmation of the values measured for both of these sites, and instead of being provided with actual figures was told that the feasibility study would revisit these values in an effort to establish the current position. The Committee acknowledge the importance of the feasibility study and its role in verifying the DEFRA modelled air quality results, however, they would like confirmation of the DEFRA results for both sites along with details of when the exercise was undertaken, the data sets used to simulate traffic flows and a breakdown of all other assumptions applied to this calculation.

- **Feasibility Study & Procurement Timescales** - Members of the Committee understand the exceptionally tight timescales placed upon the Council for delivering the feasibility study and indeed identifying a plan to achieve air quality compliance in 'the shortest possible time'. Completing the feasibility study by the 30 September is a significant challenge, particularly given that the 'Improving Cardiff's Air Quality' task & finish exercise identified that several comparable cities had taken in excess of two years to complete the same task. Concerns were raised that the short timescale might mean that the exercise is rushed to the potential detriment of achieving the best outcome for Cardiff, and that the formal procurement of an air quality consultant had yet to start. With this in mind I would be grateful if you could provide the Committee with assurance that:

 - The short timescale for delivering the feasibility study will not prevent the Council from achieving the best outcome for Cardiff in terms of achieving air quality compliance 'in the shortest time possible';
 - The time taken to procure a specialist air quality consultant has been built into the six month window for delivering the feasibility study in Cardiff. To support this assurance I would be grateful if you could provide details of the planned procurement timeline.
- **Regional Collaboration** - The Committee welcomes the comments of the Cabinet Member for Strategic Planning & Transport in relation to working with neighbouring local authorities to identify the best solutions for dealing with Cardiff's air quality challenges, and in achieving the widest possible audience for the consultation exercise supporting 'Cardiff's Transport & Clean Air Green Paper'. Members firmly believe that improving air quality and transport solutions is a regional issue that can only truly be achieved through real regional collaboration.
- **Low Emission / Sustainable Fuels** – The Committee welcomes the commitment made by the Cabinet Member for Clean Streets, Recycling & Environment in terms of developing the use of low emission / sustainable fuels in Cardiff. It is clear that the use of low emission vehicles and

sustainable fuel sources will be a major contributing factor in improving Cardiff's air quality. Evidence gathered during the 'Improving Cardiff's Air Quality' task & finish exercise suggests that it is inevitable that this is the future direction of travel for the automotive industry. The Committee encourages you to be bold in your approach and consider all of the potential solutions available, for example, electric and hydrogen powered vehicles. The general view of Members is that there is no single option that will achieve compliance on its own, and that a sensible blend of technologies is the best way forward at this point in time.

- **Electricity Supply** – Several of the Members were a little concerned at the comment made by the Cabinet Member for Clean Streets, Recycling & Environment about the available supply of electricity in Cardiff being potentially insufficient to meet the future demand created by the growth of electric vehicles. If available, I would be grateful if you could provide details of the current electricity supply available to Cardiff; estimates for the increase in electric vehicles in the city and the projected increase in demand for electricity created by the new electric vehicles.
- **Planning Process & Low Emission Vehicle Refuelling Infrastructure** – Several Members were concerned that the new developments identified in the Local Development Plan would be created without providing the low emission vehicle charging infrastructure required to meet Cardiff's air quality challenges. I would be grateful if you could confirm the level of debate taking place between the developers and Council to ensure that low emission charging infrastructure is being built into the major new developments and the actions that have been agreed.
- **Finances** – The Committee welcomes the positive financial statement made in the letter from the Minister for Environment. It is reassuring to know that the Welsh Government is supporting the Council to address this challenge and that they have agreed to support the funding for the feasibility study and implementation of the scheme to be identified for improving Cardiff's air quality. Members are supportive of the Chief

Executives comments in that it is important that we now enter into a productive dialogue with Welsh Government to help achieve the best outcome for Cardiff.

- **Air Quality Compliance & Competing Demands** – The Committee is supportive of the approach being taken by the Council to ensure that air quality targets are met ‘in the shortest time possible’ in order to shape the urban environment in a way that delivers improved health benefits and supports economic growth. Members felt that delivering these outcomes was vitally important in terms of achieving the best long-term outcome for Cardiff.
- **Cardiff’s Transport & Clean Air Green Paper** – Members welcome ‘Cardiff’s Transport & Clean Air Green Paper’ and the consultation exercise that supports this piece of work. The document is well constructed and identifies a number of important ideas that are essential in transforming Cardiff into a modern sustainable travel city. Unfortunately, the timescales for achieving air quality compliance are in very short and some of the more significant projects (for example, the Metro) will be delivered outside of this period. This means that we have to focus on delivering as many of the short term measures within our immediate control as quickly as possible, for example, continued focus on 20 mph zones and parking restriction measures. At the same time we need to ensure that any major transport infrastructure projects due for completion within this timescale are delivered on time.
- **Clean Air Zones – A Temporary Measure** – A Member suggested during the way forward that if Cardiff is mandated to implement a Clean Air Zone then it should explore the option of making it a temporary measure that is only applied until air quality compliance is achieved, i.e. it is possible to reverse the position once the objective is achieved. I would be grateful if this suggestion could be considered and modelled when undertaking the feasibility study and identifying the final plan.

I would be grateful if you would consider the above comments and provide a response to the content of this letter.

Regards,

A handwritten signature in black ink, appearing to read 'Ramesh Patel', with a stylized, cursive script.

Councillor Ramesh Patel

Chairperson Environmental Scrutiny Committee

Cc:

- Councillor Huw Thomas, Leader – Cardiff Council;
- Paul Orders, Chief Executive – Cardiff Council;
- Andrew Gregory, Director of City Operations
- Davina Fiore, Director of Governance & Legal Services
- Members of Cardiff's Environmental Scrutiny Committee

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Fy Nghyf / My Ref: CM39430

Dyddiad / Date: 16th May 2018

Councillor Ramesh Patel
E-Mail

Annwyl/Dear Cllr Patel,

Scrutiny, Environmental Scrutiny Committee – 27 March 2018

Environmental Scrutiny Committee - 27th March 2018

Thank you for your correspondence concerning the above. For clarity I have produced this response in the same order as the questions were asked in your letter:

DEFRA Modelling Data

'During the meeting it was explained that modelling undertaken by DEFRA indicated that Cardiff would be non-compliant beyond 2023 in terms of achieving the EU air quality directive limits, i.e. above the annual average nitrogen dioxide concentration air quality standard of 40 micrograms per cubic metre. The potential breaches were identified along sections of the A48 and A4232; two of the busier routes into and out of the city. A Member asked for confirmation of the values measured for both of these sites, and instead of being provided with actual figures was told that the feasibility study would revisit these values in an effort to establish the current position. The Committee acknowledge the importance of the feasibility study and its role in verifying the DEFRA modelled air quality results, however, they would like confirmation of the DEFRA results for both sites along with details of when the exercise was undertaken, the data sets used to simulate traffic flows and a breakdown of all other assumptions applied to this calculation.'

The work undertaken by Defra is presented in the Detailed and Technical Reports which accompanied the UK national plan to tackle roadside NO₂ concentrations.

Details of which can be found on the following website:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/632916/air-quality-plan-technical-report.pdf

The modelled projections for non-compliance have been done so using the Pollution Climate Mapping (PCM) model. This model maps emissions from the National Atmospheric Emissions Inventory using a deterministic dispersion model to simulate atmospheric mixing and to generate background concentrations for different pollutants. The modelled results are then calibrated against measured concentrations from the national monitoring network and then verified. The new projections use the most recent historical assessment (2015) as the base year. As such, these projections used the

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difference | wahaniaeth

latest available input data including 2015 road transport figures from the Department for Transport (DfT), the 2015 calibration of the PCM model with measurement data from the Automatic Urban and Rural Network (AURN), and the latest emission factors from COPERT 5.¹

The latest PCM modelled projections provided annual average projected NO₂ concentrations for all years from 2017-2030 inclusive.

As stated by DEFRA, the PCM Model has an uncertainty of ± 29 per cent. It does not use local emission factors and a large part of the feasibility study will enable collection of local emission data that can then be used to verify the modelled results. In addition our local air quality monitoring data will also be used, as the model will have only used automatic data captured from the AURN site on Frederick Street. Cardiff Council has recently began monitoring on both the A48 and A4232 for this exact purpose.

The attached table shows the worst projected road network in Cardiff as the A48 which shows non-compliance beyond 2023, taken from the detailed plan produced by Defra. The attached spread sheet provides a breakdown of the source apportionment of pollution in 2020.

Feasibility Study & Procurement Timescales

Members of the Committee understand the exceptionally tight timescales placed upon the Council for delivering the feasibility study and indeed identifying a plan to achieve air quality compliance in 'the shortest possible time'. Completing the feasibility study by the 30 September is a significant challenge, particularly given that the 'Improving Cardiff's Air Quality' task & finish exercise identified that several comparable cities had taken in excess of two years to complete the same task. Concerns were raised that the short timescale might mean that the exercise is rushed to the potential detriment of achieving the best outcome for Cardiff, and that the formal procurement of an air quality consultant had yet to start. With this in mind I would be grateful if you could provide the Committee with assurance that:

☐ *The short timescale for delivering the feasibility study will not prevent the Council from achieving the best outcome for Cardiff in terms of achieving air quality compliance 'in the shortest time possible';*

Although it is paramount that Cardiff Council achieves compliance within the shortest time possible, it is also essential that the solution is the best one for the City and its citizens. A fundamental point is that the Council needs to ensure that any proposals are proportionate to the scale of the problem and tailored to local circumstances, whilst ensuring compliance in the shortest time possible.

As you rightly point out, the timescales given to us are extremely challenging. It is in all of our interests to get this right and as such we wouldn't want to overly commit to hastiness. There has since been constructive dialogue with Welsh Government about "staggering" of different elements that may extend to November. This will give us a better chance of getting the right solution.

☐ *The time taken to procure a specialist air quality consultant has been built into the six month window for delivering the feasibility study in Cardiff. To support this assurance I*

¹ COPERT (Computer Program to calculate Emissions from Road Transport) NO_x emission factors are combined with road traffic numbers to estimate national emissions. Version 5 was published in September 2016 and takes into account real-world driving conditions emissions testing conducted in the UK and other European countries.

would be grateful if you could provide details of the planned procurement timeline.

The preferential procurement approach, which will need both procurement and legal support, is direct award to a specialist consultant. The works to achieve the preferred outcome are currently on-going.

Regional Collaboration

The Committee welcomes the comments of the Cabinet Member for Strategic Planning & Transport in relation to working with neighbouring local authorities to identify the best solutions for dealing with Cardiff's air quality challenges, and in achieving the widest possible audience for the consultation exercise supporting 'Cardiff's Transport & Clean Air Green Paper'. Members firmly believe that improving air quality and transport solutions is a regional issue that can only truly be achieved through real regional collaboration.

Currently 38% of Cardiff's workforce travels to Cardiff from outside the city and, of these, most workers (between 76% and 84%), who make the daily trip into Cardiff from neighbouring local authority areas, travel by car (Census 2011). This highlights the importance of regional collaboration, and Cardiff continues to work closely with neighbouring authorities and Welsh Government to identify and deliver strategic projects, which will support modal shift for journeys starting from outside Cardiff, as well as those originating within the city. For example, the delivery of Strategic Bus Corridors and the planned Park and Ride at Junction 33, represent potentially important cross-boundary intervention.

Councillor Wild has asked that the Green Paper and Welsh Government legal directive be put on the CCRTA agenda.

Low Emission / Sustainable Fuels

The Committee welcomes the commitment made by the Cabinet Member for Clean Streets, Recycling & Environment in terms of developing the use of low emission / sustainable fuels in Cardiff. It is clear that the use of low emission vehicles and sustainable fuel sources will be a major contributing factor in improving Cardiff's air quality. Evidence gathered during the 'Improving Cardiff's Air Quality' task & finish exercise suggests that it is inevitable that this is the future direction of travel for the automotive industry. The Committee encourages you to be bold in your approach and consider all of the potential solutions available, for example, electric and hydrogen powered vehicles. The general view of Members is that there is no single option that will achieve compliance on its own, and that a sensible blend of technologies is the best way forward at this point in time.

Noted: a number of projects and work programmes reviewing low emission/sustainable fuels are underway.

Electricity Supply

Several of the Members were a little concerned at the comment made by the Cabinet Member for Clean Streets, Recycling & Environment about the available supply of electricity in Cardiff being potentially insufficient to meet the future demand created by the growth of electric vehicles. If available, I would be grateful if you could provide details of the current electricity supply available to Cardiff; estimates for the increase in electric vehicles in the city and the projected increase in demand for electricity created by the new electric vehicles.

A feasibility study has been undertaken to identify the process through which Cardiff Council could define a suitable recharging network, based on the specific requirements and objectives for Cardiff. Network capacity will be a primary consideration for the location of any charging infrastructure. A robust understanding of the capacity of the network needs to be developed in conjunction with Western Power Division (WPD), who will be a key partner in the future development of the charging network in Cardiff.

Whilst the market share of Ultra Low Emission Vehicles (ULEVs) is growing, and is expected to increase significantly in coming years, it is difficult to provide accurate estimates for the likely increase in electric vehicles in the city. A number of externalities are likely to have an impact on the uptake of LEVs, including the cost of vehicles, developments in technology (e.g. the range of vehicles and charging requirements), incentives such as scrappage schemes, and the availability of charging infrastructure.

An analysis of available data in the feasibility study found low levels of LEV ownership, with ULEVs currently representing 0.15% of all Welsh licensed vehicles, as compared with 0.34% of all UK licensed vehicles.

Similarly, electric vehicle and charging technology is undergoing a significant period of change, and it is predicted that this rapid development will continue. As a result, there is still uncertainty as to both the number and type of electric vehicles which will be available, and what their charging requirements will be.

Planning Process & Low Emission Vehicle Refuelling Infrastructure

Several Members were concerned that the new developments identified in the Local Development Plan would be created without providing the low emission vehicle charging infrastructure required to meet Cardiff's air quality challenges. I would be grateful if you could confirm the level of debate taking place between the developers and Council to ensure that low emission charging infrastructure is being built into the major new developments and the actions that have been agreed.

In relation to the new developments identified in the Local Development Plan and low emission vehicle charging infrastructure, I can confirm that the Council is undertaking the following actions to encourage developers to provide such infrastructure in new developments:

Supplementary Planning Guidance relating to Managing Transportation Impacts is due to be approved by the Council later this month. The draft SPG highlights the projected increase in the availability of, and demand for, electric vehicles. This guidance seeks to ensure that charging points are installed in line with the current technical requirements at the time of the application. Where there is an opportunity for developments to include vehicle charging points, the Council will encourage their provision and seek to secure an appropriate level of provision through the planning process.

In addition, as part of the action plan for the "Low Emission Transport Strategy for Cleaner, Greener Transportation Fuels" the Council is currently preparing a guidance note for developers setting out the Council's requirements relating to the provision of electric vehicle charging points in new developments. This will aid discussions between developers and the Council, and help ensure that they consider the need to provide such infrastructure when planning new developments.

Finances

The Committee welcomes the positive financial statement made in the letter from the Minister for Environment. It is reassuring to know that the Welsh Government is supporting the Council to address this challenge and that they have agreed to support the funding for the feasibility study and implementation of the scheme to be identified for improving Cardiff's air quality. Members are supportive of the Chief Executives comments in that it is important that we now enter into a productive dialogue with Welsh Government to help achieve the best outcome for Cardiff.

Noted. Officers are in frequent contact with Welsh Government and are meeting with officials on a regular basis to ensure there is an on-going dialogue on this evolving issue.

Air Quality Compliance & Competing Demands

The Committee is supportive of the approach being taken by the Council to ensure that air quality targets are met 'in the shortest time possible' in order to shape the urban environment in a way that delivers improved health benefits and supports economic growth. Members felt that delivering these outcomes was vitally important in terms of achieving the best long-term outcome for Cardiff.

Noted. Engaging with key stakeholders (for example, Public Health officers and the business community) through the Public Service Board and other forums will be central in the development of any future options for meeting air quality targets.

Cardiff's Transport & Clean Air Green Paper

Members welcome 'Cardiff's Transport & Clean Air Green Paper' and the consultation exercise that supports this piece of work. The document is well constructed and identifies a number of important ideas that are essential in transforming Cardiff into a modern sustainable travel city. Unfortunately, the timescales for achieving air quality compliance are very short and some of the more significant projects (for example, the Metro) will be delivered outside of this period. This means that we have to focus on delivering as many of the short term measures within our immediate control as quickly as possible, for example, continued focus on 20 mph zones and parking restriction measures. At the same time we need to ensure that any major transport infrastructure projects due for completion within this timescale are delivered on time.

The rollout of 20mph limits is continuing, with work completed on the Riverside/Pontcanna and Gabalfa 20mph schemes. The rollout of 20mph limits will continue in 2018/19 with schemes in development for Plasnewydd and Adamsdown.

Work will continue to ensure that the Council's major transport infrastructure projects are delivered to timescale and in line with funding allocations. Where projects are being delivered by partners, for example Welsh Government's work on the Metro, the Council will continue to provide support as appropriate.

Clean Air Zones – A Temporary Measure

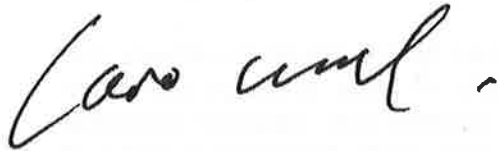
A Member suggested during the way forward that if Cardiff is mandated to implement a Clean Air Zone then it should explore the option of making it a temporary measure that is only applied until air quality compliance is achieved, i.e. it is possible to reverse the position once the objective is achieved. I would be grateful if this suggestion could be

considered and modelled when undertaking the feasibility study and identifying the final plan.

The feasibility study work will seek to model the different CAZ options. As you know the issue is also being consulted on in the Green Paper and we want to ensure a full discussion takes place that also factors in wider considerations such as congestion and public health.

We trust the above is of assistance. If you have any further queries, please do not hesitate to contact ourselves or officers direct.

Yn gywir
Yours sincerely,



Cynghorydd / Councillor Caro Wild
Aelod Cabinet dros Gynllunio Strategol a Thrafnidiaeth
Cabinet Member for Strategic Planning & Transport



Councillor / Y Cynghorydd Michael Michael
Cabinet Member for Clean Streets, Recycling & Environment
Aelod Cabinet dros Strydoedd Glân, Ailgylchu a'r Amgylchedd



Councillor / Y Cynghorydd Susan Elsmore
Cabinet Member for Social Care, Health & Well-being
Aelod Cabinet dros Ofal Cymdeithasol, Iechyd a Lles

Table 1: Local authorities with roads with concentrations of NO₂ forecast above legal limits and assuming no additional measures. All figures are provided in µg/m³ and 40 µg/m³ is the statutory annual mean limit value for NO₂.

Note – includes only roads managed directly by local authorities and Transport for London¹¹⁰

	Name	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
2015 Plan assumed a Clean Air Zone is required	Greater London Authority	97	84	76	66	61	56	53	49	47	45	42	40	38	37
	Birmingham City Council	58	56	53	51	48	45	43	41	39	37	35	34	33	32
	Derby City Council	57	55	52	49	46	44	41	39	37	35	34	32	31	30
	Leeds City Council	58	55	52	49	46	44	41	39	37	36	34	33	31	30
	Nottingham City Council	57	54	52	49	46	43	41	39	37	35	33	32	31	30
	Southampton City Council	58	55	52	49	46	44	41	40	38	37	36	35	34	33
Single stretch of road in excess, modelled as part of the Southampton CAZ	New Forest District Council	53	50	48	45	42	40	38	36	34	32	31	29	28	27
	Middlesbrough Borough Council	62	59	56	52	49	45	43	40	38	36	35	33	32	31
Required to produce local action plans by March 2018 on the basis of modelling which indicates a number of roads need a solution.	Sheffield City Council	53	51	49	46	44	41	39	37	36	34	33	31	30	29
	Rotherham Metropolitan Borough Council	53	51	48	46	43	40	38	36	34	33	31	30	29	28
	Gateshead Metropolitan Borough Council	53	51	48	46	43	40	38	36	34	32	30	29	28	27
	Newcastle City Council	53	51	48	46	43	40	38	36	34	32	31	29	28	27
	North Tyneside Council	50	48	46	44	41	38	36	34	32	31	29	28	27	26
	Bristol City Council	52	49	47	45	42	40	38	36	34	33	31	30	29	28
	Coventry City Council	51	49	47	45	42	40	38	36	34	33	31	30	29	28
	Manchester City Council	51	49	47	44	42	39	37	35	33	32	30	29	28	27
	Stockport Metropolitan Borough Council	49	47	45	43	41	38	36	34	33	31	29	28	27	26
	Tameside Metropolitan Borough Council	53	50	48	45	42	40	38	36	34	32	31	30	29	28
	Salford Metropolitan Borough Council	48	46	44	41	39	36	34	33	31	30	28	27	26	25
	Trafford Metropolitan Borough Council	46	45	43	41	38	36	34	33	31	29	28	27	25	25
	Bolton Metropolitan Borough Council	50	48	46	43	41	38	36	34	33	31	30	29	28	27
	Bury Metropolitan Borough Council	50	48	47	44	41	39	37	35	33	32	30	29	28	27
	Basildon District Council	53	51	48	46	43	40	38	36	34	33	31	30	28	27
	Rushmoor Borough Council	53	50	48	46	43	41	38	37	35	33	31	30	29	28
	Guildford Borough Council	52	50	47	45	42	40	38	36	34	32	31	29	28	27
Required to produce local action plans by March 2018 on the basis of a single stretch of road needing a solution.	Surrey Heath District Council	50	48	46	43	41	38	37	35	33	32	30	29	28	27
	Rochford District Council	52	49	47	45	42	40	38	36	34	32	31	29	28	27

¹¹⁰ This table excludes roads directly managed by Highways England, Transport Scotland, Welsh Government, Transport Northern Ireland, Trunk Road Authority, Mersey Travel, Dartford Crossing, and Tyne Tunnel

Devolved Administrations have policy responsibility	North East Lincolnshire Council	41	40	38	36	35	33	32	30	29	28	27	27	26	25
	Sunderland City Council	43	41	40	37	35	33	31	30	28	27	25	24	23	23
	Warrington Borough Council	42	40	39	37	35	33	32	30	29	28	27	26	25	24
	Broxton Borough Council	41	39	38	36	34	32	31	29	28	27	26	25	24	23
	Luton Borough Council	42	40	38	36	34	32	30	29	27	26	25	24	23	23
	Oxford City Council	44	42	39	36	34	32	30	29	28	26	25	24	23	22
	South Ribble Borough Council	42	40	38	36	34	32	31	29	27	26	25	24	23	22
	Knowsley Metropolitan Borough Council	41	39	37	35	33	31	30	28	27	25	24	23	22	22
	Northampton Borough Council	41	39	38	36	33	32	30	29	27	26	25	25	24	23
	Rochdale Metropolitan Borough Council	41	39	37	35	33	31	30	28	27	25	24	23	22	21
	Darford Borough Council	41	38	37	34	32	30	28	27	26	24	23	22	22	21
	Aberdeen City Council	46	44	42	40	38	36	34	33	32	31	30	29	29	28
	Edinburgh City Council	46	44	42	40	37	35	33	31	30	28	27	26	24	24
	Glasgow City Council	58	55	52	50	46	43	41	39	37	35	33	32	31	30
	South Lanarkshire Council	42	40	39	37	34	32	30	29	27	25	24	23	22	21
	Caerphilly County Borough Council	65	62	59	56	53	50	47	44	42	40	38	36	35	33
	Cardiff County Council	56	54	51	49	45	43	40	38	36	34	32	31	29	28

